
**HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION**

Landmark/District:	Sixteenth Street Historic District/ Christian Science Monitor Building	<input checked="" type="checkbox"/> Agenda
Address:	900 16th Street, NW	<input type="checkbox"/> Consent Calendar
Meeting Date:	May 24, 2012	<input checked="" type="checkbox"/> Demolition
H.P.A. Number:	12-035	<input checked="" type="checkbox"/> New Construction
Staff Reviewers:	David Maloney, Steve Callcott	<input checked="" type="checkbox"/> Conceptual Design

The Third Church of Christ, Scientist (Third Church) and ICG 16th Street Associates, LLC (ICG) seek review of the design concept for a new structure to replace the existing Third Church and Christian Science Monitor Building. These buildings are listed together as a historic landmark in the DC Inventory of Historic Sites, and the property lies within the Sixteenth Street Historic District, although the buildings are considered non-contributing to the district.

In May 2009, the Mayor's Agent approved the demolition of the Third Church building on the basis of economic hardship. That decision authorizes demolition of the church once a permit is issued to construct a new church on the site.

A demolition permit has not yet been sought for the companion building to the present church, the Christian Science Monitor Building, but this application contemplates demolition of the Monitor Building as well. The applicant proposes to seek the demolition permit on the grounds that it is necessary to construct a project of special merit, and that it is consistent with the purposes of the preservation law on the basis of loss of integrity.

Proposed Development

The applicant's project is explained in the attached project description and in the concept design submission dated May 3, 2012. It consists of a nine-story office building incorporating a new house of worship for Third Church. The building is massed as a rectilinear block with dropped corners and a recessed section at mid-block forming the backdrop for the faceted glass church façade. Office facades are composed of glass windows and spandrels framed in limestone. The project would also include new landscaping in the wide public green space along 16th Street.

As is evident from the concept submission, the applicants originally proposed an 11-story building, but that proposal has been scaled back in response to comments received from HPO. Upon receipt of the initial submission, the staff advised the applicants that the building height was the most obvious concern from the standpoint of compatibility with the historic district, and that it would be their burden to demonstrate the appropriateness of any construction above the established limit.

The building now proposed still exceeds the allowable height and density for the Special Purpose (SP-2) district along 16th Street. The SP-2 zone limits buildings to a height of 90 feet, with the

standard allowances for mechanical penthouses above the height limit set back from the building edges. SP-2 zoning permits matter-of-right medium/high density development including residential uses and limited offices for non-profit organization, trade associations, and professionals if approved as a special exception. The allowable FAR is 6.0 for residential and 3.5 for other permitted uses.

The proposed structure would exceed the 90-foot height limit in several respects. The street facades would extend above the limit to 93.7 feet, calculated from the allowable measuring point on I Street. An extra ninth floor would rise to 107.7 feet, with a 30-foot setback from 16th Street and a 15-foot setback from I Street. The top of the mechanical penthouse would be at 123.7 feet. The proposed building size would be 141,220 square feet; on a lot area of 17,483 square feet, this represents a floor area ratio (FAR) of 8.08.

To achieve this additional height and density, the applicant seeks a rezoning of the property from its SP-2 classification to high-density commercial (C-3-C), and approval of a planned-unit development (PUD). C-3-C zoning permits matter-of-right development for major business and employment centers of medium/high density development, including office, retail, housing, and mixed uses. The allowable FAR is 6.5 for the permitted uses, but may be increased with a PUD.

Building Height Restrictions on 16th Street

Sixteenth Street is significant in L'Enfant's plan of Washington as the avenue leading directly to the front of the White House. The Sixteenth Street Historic District, extending from to the original city boundary at Florida Avenue to Lafayette Park, consists of historic residential, institutional, and religious buildings from the city's earliest years to the end of the 1950s. The district was extended in 2007 to include the portion south of Scott Circle, and that section is more densely developed with historic hotels and institutional buildings maintaining a continuous cornice line at 90 feet. The significance of this even cornice line as a character-defining feature was discussed at the Board's designation hearing, as were the monumental character and harmony of materials along the southern section of the street as it approaches the White House.

