

Sara Taylor-Ferrell

From: 1 Sara Taylor-Ferrell **ATTACHMENT C**
Sent: Wednesday, April 13, 2016 4:08 PM
To: 'Evelyn Ward'; mayorcouncil
Subject: RE: Project Plan Application PJT2015-00005

Ms. Ward,

On behalf of the Mayor and Council, thank you for your comments on Chesnut Lodge Application PJT2015-0005. Your comments will be placed into the official record and considered by the Mayor and Council as they discuss.

The Mayor and Council will hold Public Hearing on April 25.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

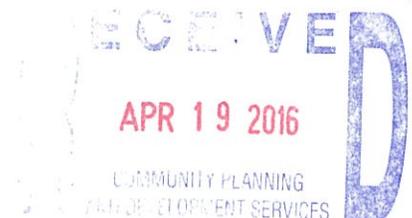
City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

-----Original Message-----

From: Evelyn Ward [mailto:evelyn.ward28@yahoo.com]
Sent: Wednesday, April 13, 2016 3:42 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Project Plan Application PJT2015-00005

I am the owner of the property at 409 West Montgomery Avenue, and I want you to know that I am opposed to the above application. Thank you for your consideration.

Sincerely,
Churchill E. Ward



2 April 12, 2016

ATTACHMENT C

RE: Chestnut Lodge Project Plan Amendment PJT 2015-00005

2016 APR 19 PM 1:41
CITY OF ROCKVILLE

Dear Mayor Newton and City Council Members,

I am writing to express my opinion regarding the proposed Chestnut Lodge Project Plan Amendment. Attending evening hearings and meetings are difficult for me due to the hours I work so I am writing instead. I am against the proposed change from condominium to townhouse dwellings for several reasons.

First, in keeping with the historic nature of the property, the Lodge should be rebuilt as it was to be restored in the original condominium plan. This is a viable and accepted solution utilized the world over for maintaining the relevance of historic sites. Having lived in Japan for two years, it was typical to visit a famous historic site only to find that the building on the site was the sixth, or more, replica of the original. Chestnut lodge was an historic, and nationally recognized, cornerstone of the West End. To simply abandon that part of Rockville's history is very short-sighted.

Second, the neighborhood is clearly marked "Chestnut Lodge" at the entrance on West Montgomery Avenue. At this juncture, the only logical thing to do is rebuild the Lodge, to keep the neighborhood's identity intact.

Third, the very identifier "town house" would imply that this type of multi-unit structure belongs closer to or within a town center, rather than in an outlying neighborhood. In the latter setting, those structures become the more modern designation "townhouse" which does not fit into an historic neighborhood like the West End. While this point may seem like I'm arguing semantics, it is key to maintaining the historic neighborhood characteristic of the West End.

Finally, when my family and I moved to the West End from a townhouse community in Gaithersburg, we were, and still are, proud to be a part of the history of Rockville. As owners of the Duncan House, we recognize we are custodians of a piece of historic Rockville. Introducing townhouses to our neighborhood would undermine and erode the historic heritage that defines the West End, and Rockville itself.

I fervently hope you will decide to overrule the plan amendment to develop townhouses on Chestnut Lodge and instead rebuild the Lodge as originally proposed.

Sincerely,



Sally Robinson
400 West Montgomery Avenue
Rockville



3
Mayor & Council
City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850-2364

Subject: Examples of Accepted Historic Reconstruction efforts across the Nation

The West End Citizen's Association (WECA), Committee for Historic Chestnut Lodge, presents the attached document(s) for your consideration. You will find this information a useful reference as the City deliberates the proposed amendment to PRU2005-00022, its associated project plan, and public comments from the Citizens of Rockville.

Historic Reconstruction of a lost, historically-significant structure is one of the (4) approved techniques used in the Secretary of the Interior's Technical Preservation Services (TPS) and is used far more frequently than most preservationists would expect.

Attached is a brief excerpt from the Secretary of the Interior's TPS Standard For Reconstruction, which helps define what Reconstruction is, and how it is best applied. We believe Reconstruction is viable in Rockville.

The second attached document, a 2011 Virginia Commonwealth University (VCU) Master's Thesis, describes many examples across the United States of successful efforts at Historical Reconstruction. These include efforts made by private organizations, city, county, state, and national levels. Many of these reconstructed properties are recognized nationally as 'historic resources' within historic sites.

The sheer volume of examples described and pictured within the document include site visits, interviews, and the author's analysis to provide valuable evidence that Historic Reconstruction, done under the proper constraints and rules, is a viable option on certain historic sites.

We invite the City Government to review the attached document, and if they agree with the findings of the document, to officially recognize Historic Reconstruction as an acceptable method of Historic Preservation in the City of Rockville.

Sincerely,

Patricia Woodward, Civic Activist and WECA Committee on Historic Chestnut Lodge Chair

Larry Giammo, former Mayor of Rockville

Dr. Kate Ostell, former Planning Commissioner of Rockville

Paul Newman, President of the Thirty Oaks Home Owner's Association

Marion Hull, Civic Activist

Andrew Sellman, Historic Home Custodian

Noreen Bryan, President of the WECA

West End Citizen's Association

West End Citizen's Association – a Case for Reconstruction as a means of Historic Preservation for Rockville

(Excerpt from the Technical Preservation Standards, National Park Service, Secretary of the Interior)

The Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties are common sense historic preservation principles in non-technical language. They promote historic preservation best practices.

There are (4) accepted standards and additional guidelines for treatment that are most relevant to our case.

- Standards for Preservation
- Standards for Rehabilitation
- Standards for Restoration
- *Standards for Reconstruction*
- Guidelines for the Treatment of Historic Properties
- Guidelines for the Treatment of Cultural Landscapes

This brief focuses on introducing *Reconstruction as a viable mean of Historic Preservation* for the City, now and in the future.

Reconstruction is defined as the act or process of depicting, *by means of new construction*, the form, features, and detailing of *a non-surviving site, landscape, building, structure, or object* for the purpose of *replicating its appearance at a specific period of time and in its historic location*.

Standards for Reconstruction

- Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property

- Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

- Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.

- Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties.

- A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture. reconstruction will be clearly identified as a contemporary re-creation.

- Designs that were never executed historically will not be constructed.

When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment.

The companion Guidelines for the Treatment of Historic Properties illustrate the practical application of these treatment standards to historic properties.

The companion Guidelines for the Treatment of Cultural Landscapes apply these treatment standards to historic cultural landscapes.

WECA has also discovered a 2011 Master's Thesis, created by a former National Park Ranger stationed at the Appomattox Court House National Historical Park, *which demonstrates that Reconstruction has been widely used across the United States* and often with the support and recognition by the National Park Service.



Virginia Commonwealth University
VCU Scholars Compass

Theses and Dissertations

Graduate School

2011

The Reconstruction of Historical Buildings: A Visitor and Historical Site Study

Alyssa Holland

Virginia Commonwealth University

Follow this and additional works at: <http://scholarscompass.vcu.edu/etd>

 Part of the [History Commons](#)

© The Author

Downloaded from

This Thesis is brought to you for free and open access by the Graduate School at VCU Scholars Compass. It has been accepted for inclusion in Theses and Dissertations by an authorized administrator of VCU Scholars Compass. For more information, please contact libcompass@vcu.edu.

The Reconstruction of Historical Buildings:
A Visitor and Historical Site Study

A thesis submitted in partial fulfillment of the requirements for the Degree of Master of
Arts at Virginia Commonwealth University

By

Alyssa Gay Holland

Longwood University

B.A. in Public History, 2004

Director: Dr. John Kneebone, Associate Professor

Department of History

Virginia Commonwealth University

Richmond, Virginia

December, 2011

**Copyright 2011 by
Alyssa Gay Holland
All rights reserved**

Acknowledgement

The author wishes to thank a number of people. My parents David and Donna Holland and my sister Rachael for their support. My boyfriend Chris Bingham that has been very supportive and patient throughout all our years of trying to complete this thesis. An enormous thank you to Dr. Kneebone for his patience, help and support with this project. The National Park Service, specifically Appomattox Court House National Historical Park, for giving me the opportunity to work for a wonderful institution while finishing my thesis and beyond. All of the site workers and Red Hill National Memorial for allowing me to interview visitors at their site. Finally I wish to thank all my friends, co-workers and doctors that helped me to complete this project.

Table of Contents

Acknowledgements.....	3
Abstract.....	5
Chapters	
I. History of Reconstructing Historical Buildings.....	6
II. Historical Site Interviews.....	31
Images of Historic Sites.....	62
III. Visitor Interviews	84
Images of Red Hill.....	99
IV. Conclusion.....	102
Bibliography.....	107

Abstract

Is It Ethical to Reconstruct a Historical Building: A Public History View.

By Alyssa Gay Holland, M.A.

A thesis submitted in partial fulfillment of the requirements for the degree of Masters in Arts at Virginia Commonwealth University.

Virginia Commonwealth University, 2011

Major Director: Dr. John Kneebone, Associate Professor,
Department of History

The reconstruction of historical buildings has been debated by preservationists, archeologists and historians, both with each other and within their own fields. But no matter how intensely scholars discuss and disagree on the subject, professionals at historic sites still continue to reconstruct historical buildings. The questions surrounding historical reconstruction include: is it ethical to reconstruct historical buildings? Is it worthwhile to reconstruct historical buildings for the benefit of the general public? I surveyed historical site workers from across the country and visitors from Red Hill National Memorial, the last home of Patrick Henry. From the survey, visitors seem to remember where they have seen reconstructions, sometimes what happened to the original buildings and learn about the history and preservation of the historic location. Sites that continue to reconstruct and follow all the preservation laws and regulations and inform the public on why the site reconstructed the building(s) are getting it right.

Chapter One-History of Reconstructing Historical Buildings

Reconstruction, according to *The Secretary of the Interior's Standards for the Treatment of Historic Properties*, is defined as “the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.”¹ The reconstruction of historical buildings has been debated by preservationists, archeologists and historians, both with each other and within their own fields, since the creation of the first major reconstruction project at Colonial Williamsburg in 1926. But no matter how intensely scholars discuss and disagree on the subject, professionals at historic sites still continue to reconstruct historical buildings. The questions raised by surrounding historical reconstruction include: is it ethical to reconstruct historical buildings? Is it worthwhile to reconstruct historical buildings for the benefit of the general public? Why should historical sites spend money on a reconstructed historical building that may or may not be accurately represented? By looking through the history of the preservation and reconstruction of historical buildings, one can understand the controversy over historical reconstruction, which continues even today.

¹ Anne E. Grimmer and Kay D. Weeks, *The Secretary of the Interior's Standards for the Treatment of Historical Properties: Guidelines for Preserving, Rehabilitating, Restore and Reconstructing Historical Buildings*, (Washington, D.C.: U.S. Department of the Interior) 1995; The Secretary of the Interior's Standards for the Treatment of Historical Properties: Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historical Buildings Website. <http://www.cr.nps.gov/hps/tps/standguide/>.

