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November 15, 2017

Marnique Heath, Chair
Historic Preservation Review Board
441 - 4th Street, NW
Room 220 South
Washington, DC 20001

Re: Harrison Street Substation
5210 Wisconsin Avenue, NW
HPA 18-014

Dear Chair Heath and Members of the Historic Preservation Review Board:

Ward3Vision, a grassroots organization of citizens seeking to promote urban vitality and smart growth in Ward 3, opposes the designation of the PEPCO Harrison Street substation as a historic structure.

This application seeks to protect a degraded, unsightly structure that is neither of distinctive artistic value or associated with an historic event. Preservation here would not only be unjustified on the merits of the property -- a faux facade for a power substation -- but would chill development of residential and retail uses on a major commercial corridor and at a location that is easily accessible to the Friendship Heights metro stop and bus station. The damage to the community from the unjustified designation being sought would be a tragic loss for the DC side of what should be a thriving commercial and residential district.

The rationale proffered by the applicant, that this is an attempt by the utility company to hide the machinery and have the facade blend into the community, does not make the structure historic. If it were, then any structure designed to hide a utility installation would be historic for that reason, regardless of its design or context. When this policy was applied to all substations, it led to the creation of tiny residential-style “homes” housing transformers throughout the city many of which have since been converted into private residences. While these are cute, there is no justification for listing on the Register.

Their argument about hiding the machinery to avoid attack in the event of war also does not elevate the structure to something associated with a “historic event.” This is not the house where Washington slept nor where Lincoln wrote the Gettysburg

address, nor does this false façade successfully “hide” the very evident hulking substation structures behind it.

This building does not demonstrate a distinctive artistic style or merit. It was designed by PEPCO’s in-house architects. The proportions are the result of the size of the street frontage and minimum height to hide the transformers and other equipment behind it rather than to exemplify outstanding art deco design. Most, if not all, the art deco features have been changed, damaged or obscured over the decades, as detailed in the ANC 3E Resolution.

Although a one-story commercial building may have blended into the streetscape along Wisconsin Ave. in 1940, this is no longer the case. Friendship Heights has transformed from a streetcar suburb to active, vibrant mixed use on the Maryland side of the District Line. The real estate value of the block of Wisconsin Avenue just south of the line calls for equally intense forms of development. The question may be reframed as to whether a mediocre building should be preserved as a reminder of a basic principle of urban design – to consider context. However, that same policy would result in a very different building (in scale and design) if it were to be built today. .

We strongly believe that listing this property on the Register of Historic Places would freeze development into a form appropriate more than 75 years ago. This application is so lacking in merit and was timed to conflict with the issuance of a building permit, denigrating the historic preservation process into a transparent attempt to block development rather than truly protect something of historic importance. As such it undermines the intent and credibility of historic preservation.

Ward3Vision urges the Review Board not to grant historic status to PEPCO’s Harrison St. substation.

Respectfully submitted,

/s/

Susan Kimmel
Chair, Steering Committee
Ward3Vision