Height limits along Sixteenth Street have not exceeded 90 feet since the inception of the city's height regulations in 1894. Initially, the street was classified as a residential street and thus—like all other residential areas—was limited to 90 feet (or less) under the Commissioner's height regulations and the Congressional Height of Buildings Acts of 1899, 1903, and 1910. The limit remained at 90 feet after Congress authorized further height controls in the city's zoning regulations, first adopted in 1920 and amended thereafter. With the comprehensive revision of the zoning regulations in 1958, the street was reclassified to the new special purpose (SP) zone, but the 90-foot height limit remained even as height allowances were lifted in adjacent areas.



16th Street looking south from Scott Circle



16th Street opposite project site

With the continued expansion of the city, height limits have been raised in larger areas of downtown to accommodate new growth. This trend is likely to continue with the current revision of the zoning regulations, which will accommodate the new and greatly expanded planning boundaries for the downtown area, and promote the benefits of concentrating density downtown. As other areas of the commercial core increase to a more uniform height, however, the importance of retaining the special quality of the most sensitive L’Enfant boulevards and vistas becomes even greater, as does the value of establishing and adhering to clear height limits that are not eroded away and negotiated piecemeal from project to project.

The city’s height restrictions have been debated periodically for years, and there has been recent discussion of the issue in the media. Yet even advocates of more flexibility in the restrictions have cited the importance of not raising height limits in a way that would adversely affect significant vistas or historic areas. In this context, it is hard to identify a street in downtown Washington that would be more important to protect than 16th Street, the symbolic approach to the residence of the President.



16th Street looking north (Sarah Voisin, Washington Post, 12/9/2011)

Comprehensive Plan Guidance

To help establish a policy context for consideration of height issues, the District's Comprehensive Plan provides ample guidance from broad principles to analysis of defining urban characteristics to specific policies and recommended actions.

In its introductory sections, the plan sets forth 36 Guiding Principles for the city's planning and development. Among these underlying principles for the future are the following:

Washington's wide avenues are a lasting legacy of the 1791 L'Enfant Plan and are still one of the city's most distinctive features. The "great streets" of the city should be reinforced as an element of Washington's design through transportation, streetscape, and economic development programs. (§220.3)

The District's communities are connected by a shared heritage of urban design, reflecting the legacy of the L'Enfant Plan, the McMillan Plan, the Height Act of 1910, and preservation of much of the historic urban fabric. After more than two centuries of building, the nation's capital is still a remarkable place. Urban design and streetscape policies must retain the historic, majestic, and beautiful qualities that make Washington unique among American cities. (§220.7)

The site selected for the national capital was characterized by a very special topography, including hills interlaced with broad rivers and streams. The topography allowed for the construction of a special collection of buildings that give the District a unique profile. This profile has been further protected by local and national ordinances and must continue to be protected in the future. This should include the protection of views and vistas and the enhancement of city gateways. (§221.1)

The plan's priorities and policies elaborate upon the importance of these guiding principles, with provisions such as the following:

Central Washington's design is unique among American cities. Its distinguishing qualities, including its diagonal avenues, monumental buildings, low building heights, and open spaces, are viewed as some of the District of Columbia's greatest assets. It is essential that new buildings reflect this character and add to the sense of place. . . . (Planning and Development Priorities for Central Washington, §1607.2(e))

Reinforce the physical qualities that set Central Washington apart from all other major American city centers, including the L'Enfant framework of diagonal avenues and park reservations, relatively low building heights, the great open spaces of the National Mall and Tidal Basin, the large number of historic and/or monumental buildings, and the blending of historic and contemporary architecture. (Policy CW-1.1.12: Reinforcing Central Washington's Characteristic Design Features, §1608.13)