ATTACHMENT C

Preservation of historical buildings in the United States did not begin until the 1850s when women's groups started to save and preserve historical locations such as George Washington's home at Mount Vernon in Virginia.² The reconstruction and or relocation of historical buildings began in the late nineteenth century and aroused little or no opposition. Private groups or individual businessmen started buying historical buildings, dismantling them, and relocating them to world's fairs or to large cities in order to reconstruct them as museums. The main reason for this relocation of historical buildings involved the desire to profit from the resultant tourist trade. From the 1880s through the 1920s, it was very difficult for Americans to travel due to inadequate roads and few could afford to travel great distances or for very long periods of time, meaning that it was nearly impossible to make a profitable tourism business out of most historical buildings on their original sites. It was much easier to dismantle a historical building and move it to a more densely populated area for the main purpose of profit. Unfortunately, the preservation of these buildings did not seem to be the highest priority. Following several world's fairs, many reconstructed buildings disappeared or were allowed to deteriorate far away from their original locations. One example is Libby Prison, originally located in Richmond, Virginia, which operated as a Confederate prison for Union officers during the Civil War. In 1888, W. H. Gray, and an association of other Chicago businessmen, created the Libby Prison War Museum Corporation with the intention of dismantling the building and bringing it to the Chicago World's Fair scheduled for 1893. In 1889, the building was moved to Chicago near where the World's Fair was to be held and reconstructed as the Libby Prison National Museum. By 1899,

² Mount Vernon Ladies' Association was created in 1853 and recognized as the first national preservation organization in America.

14

ATTACHMENT C

when the museum ceased to make a profit, it was sold, dismantled, and pieces of the building were sold off as souvenirs. At this point, sadly, no standards for the preservation or reconstruction of historical buildings existed.³

In the early Twentieth century, a few of the first permanent museums with historical reconstructions included the Hancock Mansion in Ticonderoga, New York; the Benaiah Titcomb House in Newburyport, Massachusetts and the Theodore Roosevelt Birthplace in New York City. The first and third of these historical buildings were reconstructed, with all or mostly new materials, near or on their original sites. The Benaiah Titcomb House was relocated to the nearby town of Essex, Massachusetts.⁴

Before the existence of the National Park Service and formal standards for reconstructing historical buildings, one of the first scholars to discuss historical reconstruction was William Appleton. A pioneer architectural preservationist, Appleton founded the Society for the Preservation of New England Antiquities, now renamed Historic New England, in 1910. Appleton opposed moving a historical building in order for it be reconstructed elsewhere, but was not against utilizing new materials in order to reconstruct a building on its original site for educational purposes.⁵

³ R.W. Wiatt, Jr., *Official Publication #12, Richmond Civil War Centennial Committee, 1961-1965*.

⁴ Charles B. Hosmer, Jr., *Presence of the Past: A History of the Preservation Movement in the United States Before Williamsburg*, (New York: G.P. Putnam's Sons 1965), pp. 146-148, 277-278; Shania Hancock Mansion in Ticonderoga, New York, demolished in 1863 and reconstructed in the mid-1920s as a replica of Thomas Hancock's home, he was the uncle to John Hancock of the American Revolution and President of the Second Continental Congress. The house is now used by the Ticonderoga Historical Society, www.thehancockhouse.org/; *The Benaiah Titcomb House, built c. 1695, forced to dismantle the house and move from Newburyport, Massachusetts to Essex, Massachusetts in the early 1900s; Theodore Roosevelt Birthplace is located in New York City, demolished in 1916 and reconstructed in the early 1920s on the original location.*

⁵ Charles B. Hosmer, Jr., *Presence of the Past: A History of the Preservation Movement in the United States Before Williamsburg*, pp. 12-13; *Historic New England website*, <http://www.historicnewengland.org/about-us/founder-and-history-1>; William Sumner Appleton (1874-1947) Born in Boston, Appleton went to Harvard and became a businessman in real estate. After having a

ATTACHMENT C

The first major reconstruction and restoration projects were started by John D. Rockefeller and Henry Ford. In 1926, Rockefeller and Reverend Dr. W.A.R. Goodwin, the rector of Bruton Parish Church, decided to save what was left of historic Williamsburg, the colonial capital of Virginia. Now called Colonial Williamsburg, the site has restored eighty-eight historical buildings and reconstructed over three hundred and fifty buildings between 1930 and the present; the most recent is the reconstruction of Charlton's Coffeehouse in 2009 and the Anderson Blacksmith Shop and Public Armory currently happening. When preservationists started to discuss the problems with reconstructing historical buildings they often focused on the accuracy and authenticity of the reconstructions at Colonial Williamsburg. Some preservationists and historians felt, especially early on in the preservation process, that Rockefeller only focused on the upper-class homes and trade buildings and not those of lower class citizens, farmers or slaves of Williamsburg. Also, the problem of only focusing on one time period and not the whole life of a town come into play. This is why, in some circles, even with the site beginning to expand in its interpretation and focusing on a broader area of the past, there are those who call Colonial Williamsburg the Disney World of history.⁶ Unlike Rockefeller's method of reconstructing and restoring buildings on the historical site, Henry Ford dismantled and shipped one hundred historical buildings to his 255-acre reserve in Dearborn, Michigan. Ford wanted to create a museum focused on the industrial history of the United States and, by 1933, opened Greenfield Village and the Henry Ford Museum. The establishment of Greenfield Village, as well as other similar

nervous breakdown, he became interested in preserving the historical buildings of New England's past; In 1889, the first statewide historic preservation organization was the Association for the Preservation of Virginia Antiquities (APVA) now Preservation Virginia.

⁶ Tatiana Schlossberg, "Not For the Faint of Heart: Colonial Williamsburg Edition," *The Yale Herald*, March 26, 2010. <http://yaleherald.com/arts/not-for-the-faint-of-heart-colonial-williamsburg-edition/>.

ATTACHMENT C

projects, helped bring into preservation circles the controversy of moving historical buildings from their original foundations. During both of these large preservation projects, no national standards for historical reconstruction yet existed; both locations created and followed their own standards.⁷

In 1916 when President Woodrow Wilson signed the Organic Act, creating the National Park Service, the Department of the Interior administered only twenty-six historical sites.⁸ In 1933, the Government Reorganization Act “provided the authority for an Executive Order that transferred administration of historical and military parks in the custody of various federal departments to the National Park Service.”⁹ Following the consolidation of these historic sites under the control of the NPS, the Park Service accounted for nearly sixty historical and military sites. A new NPS historical division was created about this time to investigate the problems of historic preservation within these historic sites. The Historic Sites Act of 1935 was the first national official act to mandate the preservation of historical buildings. The Act stated “that it is a national policy to preserve for the public use historic sites, buildings, and objects of national

⁷ *Greenfield Village & Henry Ford Museum (Edison Institute), Detroit; A National Register of Historic Places Travel Itinerary.* <http://www.nps.gov/nr/travel/detroit/d37.htm>; The only home at the site that was reconstructed totally from new material was the Patrick Henry House in Colonial Village at Dearborn Inn, MI.

⁸ President Woodrow Wilson signed the Organic Act on August 25, 1916 (39 Stat. F35). It states, “There is created in the Department of the Interior a service to be called the National Park Service, which shall be under the charge of a director. The Secretary of the Interior shall appoint the director, and there shall also be in said service such subordinate officers, clerks, and employees as may be appropriated for by Congress. The service thus established shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified, except such as are under the jurisdiction of the Secretary of the Army, as provided by law, by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” <http://archnet.asu.edu/topical/crm/usdocs/organic.html>.

⁹ *Administrative Policies for Historic Areas of the National Park Service*, (U.S. Department of the Interior: National Park Service) 1973, pp. 22.

ATTACHMENT C

significance for the inspiration and benefit of the people of the United States.”¹⁰ The act states further in section two on preservation: “Restore, reconstruct, rehabilitate, preserve and maintain historic or prehistory sites, buildings, objects, and property of national historical or archaeological significance and where deemed desirable establish and maintain museums in connection therewith.”¹¹ Included within this act for preservation of historical buildings was reconstruction as a preservation method. From the creation of the Historic Sites Act of 1935, the NPS would be the leading authority on the preservation of historical buildings in the United States.

The Historic Act of 1935, section three, required a meeting on historic preservation to take place, and within a year the 1936 Advisory Board for Preservation convened. Chosen by Department of the Interior Secretary Harold Ickes, all board members were “noted historians, archeologists, and preservationists representing all geographical areas of the nation.”¹² The two meetings took place on February 13-14 and May 7-9, 1936. During one of these meetings, Fiske Kimball, an architectural historian,

¹⁰ *Federal Historic Preservation Laws, Preservation of Historic Sites Act, August 21, 1935* (49 Stat. 666; 16 U.S.C. 461-467); *Historic Sites Act of 1935, Public No.292-74th Congress*.
<http://www.blm.gov/heritage/docum/histsite.pdf>.

¹¹ *Federal Historic Preservation Laws, Preservation of Historic Sites Act, pp.461-467*.

¹² *Expansion of the National Park Service in the 1930s: Administration History, L. Appointment and Early Activities of the Advisory Board*. http://www.cr.nps.gov/history/online_books/unrau-williss/adhi5l.htm. This group of eleven included (all jobs mentioned were held at the time of the committee) Edmund H. Abrahams from Savannah, GA, head of the Savannah Commission for the Preservation; Dr. Herbert E. Bolton chairman of the Department of History and Director of Bancroft Library of the University of California, Berkeley; Dr. Hermon C. Bumpus of Duxbury, MA, chairman of the Committee of Museums in the NPS; Mrs. Reau Folk, Nashville, TN, the Regent of the Ladies Hermitage; George Keim of Edgewater Park, NJ, chairman of the State Commission on Historical Sites; Dr. Alfred Kidder, Andover, MA, chairman of Division on Historical Research of the Institute of Washington; Dr. Fiske Kimball of Philadelphia, PA, director of the Pennsylvania Museum of Art; Archibald McCrea, Williamsburg, VA, restorator of Carter’s Grove; Dr. Frank Oastler, New York City, member of former Educational Advisory Board, NPS; Dr. Clark Wissler, New York City, Curator of Ethnology at the American Museum of Natural History and Professor of Anthropology in the Institute of Human Relations at Yale.

ATTACHMENT C

thought reconstructions should appear aged to match the fabric of the rest, if any, of the original buildings in a particular location. Kimball stated that, “we should rebuild destroyed buildings on important historic sites. Even the ruins are more interesting, when used in a restoration.”¹³ Verne Chatelain, the first Chief Historian of the National Park Service, argued that instead of reconstructing historical buildings for interpretative purposes an alternative way of interpreting sites must be found. Chatelain’s fear was that a historical reconstruction would only focus on “one time period” and leave the remaining history to be forgotten.¹⁴ In 1937, the committee drafting the NPS policy on preservation decided the preferred order of preservation: “Better to preserve than repair, better to repair than restore, better to restore than construct.”¹⁵ The reconstruction discussion continued after these initial meetings. In 1938, Robert F. Lee, the second Chief Historian for the NPS, fought against the reconstruction of the McLean House at Appomattox Court House National Historical Park where Confederate General Robert E. Lee surrendered his army to Union General Ulysses S. Grant. Robert F. Lee believed that a “model” or paintings should be used as alternative interpretive tools instead of reconstructing the McLean House.¹⁶ The reason Lee had to yield his anti-reconstruction view was due to local political pressure that Lee later called the “second surrender of Lee at Appomattox.”¹⁷

¹³ Barry Mackintosh, “To Reconstruct or Not to Reconstruct: An Overview of Policy and Practice,” *Resource Management Bulletin*, 13 (1990): 5-7, 14.

