



**Testimony to the Committee on the Whole
Oversight of the Office of Planning
Thursday, February 28, 2019**

Rebecca Miller on Behalf of the DC Preservation League

Good morning, Chairman Mendelson. My name is Rebecca Miller and I am Executive Director of the DC Preservation League (DCPL), Washington's citywide nonprofit that for the past 48 years has been dedicated to the preservation and protection of the historic and built environment of our nation's capital. I am pleased to be here today and thank you for the opportunity to provide the DCPL's evaluation on the performance of the Office of Planning (OP) this past year. DCPL works closely with the Historic Preservation Office (HPO) and its parent agency, the Office of Planning, to help carry out our mission and in doing so support DC-led initiatives that successfully utilize historic preservation as a tool for economic growth and vitality.

OFFICE OF PLANNING

We would like to thank Acting Director Andrew Trueblood for reaching out to DCPL to meet and learn about the organization's initiatives. DCPL looks forward to a positive working relationship with him and his staff moving forward.

COMPREHENSIVE PLAN

DCPL was on record at last year's OP oversight hearing stating our profound concerns about the proposed amendments to the DC Comprehensive Plan and the negative consequences it portends for the future of the Nation's Capital. We look forward to additional opportunities for input before the DC Council.

HISTORIC PRESERVATION OFFICE

Given our mission, DCPL is in regular contact with HPO staff on a wide range of topics. The HPO staff is a seasoned group of professionals who are responsive to community concerns within the limits of staffing and budget constraints. However, those constraints are very real, and, DCPL doesn't feel that the HPO receives the financial support it needs through OP's budget.

HPO receives federal funding from the National Park Service that pays for several staff salaries. This funding however, has not increased in more than a decade, staff salaries have grown with the cost of living, thereby reducing the funds available for other activities such as survey and documentation, grant making, and outreach programs like the Awards for Excellence in Historic Preservation. Although the awards did not take place in 2018, DCPL is pleased that HPO is able to support the awards in 2019, albeit at a reduced financial level.

ENFORCEMENT

HPO staff has a tremendous regulatory load that precludes or limits carrying out other aspects important to the Preservation Program. For instance, enforcement...while the Council included an additional inspector in the FY18 budget, the amount of illegal construction taking place in historic districts only increases. At this point, it is – in a word -- breathtaking. Even if the violations are for seemingly small details, they are important. Every time a homeowner doesn't get a permit, and puts in the wrong profile of window, or adds a wooden stair in lieu of cast iron, it diminishes the character of a neighborhood.

Or maybe the property owner did get a permit to do a renovation, but the windows don't fit the openings, the addition is just a bit bigger than permitted, or in the case of the Korean Cultural Center on Logan Circle the repointing work on the façade is so obviously bad that it draw the eye of passers-by that even someone not well versed in building construction notices it – all of these issues diminish the character of historic districts.

Who should ensure that any project actually conforms to the permit issued? Does regular HPO staff have the time to do this, or should it be the role of the HPO enforcement officers or general building inspectors? If it should be the function of regular inspectors, how will they acquire the specialized knowledge that may be required to assess proper restoration or recreation of historic details?

The enforcement “system” still relies fundamentally on complaints from neighbors or other members of the public. But they have no reliable way of knowing what is going on or may have been approved. Nor is there an online tracking system for complaints. While stop work orders are now recorded (or supposed to be recorded) in the DCRA permit tracking database, they certainly represent only a fraction of the complaints received; and there is no way a member of the public can follow their resolution. Most issues are resolved internally within DCRA with no public record being made.

DCPL has testified for years about these issues, and because of the difficulty in achieving meaningful progress, we continue to identify the lack of reliable enforcement as a key threat to the character of our historic neighborhoods and the quality of life in the District.

HISTORIC PRESERVATION REVIEW BOARD

The HPRB is the official body of advisors appointed by the Mayor to guide the government and public on preservation matters in the District. The HPRB helps implement and maintain DC's historic preservation law as one of the strongest and most successful ordinances of its kind in the country. In order for HPRB to adequately serve the District and support the mission of the historic preservation office, members of the board are expected to understand the Secretary of Interior Standards for Evaluation of Historic Properties. Although DCPL is pleased that the board members have been receiving training on these standards and other aspects of their responsibilities on HPRB, , some board members still reflect no working knowledge and indeed little interest in the regulations enacted along with the 40-year-old Historic Landmark and Historic District Protection Act.

INCREASED FUNDING FOR PRESERVATION PROGRAMS

Historic Preservation programs are important to the residents of the District of Columbia. No less so than humanities or the arts. The DC Council declared as a matter of public policy in 1978 that the protection, enhancement and perpetuation of properties of historical, cultural and aesthetic merit are in the interests of the health, prosperity and welfare of the people of the District of

Columbia. Yet, there is very little investment in the program for education, outreach or the Homeowner Grant program that services low-and-moderate income homeowners.

Advocates opposed to historic districts contend that it causes housing unaffordability or doesn't allow for the housing market to grow. This is false. Designation does not drive the market. A host of other factors do. Nor does it preclude development of new housing. Data from the Washington, DC Economic Partnership show that nearly 18% of new units produced in the last 3 years were in historic districts or in historic landmarked buildings. For instance, a warehouse was reused to include retail space and 300 units of rental housing; another project adaptively reused a market hall for a modern grocery store and included 600 housing units within an historic district. 120-units of affordable housing are currently under construction in the Anacostia Historic District.

As for unaffordability, it's just not a simple formula of supply and demand as the Mayor asserts. The City has been so focused on approving every luxury new building or rehab around town since the early 2000's that it has fallen far behind on housing for low and moderate income households, particularly families. Also, there is an apartment vacancy rate of about 4.5%, but these prices aren't going to come down because the tax benefits on the income loss makes more financial sense than lowering the cost of the rent which take years to recoup.

So let's help our low and moderate income homeowners by expanding the Historic Homeowner Grant Program to all historic districts and landmarks in the city. The only restriction should be income. Dedicate funds and an FTE to run the program.

Historic Preservation has proven to be a vital component to the economic development and resurgence of Washington's historic neighborhoods and downtown. Preserving the cultural and built heritage of our city provides and promotes endless educational opportunities for residents and tourism prospects for millions of visitors. The protection and enhancement (i.e. restoration, rehabilitation and adaptive reuse) of Washington's historic resources should be a top priority for the Mayor and the DC Council by ensuring that the Historic Preservation Office is adequately funded and staffed to meet current and future workloads that are imposed upon them as the city grows and evolves. It is far past time for the Council to put its money where its policy is.

We look forward to our continued work with both the OP and the HPO and thank you for your time and attention to these matters.

Presented on behalf of:

Bloomingdale Historic District Coalition	Historic Anacostia Preservation Society
Committee of 100 on the Federal City	Historic Mt. Pleasant
Dupont Circle Conservancy	Kingman Park Civic Association
Historic Anacostia Block Association	Tenleytown Historical Society