Between 2005 and 2025, approximately 30 percent of the District of Columbia's future housing growth and 70 percent of its job growth will occur within the urban core of the

city and adjacent close-in areas along the Anacostia River. This growth must be accommodated in a way that protects the area's historic texture, including the street and open space frameworks established by the L'Enfant and McMillan Plans, the 1910 height limit, and the vistas and monumental spaces that define the central city. . . . (Strengthening the Core, §304.2)

Preserve the scale and character of the Central Employment Area's historic resources, including the streets, vistas, and public spaces of the L'Enfant and McMillan Plans as well as individual historic structures and sites. Future development must be sensitive to the area's historic character and should enhance important reminders of the city's past. (Policy LU-1.1.6: Central Employment Area Historic Resources, §304.12)

In the plan's Urban Design element, 16th Street is identified as among the city's 15 or 20 major "boulevards" (diagram, §906.7). The policies that apply to these boulevards include:

Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place. (Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors, 906.9)

Sixteenth Street is also addressed specifically in the plan's description of the Golden Triangle/K Street Policy Focus Area of Central Washington, as follows:

On the eastern side of this Focus Area, Lower 16th Street has a unique and historic character that sets it apart from the area around it. The five blocks between H Street NW and Scott Circle are the ceremonial gateway to the White House and provide significant vistas of the White House and Washington Memorial. The street's green space and exceptionally wide right-of-way (40 feet between the sidewalks and property lines) are a defining element of its character. In addition, the corridor includes notable architecture and a mix of uses, including high-density housing. It is currently under consideration for historic district designation. (Golden Triangle/K Street Policy Focus Area description, §1616.3)

The plan includes the following policy for Lower 16th Street:

Protect and enhance the special character of Lower 16th Street NW between H Street and Scott Circle. The street's historic, ceremonial role as the approach to the White House and Lafayette Park should be recognized and conserved. Future development *shall be* [emphasis added] compatible with the street's established architectural character and scale. Uses and activities that are appropriate to maintain the street's appearance and historic significance, particularly its open space and greenery, should be encouraged. (Policy CW-2.2.6: Lower 16th Street, §1616.12)

Evaluation of Proposed Height

The applicant argues that the additional construction above the allowable height would be compatible with the character of the Sixteenth Street Historic District because it would be set back from the street and visible only from certain vantage points, so that the building would still “read” as a 90-foot structure. The applicant also argues that the 93.7-foot cornice height would help shield the visibility of the additional floor from the street.

While it is certainly true that the proposed extra floor is not as anomalous as the three floors originally proposed, it would nonetheless be visible from the street in a way that would make it apparent the building did not follow the same urban design rules applied to its neighbors. In View 12 of the submission, for example, the top floor and elevated penthouse are easy to see, and would be even more visible further east along K Street. In the 16th Street elevation drawing and in View 23, the jump in cornice height above its immediate historic neighbor to the north, the World Center Building, is obvious. While some of the nearly 8-foot misalignment is due to the slope in street grade, the effect is of a discordant or unplanned design relationship, as opposed to the harmonious relationship of height and mass that the existing Monitor Building achieves. And it hardly needs to be said that the advantage of shielding the recessed upper floor by projecting above the established cornice height would disappear if the extra floor did not exist.