¹⁴ Advisory Board Minutes, 7-9 May 1936, National Register, History, and Education (NRHE files).

¹⁵ Barry Mackintosh, “To Reconstruct or Not to Reconstruct: An Overview of Policy and Practice,” 5.

¹⁶ Barry Mackintosh, “National Park Service Reconstruction Policy and Practice.” *The Reconstructed Past: Reconstruction in the Public Interpretation of Archeology and History*, ed. John Jameson, Jr. (Walnut Creek, CA: AltaMira Press, 2004).

¹⁷ Mackintosh, “To Reconstruct or Not to Reconstruct: An Overview of Policy and Practice,” 7.

ATTACHMENT C

The disputed about the McLean House settled little, and the discussions over reconstructing historical buildings continued. In 1955, the National Park Service decided to update the 1935 Historic Sites Act for preservation. If historians, preservationists and archeologists wanted to remove reconstruction from the preservation act this would have been the time to do it. But section two, section f of this act, still stated, “Restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance and where deemed desirable establish and maintain museums in connection therewith.”¹⁸

The Secretary of the Interior’s policies continued to include reconstruction as a preservation method. The National Historic Preservation Act of 1966 in Title one, section 101-3 states, “the term ‘historic preservation’ includes the protection, rehabilitation, restoration, and reconstruction of districts, buildings, and objects significant in American history, architecture, archeology, or culture.”¹⁹ In 1968 and later revised in 1973, the National Park Service compiled and published an updated preservation document, *Administrative Policies for Historical Areas of the National Park System*. In the area of historical structures, it states the only times reconstruction should be allowed: First, when “all or almost all traces of a structure have disappeared and its reconstruction is essential for public understanding and appreciation of the historical associations for which the park was established.”²⁰ Second, when “sufficient

¹⁸ *A Brief History of the National Park Service*. www.nps.gov/history/history/online_books/kieley23.htm; The 1955 Preservation Act is, “to provide for the preservation of historical sites, buildings, objects, and antiquities of national significance, and for other purposes.”

¹⁹ National Historic Preservation Act 1966 (80 Stat. 915).
www.nps.gov/history/history/online_books/anps/anps_6e.htm

²⁰ *Administrative Policies for Historic Areas of the National Park Service*, pp.28.

ATTACHMENT C

historical, archeological, and architectural data exist to permit an accurate reproduction.”²¹ Third, “the structure can be erected on the original site or in a setting appropriate to the significance of the area, as in a pioneer community or living farm, where exact sites of structures may not be identifiable through research.”²²

The National Park Service’s *Cultural Management Policies of 1975* did restrict reconstruction in order to protect the archeology of a site. Reconstructions are only allowed when: “1. There are no significant preservable remains that would be obliterated by reconstruction. 2. Historical, archeological, and architectural data are sufficient to permit an accurate reproduction with a minimum of conjecture. 3. The structure can be erected on the original site. 4. All prudent and feasible alternatives to reconstruction have been considered, and it is demonstrated that reconstruction is the only alternative that permits and is essential to public understanding and appreciation of the historical and cultural association for which the park was established.”²³

In the mid-1970s, too, a new type of reconstruction began to emerge which the NPS and several private sites have used over time as an alternative to a full historical building reconstruction. At Franklin Court, the site of what was Benjamin Franklin’s house in Philadelphia, the NPS placed a “ghost structure” where the building was originally located. Franklin built the house between 1763 and 1765; and lived there with his wife and son when he was in Philadelphia. Franklin died in the house in 1790, and it was later torn down to make way for row houses. In June 1948 Independence National Historical Park was created and took over operation of the site. In the 1950s the National Park Service rejected the idea of reconstructing a historical building on the site. With a lack of contemporary information describing the layout of the structure and having only archeology as evidence the NPS decided on a metal 3-D “ghost structure.”

²¹ Ibid, pp.28.

²² Ibid, pp.28-29.

²³ National Park Service Management Policies, Chapter 5, 1975, pp.16-17.

ATTACHMENT C

The “ghost structure” shows the visitor the outline of the building and its dimensions without the expense, intense research, and necessary maintenance of a fully reconstructed building. Independence National Historical Park decided to bring in the well-known firm of Venturi and Rauch (now known as Venturi, Scott Brown and Associates) as the architects for the project, and from 1972 to 1976 they created two structures outlining the building as archeologists think it would have looked while Franklin was living there. At the bicentennial of the American Revolution in 1976 the area opened to the public.²⁴

Nonetheless, Richard Sellers and Dwight Pitcaithley’s article, “Reconstruction—Expensive, Life Size Toys” in the NPS’s *Cultural Resource Management Bulletin* in December 1979, stated that the National Park Service must not do reconstructions.

Sellers and Pitcaithley’s reasons for not reconstructing were “philosophical, economical

²⁴*Independence NHP Archeology at Franklin Court*. Archeology Program, National Park Service, U.S. Department of the Interior. <http://www.nps.gov/archeology/sites/npSites/franklincourt.htm>; Frank Matero, “Ben’s House: Designing History at Franklin Court, Philadelphia,” *Archeology Institute of America*. http://www.archaeological.org/pdfs/sitepreservation/Matero_2010_v.6.pdf; Pole Green Church, in Hanover County, VA, was originally built in 1755 and is where the first Southern Presbyterians met. In 1864, during the Civil War, the Church burned after an artillery shell went through the building. In 1990 the Pole Green Church Foundation wanted to protect the site. After archeology, the Pole Green Foundation decided that instead of reconstructing the site it would place a hanging “ghost structure” of the building up. Wolstenholme Towne was a seventeenth century settlement near Jamestown, Virginia. In 1622, Wolstenholme Towne, part of Martins Hundred of James City County, VA, was one of many sites attacked by Indians during the Anglo-Powhatan Wars. The Indians chased off or killed most of the population of that site and it was completely abandoned by 1645. In 1975, Ivor Noel Hume, the father of archeology, was conducting archeology on the site looking for 18th century support buildings for Carter’s Grove 18th plantation and randomly found the site. After eight years of research on the site, Colonial Williamsburg built a partial ghost reconstruction of the palisades and buildings on the site. Personally, the partial reconstructions, such as the Franklin House with the large metal “ghost structure” frames are just unattractive overall and I am not a fan. A painting or a 3D computer animation program would show the public great detail. But if a site chooses this alternative to reconstructing the entire building, wooden partials, though harder to maintain, personally look natural compared to their metal counterparts. Andersonville National Historical Site in Georgia and Wolstenholme Towne in Virginia both have wooden examples of partial “ghost structures.”

ATTACHMENT C

and practical.”²⁵ In addition, they argued that reconstructions illustrate how the past may have appeared, but “not how it did look,” that these reconstructions take away from the original locations or buildings on site, and that the “structures are not historic.”²⁶ The authors called the popularity of reconstructions the result of the “Williamsburg Syndrome.”²⁷ Charles Bohannon, one of the regional archeologists for the National Park Service, wrote a letter to the editor of the *Cultural Resources Management Bulletin* in December 1979 disagreeing with the Sellers and Pitcaithley article. In the letter, Bohannon contended, “there are instances where reconstructions are desirable and justifiable.” In terms of “historical integrity,” Bohannon stated, “some properties have more than others, but only rarely could one state that a well reconstructed site possesses it or lacks it totally.” Bohannon also disagreed with Sellers and Pitcaithley’s statements that reconstructions are “expensive life-size toys, manufactured for children of all ages who have forgotten how to read.”²⁸ Bohannon believed that the National Park Service was created first and foremost for public education and enjoyment.

In 1981, the NPS went in the direction of taking reconstruction completely out of methods for historic structure preservation with the creation of the Service’s *Cultural*

²⁵ Richard Sellers and Dwight Pitcaithley, “Reconstruction—Expensive, Life Size Toys.” *Cultural Recourse Management Bulletin*, December 1979; John H. Jameson, Jr. ed., *The Reconstructed Past: Reconstructed in the Public Interpretation of Archaeology and History*. New York: Alta Mira Press, (2004). Dwight Pitcaithley is a professor of the University New Mexico State and is a retired Chief Historian of the National Park Service.; Dr. Richard Sellers is a former historian for mainly what is now called the Pacific West Region of the National Park Service.

²⁶ Sellers and Pitcaithley, “Reconstruction—Expensive, Life Size Toys.”

²⁷ *Ibid.*

²⁸ Letter to Mr. Douglas Caldwell from Charles F. Bohannon, April 25 1980. Pitcaithley Reconstruction Files, National Park Service HC RG 63.; Charles F. Bohannon at the time was the regional archeologist for what is now the Pacific West region of the National Park Service.

23

ATTACHMENT C

Resources Management Guidelines or the NPS-Directors Order 28 (NPS-28).²⁹ Within the NPS-28 it stated, “the Service does not endorse, support, or encourage the reconstruction of historic structures.”³⁰ Rodd Wheaton endorsed this view in September 1985 when he presented a paper at the annual meeting of the Association for Preservation Technology entitled, “To Reconstruct or Not Reconstruct: Decision Within Documentation,” in which the author criticized the reconstruction of Fort Union on the Montana-North Dakota state line. Wheaton believed that the NPS did not have the documentation to reconstruct the fort and lacked the necessary funds for research and maintenance, all this at a site already plagued with preservation issues.³¹

William Penn Mott, Jr., who became the NPS director in 1985, disagreed with the anti-reconstruction views. Mott’s main focus on interpretation and education within historic sites forced the Park Service to revise the anti-reconstruction views within NPS-28. According to 1988 management policies, a historical building that has vanished may be reconstructed if:

1. Reconstruction is essential to permit understanding of the cultural associations of a park established for that purpose.
2. Sufficient data exists to permit reconstruction on the original site with minimal conjecture.
3. Significant archeology resources will be preserved in situ or their research values will be realized through data recovery.
4. A vanished structure will not be reconstructed to appear damaged or ruined.
5. Generalized representations of typical structures will not be attempted.³²

²⁹ *NPS-28 Cultural Resource Management Guideline.*

http://www.cr.nps.gov/history/online_books/nps28/28contents.htm.; This NPS Management Policy states the basic principles of governing the management of cultural resources that include archeological resources, cultural landscapes, historical structures, museum objects and ethnographic resources.

³⁰ Rodd Wheaton, “To Reconstruct or Not Reconstruct: Decision Within Documentation,” paper presented at the annual meeting of the Association for Preservation Technology (September 1985), Pitcaithley Reconstruction Files, Harpers Ferry Center, Harpers Ferry, WV. pp.5; Rodd Wheaton was an architect for the National Park Service and is now working for The Collaborative Inc, a historic preservation group based in Boulder, CO.

