

West Heating Plant
Resolution by ANC 2E at its public meeting on
February 1, 2016
Regarding the Application for a Demolition Permit –
OG 16-108 (HPA 16-180)

Overview

The review of a demolition-permit application for a building qualifying for historic preservation protection is never a simple matter.

This is particularly true in the case of the West Heating Plant, which is a contributing building in a National Historic Landmark District; is eligible in its own right to be listed in the National Register of Historic Places; is subject to a special deed covenant that would apply federal rather than local criteria for examining demolition issues; and is subject to technical issues regarding the feasibility of rehabilitation on which experts may disagree.

Rather than suggesting conclusions about these matters, we identify and outline the various issues and suggest a pathway for analysis by the reviewing authorities. In a separate resolution, we also identify various design-review issues regarding the two possible replacement buildings proposed by the applicant.

Demolition

The federal standard –

The federal standard regarding demolition applies because of a covenant placed in the deed by the previous owner, the U.S. General Services Administration.

The federal standard provides that if it is feasible to rehabilitate the building for occupied use, the building should be rehabilitated

The West Heating Plant (WHP) presents a consistent design from a distinctive period in American architectural history and is part of the industrial history of the Georgetown waterfront. The WHP has

been determined by the applicable federal authorities to be eligible for listing on the National Register, and this can be taken into account as well as its status as a contributing building in the Georgetown National Historic Landmark District.

Under the federal standard, the quality of a replacement building is not relevant. Neither is the developer's offer of amenities.

Applying the federal standard –

The applicant's structural engineer and the independent peer-review structural engineer disagree about the feasibility of rehabilitation, principally disagreeing about the predicted extent of rust jacking and whether signs of this will be visible so that the condition can be addressed in a timely way.

The engineers also disagree about the percentage of original bricks that are likely to be saved if the building is restored.

The CFA staff summary of the engineers' positions is very helpful in understanding the matters considered by the engineers.

If environmental matters are raised as an issue, ANC 2E is on record as supporting an independent review, particularly of the possibilities for mitigation of the environmental issues and preservation of the building.

If other matters are raised involving specialized expertise, an independent review may also be a useful option.

The deed covenant provides that the D.C. State Historic Preservation Officer may waive the covenant

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GSA put the deed covenant in place to justify GSA itself not conducting the federal demolition/preservation review that otherwise would be required of GSA.

It would not have been legal for GSA to waive applying the federal historic preservation rules had GSA itself conducted the

demolition/preservation review. Is it legal, or sound policy, to delegate the review to a SHPO and allow a waiver there of the federal HP rules?

The D.C. standard (if appropriate) –

The D.C. standard also supports preservation when feasible, while allowing exemplary design of a replacement building and benefits to the community to be taken into account in the decision.

Replacement building design –

Is the design of either of the proposed replacement buildings exceptional enough to justify demolition of the current building?

Relevant community benefits. –

Are there qualifying community benefits?

It is unlikely that luxury condominiums would be considered a qualifying community benefit.

The proposed park would be on land already designated under the D.C. Comprehensive Plan as open space, so it seems likely that any developer's plans for the property would be required to include a similar amenity.

Under these circumstances, would the park count as a qualifying community benefit?