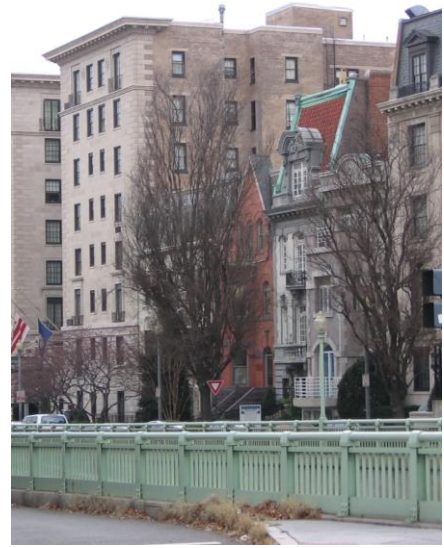
Given the long-standing consensus about Washington’s invaluable urban design legacy, there seems little justification for discarding a height limit that has applied consistently to 16th Street for nearly 130 years and which has fundamentally shaped its character, merely to allow an extra 10,000 square feet of office space in a proposed structure that already significantly exceeds the matter-of-right zoning density. Such an action would inevitably chip away at a simple rule that protects the urban design character of the frontal approach to the White House in a manner fully supported by the city’s well-established urban design and planning policies.

Potential Impact of Precedent

HPRB endorsement of the extra height requested in this proposal would establish a precedent for future proposals on 16th Street. HPO has already been contacted by the St. Regis Hotel, diagonally opposite Third Church, about the possibility of adding an extra floor for a rooftop restaurant, and representatives of other property owners along the street have indicated that their clients are considering building above the established height. The National Geographic Society has recently announced plans to modernize its headquarters, and both labor unions at 16th and I Streets are beginning to consider construction plans that may include proposed additional floors.

The potential impact of these changes can be extrapolated by a careful look at existing conditions along the street. Several conclusions can be drawn from such an analysis:

1. *Because of the width of 16th Street, construction above the 90-foot cornice height is typically visible. As shown in the photographs below, this includes setback floors and mechanical penthouses, as well as exposed equipment (left photo), stair towers (right photo), and roof decks (middle photo):*



2. *When construction is visible above the 90 foot height limit, its prominence depends largely on its size relative to the main building, its appearance, and lines of sight from various vantage points. In the following examples, penthouses above the cornice line are clearly secondary and incidental elements, and do not change the perception of the building as stopping at the cornice:*



Even larger penthouses do not tend to change the apparent height of the building because they are not perceived as additional floors. The lack of windows, flat appearance, and lack of architectural detail do not call attention to these penthouses even though they are easily seen:



Conversely, the addition of windows makes setback construction seem more a part of the main building, even at a similar ratio of setback. Thus, the apparent height of the building increases:



Only where there is a very large building, as at the 1500 Massachusetts Avenue apartments (below left), or a very deep setback, as at the Capital Hilton (below right), is the proportional relationship between the 90-foot main building and the taller penthouse such that the 90-foot expression is dominant, and the architecturally expressed centerpiece remains a secondary element. This condition is only possible on very wide or deep sites, with sufficient space to set the roof element significantly back from the front and/or sides of the building:



The comparison with the newer apartment building across Massachusetts Avenue shows how continuous upper floors change the scale of the building. In the case of the Capital Hilton, the upper floors are fully visible when seen head-on, rising above the main entrance:



But the 106-foot setback—the full width of the original 16th Street lot—ensures that the taller portion of the building does not disrupt the harmonious procession of buildings along the street, where only the hotel's forward wings are seen (at left in both photos):



In contrast, on the opposite side of the street, the main 130-foot block of the Solar Building is set back only 35 feet from 16th Street, and thus is easily seen as extra floors rising above the 90-foot cornice (below). While the building maintains the even cornice line relating to the street, the pattern of windows, breadth, and architectural treatment of the extra floors make it clear that they are not incidental, but part of the main building. Thus it is obvious that it is built at a different scale than its neighbor to the north (at right in photo) and other buildings along 16th Street.