Berry Mackintosh, “To Reconstruct or Not to Reconstruct: An overview of NPS Policy and Practice.” *CRM* 13(1990) 5-7.

³¹ Rodd Wheaton, “To Reconstruct or Not Reconstruct: Decision Within Documentation.” pp. 5.

³² National Park Service, Management Polices, Chap. 5, pp. 7, 1988.

The debate continued. In 1990, Dr. William Hunt wrote a letter to the editor of *Cultural Resources Management* about his involvement with the reconstruction of Fort Union. Hunt personally opposed reconstructions and believed that placing a reconstruction “on-site” of the original building was unethical. Hunt believed that the reconstruction of Fort Union:

had both bad and good components. On the negative side, much of the nationally important archeology resource at Fort Union Trading Post National Historic Site has been destroyed. On the positive side, the public now has a beautifully and carefully reconstructed mid-19th century fur/robe trading post to visit...Nevertheless, from an overall perspective, I believe the positive contributions at Fort Union Trading Post have outweighed the negative.³³

In the same issue of *CRM*, Dr. Paul Huey, an archeologist for the state of New York, wrote a letter disagreeing with Hunt’s judgment about the reconstruction of Fort Union. Because “reconstruction unavoidably requires major destruction of archeology resources,” Huey asked,

wouldn’t it have been preferable to preserve as much of the archeological evidence as possible? Carefully planned, limited excavations to answer specific questions could have provided useful data in order to build a diorama or model, perhaps, for a comprehensive interpretive exhibit. Historical knowledge of a site based on archeology is a matter of degree and is never absolute.³⁴

³³ Dr. William Hunt, Letter to the Editor, *Cultural Resources Management*, 13(1990) At the time of the article William Hunt was a supervisory archeologist for the Midwest Archeological Center, National Park Service.

³⁴ Dr. Paul Huey, Letter to the Editor, *Cultural Resources Management*, National Park Service, Vol. 13: No.1, 1990. At the time of the article Huey was a Senior Scientist (Archeology) for the Bureau of Historic Sites, Historic Preservation Division, New York State Office of Park, Recreation and Historic Preservation, pp. 2.

25

ATTACHMENT C

Huey went on to state that Fort Union was an active fort from 1828 to 1867 but that the reconstruction indicated that there was only “one Fort Union....History, in my estimation, needs to be interpreted as a process of change and development, not a single static moment in time.”³⁵

Paul Hedren, who was the superintendent of Fort Union during the reconstruction period of the mid-1980s, acknowledged that even well planned and executed reconstructions “are nothing more than crass manipulations of historic environments. Yet, the National Park Service has long had this bent.”³⁶ The policies of the 1970s restricted but did not ban NPS reconstructions, and the NPS has long changed the “natural environment through wildland fire programs, the reintroduction of native species and the elimination of exotic species. ...The parallels are patently relevant in historical contexts.”³⁷ He agreed, too, that “reconstructions are expensive to create” and to maintain, but all facilities within a park have to be maintained and visitor centers built. Money must be spent anyway. Without Fort Union being rebuilt, Hedren stated, “the alternative was a grassy meadow at the end of a gravel road.”³⁸

Hedren’s argument notwithstanding, throughout the 1990’s, Barry Mackintosh, a historian with the NPS, who wrote articles and letters in the *CRM* opposing reconstructions, did go on to say that the only time reconstruction within the National Park Service is acceptable is if the reconstructions, such as those at Appomattox Court House National Historical Park in Virginia, “are not stand alone attractions; rather, they

³⁵Huey, Letter to the Editor, Cultural Resources Management, National Park Service, Vol. 13: No.1, 1990.

³⁶ Paul Hedren, “Why We Reconstructed Fort Union” *The Western Historical Quarterly*, 23 (Aug., 1992): 349-354.

³⁷ Hedren, “Why We Reconstructed Fort Union,” pp. 353.

³⁸ *Ibid*, pp. 353.

fill key gaps in a historic complex, like the Capital and Governor's Palace at Colonial Williamsburg."³⁹

In the *CRM* in 1992, Rodd Wheaton wrote "Considering Reconstruction as an Educational Tool," in which he discussed the educational value of reconstructing historical buildings. Wheaton had changed some of his thoughts over time. In his earlier paper, "To Reconstruct or Not to Reconstruct: Decision Within Documentation," he stated that the Park Service left holes in NPS-28 in order to allow reconstructions while not officially "endorsing" them. He also argued that the pressure from outside sources, such as Congress, could push through a reconstruction without following the NPS-28 guidelines. "Congress does not recognize reconstructions as a philosophical issue," he said.⁴⁰ Wheaton now promoted reconstructions "for the visitors and their education about our past national history. It is incumbent on the National Park Service to consider the best possible opportunities for that interpretation."⁴¹

In June 1994, the *American Anthropologist* printed an article by Edward Bruner entitled "Abraham Lincoln as Authentic Reproduction: A Critique of Postmodernism." According to Bruner's essay, postmodernist thinkers wrongly believe that contemporary historic reconstructions are phony, that it is unnecessary to teach history to the masses because people are too unintelligent to understand their past, and that most historical sites are in business for monetary reasons only. Defending work at historic sites, Bruner states:

In postmodern writings, contemporary American tourist attractions tend to be described [in terms of]...the inauthentic constructed nature of the sites,

³⁹ Mackintosh, "The Case Against Reconstruction."

⁴⁰ Rodd Wheaton, "To Reconstruction or Not To Reconstruct: Decision Within Documentation," pp. 15.

⁴¹ Rodd Wheaton, "Considering Reconstruction as an Educational Tool," *Cultural Resource Management*, Vol.15: No.1, 1992.

ATTACHMENT C

their appeal to the masses, and their efforts to present a perfect image of themselves. This narrow and distorted view fails to account for the popularity and frequency of such sites [and]...imposes an elitist politics blind to its own assumptions.⁴²

Finally, in 1995 the National Park Service published *The Secretary of the Interior's Standards for the Treatment of Historical Properties: Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historical Buildings*.⁴³ This compilation of updated preservation rules and regulations states:

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property. 2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such sources must be disturbed, mitigation measurements will be taken. 3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships. 4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will recreate the appearance of the non-surviving historic property in materials, design, color and texture. 5. A reconstruction will be clearly identified as a contemporary re-creation. 6. Designs that were never executed historically will not be constructed.⁴⁴

⁴² Edward M. Bruner, "Abraham Lincoln as Authentic Reproduction: A Critique of Postmodernism," *American Anthropologist* 96 (2) 397-415.; Edward M. Bruner is a Professor Emeritus of Anthropology at the University of Illinois at Urbana-Champaign.

⁴³ "Title 36—Parks, Forests and Public Property, Chapter 1 National Park Service, Department of the Interior; Part 68—The Secretary of the Interior's Standards For the Treatment of Historic Properties." *Director's Order #28: Cultural Resource Management*. National Park Service. <http://www.nps.gov/policy/DOrders/DOrder28.html>.

http://www.access.gpo.gov/nara/cfr/waisidx_05/36cfr68_05.html. It is part of the NPS-28 Cultural Resource Management Guideline for the National Park Service.

⁴⁴ Kay D. Weeks and Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historical Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historical Buildings*, (Washington, DC: National Park Service), 1995.

ATTACHMENT C

Three years later, in 1998, the architectural critic Ada Louise Huxtable wrote *The Unreal America: Architecture and Illusion*, in which she stated that places such as Colonial Williamsburg provide the “replacement of reality with selective fantasy” and are very similar to “Disney-like theme parks.” She argued that a number of buildings, historical in their own right, were destroyed for the reconstruction of a “fake” building. Huxtable’s main example is Colonial Williamsburg where over seven hundred buildings were destroyed to be replaced by reconstructed buildings from the “right” time of 1770.⁴⁵

In the same year, Michael James Kelleher wrote a thesis on “Making History: Reconstructing Historic Structures in the National Park Service,” in which he explored four major reconstruction projects from the 1970s to the mid-1990s. Continuing with the anti-reconstruction views, Kelleher agreed with NPS Historian Barry Mackintosh, who stated in 1991 that the “basic rationale for the Service’s involvement with historical areas has been interpretation, not preservation.”⁴⁶ “If historic sites in the National Park Service are valued more for their interpretative potential than for the importance of the resources they contain, it is easy to understand why the Park Service has been willing to actually destroy authentic historic resources [archeology] in order to carry out a reconstruction.”⁴⁷ Despite all of the disagreements over reconstructions at Fort Union, Fort Smith, Fort Stanwix and Bent’s Old Fort, the NPS did not remove reconstruction from the Secretary of the Interior’s standards. Kelleher states that when National Park professionals decide

⁴⁵ Ada Louise Huxtable, *The Real America: Architecture and Illusion*, (New York: New Press) 1998 pp. 15-17; Ada Louise Huxtable was the chief architecture critic for the New York Times from 1963 to 1982.

⁴⁶ Barry Mackintosh “Interpretation: A Tool for NPS Expansion,” (unpublished manuscript, 1991), pp. 3. Personal files of Barry Mackintosh, National Park Service.

⁴⁷ Michael James Kelleher, “Making History: Reconstructing Historic Structures in the National Park Service,” University of Pennsylvania, Unpublished Thesis, 1998.

http://www.archive.org/stream/makinghistoryrec00kell/makinghistoryrec00kell_djvu.txt

ATTACHMENT C

they want to reconstruct historical buildings they “should ask themselves if the recreation of history is actually the mission of the National Park Service.”⁴⁸

In 2004, John H. Jameson edited a collection of papers entitled *The Reconstructed Past: Reconstructions in the Public Interpretation of Archaeology and History*. This collection was mostly compiled from the 1997 Society for American Archaeology symposium in Seattle, Washington, and concerns the reconstruction of historical buildings. A mixture of archeologists, preservationists, and historians presented positive and negative views about reconstructing historical buildings, the educational and interpretive values of such efforts, and the place of archeology in the reconstruction process. Dwight Pitcaithley, chief historian of the NPS, wrote the introduction to the work, stating that “reconstructed buildings do provide a three-dimensional pedagogic environment in which visitors can acquire a heightened sense of the past. But this is true only in those cases where the structure is rebuilt with a minimum of conjecture. Weighing the appearance of the reconstruction against the historical evidence available to guide the reconstruction is no easy task. Yet until one does that, one cannot judge the value of the effort.”⁴⁹ In the third chapter, Barry Mackintosh charged that reconstructions, especially those on site, have “damaged and destroyed archaeological resources.”⁵⁰ The Park Service creates and maintains policies to prevent many reconstructions from occurring but does not always adhere to its own policies. “By its nature, policy is subject to the discretion of agency managers,” he wrote. “Their

⁴⁸ Kelleher, *Making History: Reconstructing Historic Structures in the National Park Service*, 112.

⁴⁹ John H. Jameson, ed., *The Reconstructed Past: Reconstructions in the Public Interpretation of Archaeology and History*, (New York: AltaMira Press, 2004), pp. ix-x.

⁵⁰ Barry Mackintosh, “To Reconstruct or Not to Reconstruct: An Overview of NPS Policy and Practice.” *CRM* Vol. 13: No1 1990; Barry Mackintosh, “National Park Service Reconstruction Policy and Practice” in *The Reconstructed Past: Reconstructions in the Public Interpretation of Archaeology and History*, ed. John H. Jameson, pp.73; Barry Mackintosh worked for the National Park Service from 1965-1999 as historian at several parks then moving up to historian for the NPS.

ATTACHMENT C

commitment to it will inevitably vary with the public and political pressure attended on a public agency. With strong civil and congressional support, the Fort Union Trading Post reconstruction proceeded despite the policies in effect at its inception.”⁵¹

In 2009, *The Public Historian* conducted an interview with Mike Caldwell, then Superintendent of Fort Stanwix National Monument. Caldwell discussed the administrative history of the site and how he believed that the town and local politicians were the main reason for the reconstruction of the fort. Caldwell stated that, “We [Fort Stanwix and the NPS] found that the creation of Fort Stanwix had clearly been a partnership effort long before the term was ever used as it is in the National Park Service now.” He continues, “A city [Rome] in upstate New York where something very significant historically had happened requested and gave to the National Park Service, sixteen acres in the heart of its downtown to reconstruct its site the fort—as part of a larger urban renewal project.” Caldwell does go on to say that Congressmen and locals caused the main push for this fort to be reconstructed in the middle of the downtown. Though several people from Rome stated that the fort was a failure, in terms of bringing major economic stimulus to the city, a number of people still support the reconstructed fort and the NPS. Caldwell’s main point in the article was that administrative histories of NPS sites are very important for future administrators to have so they can understand what has happened in their park’s past, including reconstructions, and learn from mistakes that may have been made.⁵²

⁵¹ Barry Mackintosh, “National Park Service Reconstruction Policy and Practice,” *The Reconstructed Past: Reconstructions in the Public Interpretation of Archaeology and History*, pp. 73.

⁵² Mike Caldwell, “The Fort Stanwix Administrative History: A Superintendent’s Perspective,” *The Public Historian*, Vol. 31, No. 2 (May, 2009) pp.66-70.

ATTACHMENT C

The newest alternative to physical reconstructions of historical buildings, 3-D animation, began in the mid-2000s. First introduced overseas, several historical sites have begun using this alternative to reconstruction within the United States as well. Fort Laramie National Historic Site in Wyoming is one of the NPS locations using this 3D preservation technology. The 3D images allow visitors to view surviving historic buildings through different time periods as well as archeological sites that have not had a building on them for hundreds of years. In 2009, the NPS, CyArk and the Center of Preservation Research, run by the University of Colorado in Denver, all teamed up to bring this project to life. Fort Laramie Digital Preservation, an online resource, currently has five buildings that have been placed in 3D animation to view in greater detail both the exterior structure as well as the interior.⁵³

The question of reconstructing historical buildings will most likely always be argued by the scholars and professionals who helped create and maintain the preservation standards for reconstructing historical buildings. The NPS, a leader in preservation, continues to reconstruct to the standards these scholars and professionals have helped the agency to set. I personally believe that as long as a historical site follows the standards put in place by the NPS, the reconstruction should be accepted as ethical. But how do workers at historic sites or even visitors feel about the reconstruction of historical buildings?

⁵³ *Fort Laramie National Historic Site Digital Preservation*. <http://archive.cyarch.cyark.org/fort-larmie-intro>; Fort Laramie National Historic Site. www.nps.gov/foia/index.htm Fort Laramie National Historic Site is located in Wyoming. Originally the site was used as a fur trading post under the names of Fort Williams in 1834 and then Fort John in 1841 on the Missouri River and Oregon Trail. In 1849, the United States Army purchased the fort from the American Fur Company and changed the name to Fort Laramie to use a military facility. In 1890 the fort was decommissioned. Other historic sites in the United States that have used this technology: (by CyArk Projects) Mesa Verde National Park in Colorado; Presidio of San Francisco within Golden Gate Recreation Area in California; Tudor Place in Washington, D.C.; (not CyArk) Historic Jamestowne part of Colonial National Historical Park in Virginia.

ATTACHMENT C

I became interested in this subject while working as a Park Guide at Appomattox Court House National Historical Park. This site has several reconstructed buildings, including one representing the McLean House where Confederate General Robert E. Lee surrendered the Army of Northern Virginia to Union General Ulysses S. Grant. In 1891, Captain Myron Dunlap of Niagara Falls, New York, invested in the McLean House with the intention of dismantling the building and displaying it at the Chicago World's Fair scheduled for 1893. When this plan fell through, Dunlap created the Appomattox Land Company and decided to dismantle the McLean House and relocate it to Washington, D.C., in order to create a Civil War museum. The company made photographs and blueprints of the home and began the dismantling process. Unfortunately, the Panic of 1893 put the company out of business, leaving the structure in its dismantled state. For the next forty-seven years the house remained in pieces on site; meanwhile eager souvenir hunters, and locals looking for free building materials and elements, slowly obliterated the original materials. The National Park Service took over the site in 1935 and after World War II began the reconstruction process. Only after buying and examining the blue prints and photographs and looking over the archeological data did the site begin reconstruction. Completed in the spring of 1949, the McLean House was dedicated and opened to the public in April 1950. The reason for reconstructing the McLean House remains clear: the house and the event that occurred inside is the main house reason the park exists. In other words, without the McLean house the site would be incomplete.⁵⁴

⁵⁴ "McLean House Reconstructed Assured" in *The Regional Review*, Vol. 5 No. 6, (Dec. 1940); *Appomattox Court House National Historical Park*. National Register of Historic Places, United States Department of the Interior, National Park Service; McLean House at Appomattox Court House NHP. <http://www.nps.gov/apco/mclean-house.htm>; Appomattox Court House National Historical Park

ATTACHMENT C

During the fall of 2006 when, standing inside the McLean House, I was accosted by a female visitor who stomped into the house and proceeded to question me about why the building had been dismantled by the government. Many people automatically assume that the National Park Service, or another department of the federal government, relocated the house. After calming this visitor down, I began my interpretation regarding the background of the house, what happened to it, and the fact that the NPS did not even come into existence until 1916. Therefore, the park had nothing to do with the dismantling of the McLean House or anything to do with the site until the late 1920s. Then I asked her what she thought about the Park Service reconstructing the McLean House or any other buildings on site. By this point, the visitor's attitude had changed dramatically from hostility to understanding; she stated that it was entirely appropriate for us to reconstruct the house in order for visitors to understand and visualize what took place in the parlor on April 9, 1865. I asked several other visitors how they felt about the reconstructed buildings on site. From this I decided to research and discover whether or not anyone else had asked visitors what they thought of the reconstruction of historical buildings. I discovered that no one had done significant research on visitors and their opinions on historical reconstructions.⁵⁵

Handbook (U.S. Department of the Interior: Washington, D.C.), 112-113; The structure was originally built in 1848 by the Raine family as a tavern guest house, Wilmer McLean bought the property in the fall of 1862 to use as a private residence for his wife Virginia and their children. McLean gave Union and Confederate officers permission to use the building for the surrender meeting. The house was also used as a headquarters by General Gibbon of the 24th Corps of the Union Army of the James. After the war, McLean defaulted on loans and had to give up the property in 1867, the McLeans were forced to leave when the bank put the property up for auction. From 1872-1891 the Ragland family owned the property until Captain Myron Dunlap and the Appomattox Land Company bought the property.

⁵⁵ The interpretation of the McLean House often includes explaining what happened to the original house and why it was reconstructed. The park also has a sign in front of the McLean House explaining to the visitor what happened to the house. In addition, an exhibit inside the visitor center on the reconstruction and restoration of the village and information in the park pamphlet furthers the visitor's understanding of the reconstruction.

ATTACHMENT C

Along with the information collected from visitors, I decided to research how employees at historic locations felt about reconstructing historical buildings. This would include interviewing individuals that had worked at or are currently working at a historical location with reconstructions. There are some articles written on the subject from the perspective of historic site employees but almost none concern the point of view of the visitor.

Very few researchers have taken surveys of people in the field of history, let alone regarding reconstruction of historical buildings. Just to find a method for collecting and producing statistics was difficult. Eventually I decided to formulate my questions with the help of Roy Rosenzeig's and David Thelen's book, *The Presence of the Past*. Rosenzeig and Thelen used a series of surveys from the Institute of Social Research in Bloomington, Indiana, funded by the National Endowment for the Humanities, to discover "how people understand and use the past in their everyday lives."⁵⁶ I followed Rosenzeig and Thelen's method to formulate my questions for both site employees and visitors. Rosenzeig and Thelen used a method of asking "broadly framed questions" but believed that questions which received a "yes and no" answer would still help overall research of how people felt about history or "past-related activities."⁵⁷

The second chapter consists of interviews with historic site staff. Over an eight month period, I contacted more than one hundred historic sites asking to interview anyone who had regular visitor contact. Thirty-five workers, several from the same site, returned written responses, allowed for an interview on site, or responded via phone conversation. Ten questions were asked of each participant. The questions asked how

⁵⁶ Roy Rosenweig and David Thelen. *The Presence of the Past: Popular Uses of History in American Life*. Methodological Appendix. <http://chnm.gmu.edu/survey/procedures.html>.

⁵⁷ Rosenweig and Thelen. <http://chnm.gmu.edu/survey/procedures.html>.

ATTACHMENT C

the respondent felt regarding the ethics of reconstructing a historical building, either on their site or another, and addressed other issues involving the reconstruction process itself and its purposes. I tried to focus on locations that have buildings that were reconstructed or relocated after 1930.

The third chapter consists of visitor interviews conducted at Red Hill plantation, Patrick Henry's home near Brookneal, Virginia. Patrick Henry's home was a one and a half story building originally built in the 1770s and reconstructed in 1957. In 1986, the site was designated by Congress as the Patrick Henry National Memorial. The site, however, does not receive any federal funds and is run by the Patrick Henry Memorial Foundation. From December 5, 2009, to March 1, 2010, site employees and I handed out surveys (see appendix for a full survey form) to visitors at Red Hill. During this time, twenty-eight surveys, out of the fifty-eight distributed, were sent back to me.⁵⁸

The reconstruction of historical buildings, in my opinion, must be on a case-to-case basis. If a historic site decides to reconstruct it needs the following four steps. First, accept *The Secretary of the Interior's Standards for the Treatment of Historical Properties: Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historical Buildings*. Second, the historical building being reconstructed should be the main supporting building(s) within the story of the site such as the McLean House at Appomattox Court House NHP. Third, a copious amount of information on the structure, including paintings, pictures, archeology, blue prints, etc., should be required before

⁵⁸ Mark Couvillon, *Patrick Henry's Virginia: A Guide to the Homes and Sites in the Life of an American Patriot*, 2001; Support buildings for the plantation include slave quarters, smokehouse, greenhouse, ice house, law office, tobacco curing barn, carriage house, blacksmith shop and kitchen. When Patrick Henry passed away in the house in 1799, the plantation stayed within the Henry family. Sections were added on in 1833 by John Henry and in 1911. In 1919, the Henry House burned to the ground and was reconstructed in 1957 with private funds.