3. *The construction of extra floors on non-contributing buildings along 16th Street, or in new construction to replace these buildings, would diminish the sense of openness along the street and increase the scale of the buildings. If setbacks of 30 feet from 16th Street façades and 15 feet from side facades were established as rules of thumb, extra floors would typically be visible from some vantage points and the large mechanical penthouses would be raised higher in the air above the established cornice line. For the buildings shown below, now more than 40 years old, such additions would be likely when the sites were proposed for redevelopment. Similar possibilities could exist for more recently constructed non-contributing buildings like the National Education Association or American Chemical Society.*



4. *The addition of extra floors on historic buildings along 16th Street would be incompatible with the architectural character of the buildings and would diminish the sense of openness along the street. For example, on buildings with forward wings, the rhythmic quality of the simple blocks is an essential architectural feature, and the clear outline of these wings against the sky is important. Even partially visible extra floors would diminish the effect:*



From some vantage points, especially where adjacent historic buildings are at a lower height, extra floors would be particularly prominent and obtrusive, as shown below:



This would also be a consideration for any new construction at the National Geographic Society headquarters, where the historic buildings on 16th Street are at a lower scale. These buildings feature hipped roofs on the front pavilions, which are about 35 or 40 feet deep:



For some historic buildings along the street, the potential for additional floors after a 30-foot setback might encourage proposals to replace rear wings with new construction higher than the main block of the building. Properties where this might occur include the historic apartment buildings that have been converted to office use, and where larger floor plates could be achieved by filling in the rear light courts. The former Milburn apartments (1921) at 1010 16th Street (left photo below, at left) and the former Pall Mall apartments (1940) at 1112 16th Street (right photo below, at left) are in this category.



The historic buildings that are immediate neighbors to the project include at 16th and K Streets the former Carlton (now St. Regis) Hotel (1930), and the World Center Building (1950); and at 16th and I, the Laborers' International Union Building (1959) and AFL-CIO Building (1955). Each of these buildings is block-like in its apparent massing.

The hotel and World Center buildings have small visible penthouses that are simplified abstractions of their façades. An extra setback floor on these buildings (proposals have been made for both) would be visible in some views, detract from the façades, and necessitate the construction of larger new penthouses at a higher level. On the hotel, the design relationship between the penthouse and facades would be lost. Both the buildings and streetscape would be affected by a broad band of new windowed attics above the current facades.



The AFL-CIO penthouse has an architecturally designed penthouse with an unusual triple-vaulted southern façade forming a backdrop to St. John’s Church as seen from Lafayette Square. The solidity of the planar limestone facades of the penthouse sets off the large windows and open arcaded top floor of the building (photo below). The penthouse of the Laborers’ Union building is also unusual, with a two-tiered design that reflects an angle-of-sight rule that was discarded with the 1958 zoning regulations. As with the AFL-CIO penthouse, the solidity of the planar limestone facades of the lower penthouse sets off the large window panels of the building below, while the pier-and-spandrel design of the upper penthouse echoes the colonnade effect of the facades below. When seen along the street, the penthouses of these two labor union buildings relate harmoniously:





Comparisons with the Current Proposal

The four examples of 1500 Massachusetts Avenue, the Capital Hilton, AFL-CIO, and Laborers' Union are instructive. In each case, the building penthouses are designed as part of an overall sculptural composition that is appropriate for the 90-foot height limit. These penthouses add visual interest without affecting the character of the street by adding additional floors that make the buildings look out of scale.

In the case of the present proposal for the Third Church site, the new penthouse is raised a level above its normal height in order to accommodate an additional rentable floor, rather than for any urban design purpose. In acknowledgement of the desirability of hiding the penthouse, it has been pushed to the extreme corner of the site, where it hugs the tower of the neighboring ULICO building with no design relationship to it. Although the buildings will abut in any case, the tower will continue to be a prominent urban design feature, developed in consultation with HPRB, and basic rules of compatible design should still be followed. Not concealing the upper portion of the tower any more than necessary makes good urban design sense.

It should be noted that in the applicant's submission, the extra office floor and penthouse are lightly shaded in relation to the ULICO tower, whereas in fact both the extra floor and penthouse project forward of the tower, leaving it to rise at the end of a deep well (see penthouse plan).