ATTACHMENT C

reconstruction can commence. Fourth, if the decision was made to reconstruct, the necessary money for the reconstruction and for the resultant building's long term maintenance must always be committed and continued. Without all the information, without the proper amount of money, and without the original structure being a primary historical location, I would be completely opposed to reconstruction.

With the scholarly and professional views of historical reconstruction assessed and the history of preservation and reconstruction standards in the United States explored, its time to find out what site employees and visitors think concerning the pros and cons of reconstructing historical buildings. Within the following chapters, queries of site employees and visitors will provide insight into the thoughts and feelings of these long neglected sources of opinion on the subject.

Chapter Two- Site Worker Interviews

In chapter one, we explored the history of professionals' and scholars' thinking on the reconstruction of historical buildings. Chapter two reports on interviews from historical site employees who had or were currently working with the public at sites that have reconstructed or were in the process of reconstructing historical structures. Middle to upper level personnel at historical sites throughout the country decide what they will interpret, how they will interpret the historical information, and what buildings they will preserve for the public. The discussion and decisions over reconstructing historical buildings are implemented at this level. In this chapter the focus will be on questions sent by email or phone as well as site interviews at historic locations.

Initially around one-hundred twenty-five historical sites were contacted. This included local, state, non-profit and federal historical sites all across the country. After sending out letters and emails to all of the sites, thirty-six responded via phone, e-mail and or face to face interviews, with multiple interviewees at some sites. The chapter is divided into three main sections. First, the author discusses those sites and their employees who evince a pro-reconstruction attitude and their reasons for supporting said reconstruction. Secondly, informants at the sites who said that it depended on the situation as to how they would feel about reconstructing historical buildings. Third, site employees who remain anti-reconstruction in outlook are allowed to explain their viewpoints and opinions on the matter.

ATTACHMENT C

For historical sites I interviewed individuals from or about thirty-three sites in person, by phone, email and on-site. In some cases, multiple persons from the same site responded. Sites were spread out all over the country. The sites included:

Site Name	Operated By	Location
Hickory Hill and the Tom Watson Birthplace	non-profit Watson-Brown Foundation	Thompson, GA
Old Sturbridge Village	private group	Sturbridge, MA
Pennsbury Manor	State of PA	Morrisville, PA
Valley Forge National Historical Park	National Park Service	Valley Forge, PA
Fort Stanwix National Monument	National Park Service	Rome, NY
Bent's Old Fort National Historical Site	National Park Service	La Junta, CO
Antietam National Battlefield	National Park Service	Sharpsburg, MD
San Antonio Missions National Historical Park	National Park Service	San Antonio, TX
Alamance Battleground State Historic Site	State of North Carolina	Burlington, NC
Jamestown Site at Colonial National Historical Park	National Park Service/APVA or Preservation Virginia	Williamsburg, VA
Herbert Hoover National Historical Site	National Park Service	West Branch, IA
Fort King George State Park	State of Georgia	Darien, GA
Fort Halifax State Park	State of Maine	Winslow, ME
Montpelier: The Home of Henry Knox	non-profit	Thomaston, ME
Wade House	State of Wisconsin and a non-profit group	Greenbush, WI
Morristown National Historical Park	National Park Service	Morristown, NJ
Mackinac State Historical Site	State of Michigan	Mackinaw, MI

ATTACHMENT C

George Washington Birthplace National Monument	National Park Service	Washington's Birthplace, VA
Cahokia Courthouse State Historical Site	State of Illinois	Cahokia, IL
Ocmulgee National Monument	National Park Service	Macon, GA
Grand Village Indian Mounds	State of Mississippi	Natchez, MS
Champion Hill Civil War Battlefield	State of Mississippi	Raymond, MS
Assembly Hall	State of Mississippi	Washington, MS
Fort Dobbs State Historic Site	State of North Carolina	Statesville, NC
Wright Tavern in Rockingham	Run by the local government and Rockingham County Historical Society	Wentworth, NC
North West Co. Fur Post	private/ non-profit	Pine City, MN
Fort Loudoun State Historic Area	State of Tennessee	Vonore, TN
Fort Fredrick State Park	State of Maryland	Fredrick, MD
Martin House Restoration	Martin House Restoration Corporation (MHRC)/Non-profit	Buffalo, NY
Tryon Palace State Historic Site	State of North Carolina	New Burn, NC
Appomattox Court House National Historical Park	National Park Service	Appomattox, VA
Amherst Museum	Non-Profit	Amherst, NY

Breaking down the sites, there were six non-profit sites, eleven National Park sites, thirteen state run sites, one local government run site, one run jointly half state and half private non-profit (Wade House) and one run jointly half federal and half private non-profit (Jamestown and Preservation Virginia or APVA). In the interview process I talked

ATTACHMENT C

to twenty-eight men and seven women. Most had worked with the public on some level, if not at their current historical site then at another. The sites were spread throughout nineteen states including: four sites in North Carolina; three sites each in Mississippi, Virginia, and New York; two sites each in Maine, Maryland and Pennsylvania; and one each in West Virginia, Tennessee, Minnesota, Illinois, Michigan, New Jersey, Wisconsin, Iowa, Colorado, Texas and Massachusetts. Most of the sites are east of the Mississippi River.

The first question for the site employees was, “At your site you have reconstructed buildings. Please give some background on the site and why the park reconstructed the building/buildings.” The second survey question was, “Do you believe it was ethical to reconstruct this building or buildings?” When I started my research I looked at the ethics of reconstructing historical structures. But as time went on through the interview process, ethics, in the abstract, was not what I found. Rather it was how those individuals felt about the reconstruction of historical buildings. After the interviews were complete most site interviewees gave their personal opinion on reconstruction and not on the ethics aspect. On several occasions I was asked for a definition of ethics. Several questioned what ethics had to do with reconstruction, because standards are in place. I thought it was fair to respond: If a site does decide to reconstruct a historical building(s) I believe that if there is a plan (a method that the site follows), sufficient funds for the project and for maintenance, and the site abides by the DOI standards for reconstructing a historical building then the ethical standards for the field are being followed. Ethics are the basis of standards for a field of study and without them standards would not exist.

ATTACHMENT C

Out of the thirty-six individuals that answered the question, “is it ethical to reconstruct a historical building,” twenty-eight said yes, four said it depended on the circumstances and four said reconstruction was wrong, period. Ten other questions were asked, but for the sake of brevity most of the information will be taken from questions one and two.

This first section discusses the site interviews that had pro-reconstruction views. I will start with the reconstruction of the McLean House at Appomattox Court House National Historical Park (APCO). The Raine family bought the property in 1845 that sat toward the center of the town of Appomattox Court House and built a two story wooden tavern that was completed in 1846.⁵⁹ With the increase traffic on the Lynchburg-Richmond Stage Road the Raine family decided to build a guesthouse for additional space for guests. In 1848, the Raine Tavern Guesthouse (the future McLean House) was completed.⁶⁰ In 1854, the Southside railroad was build three miles to the west of the town diminishing stage traffic on the Lynchburg-Richmond Stage Road. By 1857 the Raines closed up the tavern and guesthouse and placed it on the market. Mr. Wilmer McLean bought the house in 1863 and he lived there with his wife and children. After the surrender in April of 1865, the McLeans lived in the house until 1867 when McLean defaulted on loans and the bank took the house. In 1891 M.E. Dunlap, of Niagara Falls, New York, bought the McLean House from the Ragland family, its owners then, with the

⁵⁹ In the early 1810s the Lynchburg-Richmond Stage Road was built through the area becoming the main road from Richmond, VA to Lynchburg, VA. The area became known as Clover Hill in 1819 when the Patteson family built the Clover Hill Tavern for travelers on the Lynchburg-Richmond Stage Road. In 1845 the State of Virginia created Appomattox County because the citizens in the area that would become Appomattox County had long distances to their county seats. Clover Hill was chosen for the county seat of the new county and soon after the name of the town was changed to Appomattox Court House. By 1860 around sixty buildings and around one hundred to one hundred twenty people lived in the town.

⁶⁰The Raine Tavern Guesthouse (McLean House) is a Federal/Greek revival brick three story, six room thirty-three hundred square foot building. Architect unknown.

42

ATTACHMENT C

intention of dismantling the house and taking it to Washington, D.C., to turn the house into a Civil War museum. In 1892, the Appomattox Land Company (Dunlap's company) dismantled the McLean House. The economic Panic of 1893 put the Appomattox Company out of business leaving the completely dismantled house to deteriorate for forty-seven years on its original site. In 1935, Congress officially made the site Appomattox Court House National Monument under the National Park Service (in 1954 changing the designation to be a National Historical Park). After purchasing the blue prints and photographs from the son of M.E. Dunlap, archeological research conducted in 1940-41, and finding historical photographs of the site, reconstruction of the McLean House started in 1947. The house was completed in 1949 and dedicated in 1950. Other buildings such as the McLean Well House, Icehouse, Kitchen, and Slave Quarters were reconstructed between 1950 to 1968.⁶¹

Today APCO does not have any plan for reconstructing the rest of the village. The park already has placed signs where buildings were located and in the future may create outlines where buildings once stood. But how do the current workers at the park feel about the reconstruction of historical buildings? Historian Patrick Schroeder, Curator Joe Williams, and Head of Maintenance John Spangler all offered their opinion on the subject of reconstructing historical buildings. Schroeder stated that reconstructions "undoubtedly" are ethical.⁶² Williams stated, "Very selectively, but yes, if the public good outweighs both the immediate and long-term cost, and the structure

⁶¹ Appomattox Court House National Historical Park, National Register of Historical Places Registration Form, United States Department of the Interior, National Park Service, May 19, 1989; *Appomattox Court House National Historical Park*. <http://www.nps.gov/apco/parkmgmt/index.htm>; *Historic Structures at Appomattox Court House*. <http://www.nps.gov/apco/historyculture/historic-structures-at-appomattox-court-house.htm>.

⁶² Patrick Schroeder, e-mail to author, 2/19/2009. Historian/Author Patrick Schroeder is currently working as historian at Appomattox Court House NHP.

43

ATTACHMENT C

was integral to important historic events. Education of future generations about important historical events. Is there a lesson that is important for society to remember - ie. peace and reunification, rising above differences?"⁶³ Spangler stated:

Ethics, what does that have to do with anything? The question should be what important role did the building/ buildings have in history, if any. If the building/ buildings played a significant role then yes, it's ethical. If the role was minimal, then how does it contribute to surrounding area, buildings, structures, ethnographic etc? If it's just an old building and you already have ten, then no. The answer is that there are so many variables that it's hard to give a straight answer without one looking at the complete situation of each building/ buildings in question. We as Americans view certain times in our history as important events that should be captured in time for perpetuity. And if a building is part of that event?⁶⁴

Michelle Zupan is Curator at Hickory Hill and the Tom Watson Birthplace, run by the Watson-Brown Foundation, a nonprofit Georgia corporation, located in Thomson, Georgia. The Watson-Brown Foundation operates three house museums: Hickory Hill, the Thomas E. Watson House and the Tom Watson Birth Place. Senator Thomas E. Watson (1865-1922) was a lawyer, elected to the Georgia House of Representatives, both U.S. House of Representatives and Senate, and writer. In 1900, he purchased Hickory Hill and passed it at his death to his two granddaughters.⁶⁵

In March 1, 2007, a tornado at Hickory Hill destroyed the Smoke House and Delco shed buildings and damaged the corn crib. Zupan stated that,

We have repaired the corncrib using as many original bricks and timbers as possible. The smokehouse was reconstructed with many of the original bricks, closely following the original lines and mortar composition. The

⁶³ Joe Williams, e-mail to author, 2/18/2009. Joe Williams is currently the Chief of Museum Services and Curator at Appomattox Court House NHP.