Despite the inappropriateness of the illuminated box at the top of the tower, which looms behind the White House at night as seen from the Mall, it is otherwise designed as an effective campanile to the octagon of the Third Church. While developed 40 years apart, the Third Church and the ULICO tower (opposite left) are both architectural references to the Duomo in Florence and its composition of octagonal baptistery and adjacent bell tower (opposite right).

This is not to suggest that the applicants need to recreate this relationship, which will obviously change with the construction of a new building on the Third Church site. However, any new project on this site should establish appropriate new urban design relationships that acknowledge, relate to, and enhance the particulars of its context.



Other Architectural Concerns

In addition to the height issue, HPO has also advised the applicants of the need to ensure visual compatibility with the character of the classically-inspired limestone facades that dominate this section of 16th Street. The use of limestone for the new building is certainly appropriate for its context, but the high proportion of glass to stone and the pier-and-spandrel aesthetic are less convincing because they make the facades seem decidedly more commercial in character, and thus more akin to a vocabulary appropriate on commercial streets. Further development of the composition would help bring the building into a more harmonious relationship with its specific historic context.

The crystalline glass frontispiece proposed for the church is an effective and appropriate way to distinguish it as a distinct element in the streetscape, at a scale similar to St. John’s Church. The landscape design also appears appropriate in concept.

Preservation Issues Related to Special Merit

The Board has typically provided its evaluation and advice to the Mayor’s Agent on aspects of a “special merit” claim that relate to historic preservation and design. In this case, the applicant’s stated claim includes exemplary architecture and landscaping, as well as financial support of local preservation efforts, among other benefits.

Exemplary architecture and landscaping. The Mayor’s Agent has reserved a finding of “exemplary” architecture for very few projects, especially under the standards followed in recent decades. Projects approved on this basis include the expansions of the Phillips Collection (2000), Corcoran Gallery of Art by Frank Gehry (2002), and Arena Stage by Bing Thom (2002). It is not surprising that all three of these projects were arts-related buildings of a civic nature. As the Comprehensive Plan acknowledges, the most innovative and distinctive buildings tend to be public places—museums, libraries, and other structures where maximizing rentable space is not the primary objective.

While consistent with current high design standards for speculative office buildings in prime downtown locations, the proposed structure does not appear to exhibit the exceptional qualities that would justify an exemplary determination, even disregarding height issues.

The only Mayor's Agent's approval on the basis of exemplary landscape planning has been for the Tregaron Estate (2004). This decision cited minimizing the impact of new houses in a rare historic garden landscape, ensuring that the new houses would be invisible from the most important vistas and vantage points within the estate, and respecting important topographical, man-made, and natural features and characteristics.

While the landscape treatment proposed for this building is consistent with the historic character of 16th Street, it does not appear to be exceptional or markedly superior to that provided by comparable projects. It is also not in the same league as the Tregaron project, which involved a highly unusual three-party agreement and donation of a substantial part of the historic garden to a land conservancy for restoration and public access.

Financial support of local preservation efforts. The proposed financial support for preservation is outlined in the settlement agreement between the applicants and DC Preservation League (copy attached). The agreement contemplates a minimum contribution of \$450,000 into a fund established by DCPL to support Mid-Century Modern and religious architectural programming, research, and/or grants.

While it is within the purview of the Mayor's Agent to judge the merits of such *quid pro quo* agreements, the proposed amount of financial support is substantial. It is comparable to the fund established under a settlement agreement between DCPL and Monument Realty regarding development at the Capitol Park Apartments, and is roughly equivalent to the annual grant the DC historic preservation program receives from the federal Historic Preservation Fund.

Recommendations

The staff recommends that the Board find the proposed construction in excess of the 90-foot height limit to be incompatible with the character of the Sixteenth Street Historic District and the urban design character of a major contributing element of the L'Enfant Plan.

The staff further recommends that the Board encourage the applicant to revise the project within existing height restrictions and to strengthen its design compatibility with the historic context.