⁶⁴ John Spangler, email to author, 2/19/2009. John Spangler is currently the Chief of Maintenance and Facility Manager Appomattox Court House NHP.

⁶⁵ Michelle Zupan, email to author, February 2, 2009. Michelle Zupan is currently the Curator at Hickory Hill and the Tom Watson Birthplace.

ATTACHMENT C

Delco shed, a frame structure, has not yet been rebuilt as we are still researching its original location – we know it was moved at least once, possibly twice, in the last 60 years.⁶⁶

When answering the question of whether or not it is ethical to reconstruct, Zupan said “yes” because of the materials and information that were available.⁶⁷

The Dunker Church, located near Sharpsburg, Maryland, was built between 1852 and 1853 by the Dunkers, a sect of German Baptist Brethren, on the property of Samuel Mumma. During the Battle of Antietam, September 17, 1862, the building sustained heavy damage and was used as a hospital. After the battle the church was repaired and used as a church through the turn of the twentieth century. After the Dunkers moved their congregation to a new building, the building was left to deteriorate. In 1921, in its weakened state, the Dunker Church was destroyed by a wind storm. A building was subsequently built on the Dunker Church site and was used as a gas station and store. The store was taken down by the Washington County Historical Society 1951 and the property given to the NPS soon after. In 1961, the National Park Service reconstructed the building utilizing some of the original materials on the original site. The church was ready for the 100th anniversary of the Battle of Antietam/Sharpsburg in 1962.⁶⁸

Jane Custer, of Cultural Resource Division at Antietam National Battlefield, stated that the reconstruction was ethical because:

This structure is the only church within the area that is Antietam National Battlefield and the reconstruction was based on historic documentation therefore I do believe it was ethical. The documentary evidence and some

⁶⁶Michelle Zupan, email to author, February 2, 2009.

⁶⁷Ibid, email to author, February 2, 2009.

⁶⁸*The Dunker Church on the Antietam National Park Website.*
<http://www.nps.gov/anti/historyculture/dunkerchurch.htm>.

ATTACHMENT C

physical evidence permitted an accurate reconstruction with little conjecture. If there had been another church surviving within the battlefield, I don't think having this reconstruction would be as important. For example at Antietam National Battlefield we have eight different farms and each farm varies in the number of existing historic structures. Several have many historic outbuildings which were essential to farming in the 1860s, others do not, but because the effects of the battle on the local farm families can be told at one site, not all need to have outbuildings.⁶⁹

Dennis Frye, the Chief Historian at Harpers Ferry who worked at Antietam years before, explained that the Dunker Church was blown over in a hail storm. Frye related that when he was 13 years old, he volunteered at Antietam National Battlefield, giving tours at Dunker Church and telling the story of the reconstruction. "They were fascinated by the story of what happened to the building," stated Frye. Visitors "always wanted to know what was original in the church...They would connect with that instantly. The first thirteen floor boards in the church are original." Frye would see people go back and step on those boards. "Their soul was connected literally through the sole of their foot with the soul of history at that point."⁷⁰ Somewhere around 3,000 of the original bricks are within the walls of the reconstructed Dunker Church. Frye states, "...it's real history, because it's a real connection to the place and time." Frye believes that a reconstruction is the right thing to do in this situation, because even if there remains only a very small percentage of the original building, "the whole thing becomes real to them...think of how much more effective it is to have...those three thousand bricks part of the church rather

⁶⁹ Jane Custer email to author May 20, 2008; List of Classified Structures, Cultural Resources Division www.hscl.cr.nps.gov/insidenps/report.asp. Jane Custer is currently Chief of the Cultural Resource Division at Antietam National Park.

⁷⁰ Dennis Frye interview, April 8, 2008. 1:40-1:55. Dennis Frye is currently Chief of Interpretation at Harpers Ferry National Historical Park.

ATTACHMENT C

than two or three bricks on display in a museum case. Where no one can touch it...it has no context. Here is a brick from the Dunker Church.”⁷¹

Fort Halifax in Winslow, Maine, is one of the oldest blockhouses in the United States. The fort was built on the bank of the Kennebec River in 1754 to protect English settlers against attacks during the French and Indian War (1754-1763). The National Register of Historic Places Inventory states that original fort “ was square in shape” and had three palisade blockhouses set on the neighboring hill.⁷² After the war, the fort seemed to be abandoned despite its stout construction. By the time the Fort Halifax Chapter of the Daughters of the American Revolution (DAR) in 1924 got hold of the property, the only part of the fort left was one block house. After the restoration the DAR owned the property until 1965 when the group gave the property to the State of Maine’s Bureau of Parks and Recreation. In 1987, a flood destroyed what remained of the blockhouse. According to Tim Hall, regional director, Maine Department of

⁷¹ Fry interview, 6:05-7:16.

⁷² Fort Halifax Blockhouse, National Register of Historic Places Inventory - Nomination Form. <http://pdfhost.focus.nps.gov/docs/NHLS/Text/68000015.pdf>; National Register of Historic Places view on “Criteria Considerations : Ordinarily cemeteries, birthplaces, graves of historical figures, properties owned by religious or used for religious purposes, structures that have been moved from their locations, reconstructed historic buildings, properties primarily commemorative in nature, properties that have achieved significance within the past 50 year shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories: a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or b. A building or structure removed from its original location but which is primarily significant for architectural value, or which is the surviving structure most importantly associated with a historical person or event; or c. A birthplace or grave of historical figure of outstanding importance if there is no appropriate or building directly associated with his or her productive life; or d. A cemetery which derives its primary importance from grave of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or f. A property primarily commemorative in intent if design, age, tradition or symbolic value has invested it with its own exceptional significance; or g. A property achieving significance within the past 50 years if it is of exceptional importance, Frequently Asked Questions. <http://www.nationalregisterofhistoricplaces.com/faq.html>.

47

ATTACHMENT C

Conservation, “we went and chased timbers following the flood and we did not retrieve all the timbers. The decision was made to reconstruct the blockhouse using original timbers that we found and other timbers that were hewed to replace missing timbers.”⁷³

When I asked Hall how he felt about the reconstruction, he stated that it was “absolutely” ethical to reconstruct the blockhouse:

The blockhouse at Fort Halifax was on the town’s seal. It is an icon of that community. That community demanded that we rebuilt the blockhouse. So I mean it was under...intense public pressure...we reconstructed that blockhouse even though we knew that there was historical criticism about it and we faced the possibility of it [being] stricken from the National Register and it just had to be done.⁷⁴

Bent’s Old Fort, located in La Junta, Colorado, built between 1832 and 1834, by Charles Bent and Ceran St. Vrain. The fort was built to trade with Plains Indians and trappers. The adobe structure until 1849 was the only major permanent white settlement on the Santa Fe Trail between Missouri and the Mexican settlements. During the Mexican War (1846-1848) the site was used as a military hospital and a location to store military supplies. An explosion that partially burned it, sickness, and other reasons caused Bent’s Old Fort to be abandoned in the late 1840s. Between the late 1840s until 1920 the buildings of the fort were used for the Barlow-Sanderson and Express Company as a repair shop, cattle corrals, and materials were taken by local ranchers. The Daughters of the American Revolution took over 4.5 acres of the fort in 1920. In 1954, the Fort was taken over by the State of Colorado, and the National Park Service took it over on June 3, 1960, as a National Historical Site. The Park Service was responsible for

⁷³ Tim Hall interview, August 12, 2008, 7:15-7:38; *Fort Halifax on the Kennebec*, Department of Conservation, State of Maine Website. <http://www.maine.gov/doc/parks/history/forthalifax/index.htm>. Tim Hall is now retired, but at the time was Regional Manager for the Maine Bureau of Park and Recreation.

⁷⁴ Tim Hall interview, 8:59-9:30.

ATTACHMENT C

the research that eventually led to reconstructing the historical fort. Greg Holt, Park Ranger stated that Bent's Old Fort was reconstructed in 1976 to its original appearance by using "sketches, archeology and a journal. Local and regional ambition fueled its reconstruction,"⁷⁵ especially after the Park Service deemed the site "nationally significant."⁷⁶ Holt believes that the reconstruction was ethical "because there is good documentation and the building was of a very unique character and function."⁷⁷

San Antonio Mission, in San Antonio, Texas, did something every similar to Appomattox Court House and reconstructed only the most important building. In 1718 Franciscan missionaries and Spanish representatives arrived at the San Antonio River and established the first mission. By 1730, four missions (Mission Nuestra Señora de la Purisima Concepción de Acuña, Mission San José y San Miguel de Aguayo, Mission San Juan Capistrano, Mission San Francisco de la Espada were built in the area to Christianize the native population. In 1960, the National Park Service officially took over the site. Steve Whitesell, Superintendent at San Antonio Missions National Historical Park, states that San Antonio Mission:

Contains four 18th century Spanish Colonial missions and associated site features including irrigation systems, neophyte quarters, granaries, etc. Most of the four mission sites are preserved ruins. Mission San Jose, the largest of the four missions, was reconstructed in the 1930s by the Works Progress Administration. The buildings were reconstructed in order to show how a mission compound would have looked historically. I believe the decision to restore was likely made, consistent with thinking of the

⁷⁵ Greg Holt, email to author, February 19, 2008. Greg Holt is currently a Interpretative Park Ranger at Bent's Old Fort National Historical Site.

⁷⁶ Greg Holt email to author, February 9, 2008.

⁷⁷ Greg Holt email to author, February 9, 2008; Bent's Old Fort or Fort Williams, National Register of Historic Places Inventory-Nomination Form. http://www.nps.gov/history/history/online_books/beol/beol_nr.pdf; *Bent's Old Fort National Historic Site Website*. <http://www.nps.gov/beol/historyculture/index.htm>.

ATTACHMENT C

time, because visitors would have a hard time understanding the complexity of the site without a physical recreation.⁷⁸

Whitesell states that he feels that the reconstruction was ethical, but because the Mission was reconstructed in the 1930s “I don't believe it is possible for preservationists today to fully understand the thought process and conceptual framework that individuals were working through 70 years ago.”⁷⁹

At Jamestown on May 13, 1607, one hundred four men and boys arrived from England. Soon after these travelers built a fort for protection against the local Indians and named it after King James I of England. Eventually the colony grew, the capital moved to Williamsburg, and, over time, the fort disappeared. For a long time many people believed that the fort had been swept into the James River over the years. But recently the Preservation Virginia (APVA) archeology discovered that the fort site is still mostly above water; the old interpretation of the site's location was incorrect. William Kelso, Director of Research and Interpretation for APVA, at the Jamestown site, explains that:

Archaeologists reconstructed a mud and stud frame in 2006 based on archaeological postholes and research in England. Reason: experimental archaeology and to give visitors some scale to the site of 1607 James Fort the remnants of which are basically only holes in the ground. We stopped at only a frame because of future maintenance problems. It's a split site half National Park Service and half state of Virginia.⁸⁰

⁷⁸ Steve Whitesell email to author, March 10, 2008; Steve Whitesell at the time was Superintendent at San Antonio Missions National Historical Park, but now is Associate Director, Park Planning, Facilities & Lands in the NPS Washington Office.

⁷⁹ Steve Whitesell email to author, March 10, 2008; *Mission San Jose y San Miguel de Aguayo*, San Antonio Missions National Historical Park Website.
<http://www.nps.gov/saan/historyculture/sanjosehistory1.htm>.

⁸⁰ William Kelso email to author, July 31, 2008; William Kelso is currently the Director of Research and Interpretation in Archaeology at Jamestown.

ATTACHMENT C

Kelso does believe that the reconstruction of the fort and the 1907 reconstructed church to be ethical.⁸¹

Herbert Hoover, the thirty-first President of the United States, was born in 1874 in a two-room home in West Branch, Iowa. His family, especially his father, a local blacksmith, helped start the community. Several years after Hoover was born his father sold the blacksmith shop; it was later moved to another part of West Branch, and was subsequently torn down in the 1890's. According to Cary Wiesner, Historian at Herbert Hoover National Historical Site,

The blacksmith shop was first proposed in a 1948 Master Plan prepared for the Herbert Hoover Birthplace Society, which at that time managed the park. It was given a low priority at the time. In 1954 Herbert Hoover's son Alan informed the society that the Hoover family was against building a reconstruction blacksmith shop since there was 'no authentic print or plan in existence.' In early 1955 former President Hoover withdrew his opposition to the proposal to build a blacksmith shop, provided 'there was no attempt to at an original restoration since everyone seems to have forgotten it, but merely a sample of what a typical one of that vintage used to be.' Construction was completed in 1957. At that time a sign 'Jesse Hoover Blacksmith' was placed on the front façade, even though the shop was not intended to be a replica of Jesse's shop. (Apparently the Hoovers did not object).⁸²

To add to this Neil Korsmo, Chief Ranger at the site, stated that the reason it was important for the reconstruction was that "the blacksmith shop was reconstructed by the Hoover family when the site was still privately held because Herbert Hoover's father was a blacksmith, and lessons learned by Herbert at his father's blacksmith shop guided him his whole life. The symbolism was important to the Hoover family. Numerous other

⁸¹ William Kelso email to author, July 31, 2008.

⁸² Cary Wiesner email to author, February 20, 2008. Cary Wiesner is currently the Historian at Herbert Hoover National Historic Site.

ATTACHMENT C

buildings were moved onto the site to help with interpretation of the site.”⁸³ Both felt that the reconstruction was ethical. Wiesner wrote, “yes, except for the sign, since the idea was to show a typical blacksmith shop rather than specifically Hoover’s father’s, and since blacksmith shop buildings were generally vernacular and did not seem to follow a standard size or floor plan.”⁸⁴ Korsmo wrote that the historical reconstruction helps “to provide the interpretive site [the ability] to discuss thoughts, ideas, and values. Also to give people a chance to see a side of life that was very important at the time, but is essentially lost now.”⁸⁵

Fort King George, along the Altamaha River, in what is now Darien, Georgia, was built in 1721 by colonists from South Carolina to guard against Spanish attack. Six years later they abandoned the fort. Ten years later the town of Darien was created on the site under the eyes of General James Oglethorpe and a group of Highland Scots, and soon the fort was forgotten. According to Steve Smith, Fort King George’s Site Manager, Betsy Lewis began researching the site in the 1920s and 1930s, eventually becoming the fort’s historian. Lewis “started her own research about Fort King George and, through using archives, descriptions, period maps, she was able to pinpoint exactly where the fort originally was...”⁸⁶ Eventually she would influence the state of Georgia to buy the site and have archeology conducted on it. The site lacked buildings for many years.

⁸³ Neil Korsmo email to author, February 2, 2008. Neil Korsmo is retire but at the time was Chief Ranger at Herbert Hoover National Historic Site.

⁸⁴ Cary Wiesner email to author, February 20, 2008.

⁸⁵ Neil Korsmo email to author, February 2, 2008; The Reconstruction of the Blacksmith Shop, Construction, Maintenance & Landscaping, 1939-1970, The Hoover Houses and Community Structures: Historic Structures Report. http://www.cr.nps.gov/history/online_books/heho/hsr/chap1h.htm.

⁸⁶ Steve Smith Interview, June 3, 2008, 4:30-4:45. Steve Smith is currently Site Manager at Fort King George Historic Site a Georgia state site.

According to Smith, “visitation was very poor and not a lot of people were exposed to the fort” then:

in 1986... the Lower Albemarle Historical Society approached the manager at that time his name was Ken Akin. And they talked about raising money to reconstruct not the entire fort, but just the block house which was the main structure of the fort...throughout 1986-1987, the historical society became heavily involved in raising money to build the blockhouse and the agreement was whatever they raised the state would match...they were able to raise something in the neighborhood about \$50,000 to \$80,000. The state matched and they were able to construct the blockhouse. And that was 1988...And from 1988 on up to 1994 visitation to the site remarkable increased. And it's something we've documented and in this case demonstrated to a lot of people that you know resources development of more cultural resources at a site obviously attracts more people. Since the site was making more money exponentially as a result of the blockhouse. School visitation increased. Around 1998-1999, Senator Kemp was our state Senator, he got really interested in raising money or petitioning the state legislature to give money to finish out the construction of the fort. ..the soldier's barracks, the officers barracks, and the guard house...Kemp was successfully able to get the state legislature to give us [money] for those structures. The soldier's barracks were built in 2000. The officer's barracks and guard house were both completed in 2002...the fort is now 100% complete.⁸⁷

The reconstruction was done with sketches and blueprints that were drawn by Colonel John Barnwell.⁸⁸ When asked how Smith felt on the ethical point of reconstructing a historical building, he stated that,

I've gotten into debates with a couple of people who work in our division. Historical sites who feel that way it's unethical. You can't prove that you know the fort was built out of exactly those specific materials and should not build it at all. I got into an argument with a re-enactor one time who tried to argue we shouldn't have our [uniforms] displayed out there

⁸⁷ Steve Smith Interview, June 3, 2008, 6:00-11:30.

⁸⁸ Colonial John Barnwell (1671-1724) born in Ireland who came to the Colony of South Carolina in the late 1690s-1700. He helped build the outpost on Fort King George on the Altamaha River and work on Indian affairs with the Yamasee.

ATTACHMENT C

because it's not one hundred percent accurate. So my attitude is if you don't put it in the public eye then there's no avenue...to explore the past. They have no... resource to...engage them in the past and makes them want to understand it better...by taking the fort away...so many people who aren't going to come here to ask the question why is this here? And what's this time period like?...And it also intrigues people and makes people want to learn more. Makes people want to come and see it. And again I think a lot of people who find that unethical are people who just ... I think they find it unethical for a lot of personal reasons rather than professional reasons.⁸⁹

The Wade House located in the town of Greenbush, Wisconsin, was created in the mid-1840s before the state came into the Union in 1848. It was a town on a stage road with several stores, a school, blacksmith shop and a sawmill. The Herrling sawmill, operated by Theodore Herrling, was an important part of this community. When the railroad was built away from the town in 1860s, the town, like Appomattox Court House, started to decline. Soon only a few people lived in the town, and buildings started disappearing into history. David Simmons, Site Director at Wade House, said that the desire to reconstruct the sawmill dates back over fifty years. The ruin of the dam was all that was left when Marie and Ruth Kohler, of the Kohler Foundation, decided to restore the Wade Home as it was in the 1850s. The Kohlers' dream of reconstructing the sawmill did not happen until the 1980s. With information from photographs, documents, and the archeology, Simmons stated:

All those things combined with some considerable outside funding to reconstruct the mill very similar to the one that existed here...A sawmill an up and down saw mill at this...location on the Mullet River was a critical component to the development of this little hamlet of Greenbush. And it's very closely allied and tied to the choice of this site for the settlement by the Wade family. And they were the first settlers here and they chose a site where there was a good head...of water so he

⁸⁹ Steve Smith Interview June 3, 2008, 12:30-15:29.

ATTACHMENT C

could...have a sawmill. So far for...those reasons...I think it makes good sense to go on and have the reconstruction [done].⁹⁰

When it came down to how Simmons felt about reconstructions he stated, "yea."

⁹¹

Fort Loudoun was built during the French and Indian War (1754-1763) to protect western South Carolina from threats in the Mississippi River and protect trade routes between the Cherokee Nation and South Carolina. Four years later, after relations between the Cherokee and South Carolina broke down, the Cherokee captured the fort and, after the British left, destroyed it. The site was never used again for military purposes. According to Jeff Wells, Park Manager of Fort Loudoun State Historic Site, in:

...1933 when the site was set aside by the state of Tennessee as a historic area and initially of course there were archeological remains there were archeological excavations that took place at the site under the WPA New Deal organization that worked here in East Tennessee. The site was operated all those years by the Fort Loudon Association which was a group of private citizens that organized themselves to run the site on behalf of the state of Tennessee. All along their goal was to reconstruct the fort. Fort Loudon Association ran the site for forty years and during that time period did reconstruct the palisades, the outer line of wooden wall...and the powder magazine I believe. But for forty years they were never able to do any more than that. Now I had mentioned the location of the fort being alongside a river. In the 1960s, the Tennessee Valley Authority proposed a dam on the Little Tennessee River. Tellico Dam. Because of its rather odd hillside location the lower portion of the fort would be inundated by the waters of Tellico Lake because after this free flowing mountain stream is backed up it creates a lake and the fort was going to be or half of the fort was going to be flooded underwater...So with that understood there was actually a third round of archeology, there was a second round of archeology that I failed to mention in the late 1950s... And also along that time same time period in the 1960s Fort Loudoun was placed on the National Register of Historical Places. So there was some measure of protection if you will but that did not really per sway the Tennessee Valley Authority from going on and finishing this dam... Well as I stated the lower portion of the fort would be underwater

⁹⁰ David Simmons, Wade House Interview, 8:15-9:30. David Simmons is currently the Site Director at Wade House one of the Wisconsin Historic Sites.

⁹¹ David Simmons, Wade House Interview, 10:00-10:05.

ATTACHMENT C

so there this great debate how do we save the fort?... the Tennessee Valley Authority created a backfill lack of a better word over the archeological remains at a depth of seventeen feet. So where we trod now by latitude and longitude the correct location of the fort but by elevation its seventeen feet above sea level higher than it was...“When the decision was finalized that the lake would come in and the site would have to be elevated the Tennessee Valley Authority a federal agency said well we will come back then and restore it to the visually state that it was in. So now were built the site up by seventeen feet the Tennessee Valley Authority comes back in rebuilds the fort palisades, all be it seventeen feet higher and the powder magazine...and built a museum as well a visitor center. And then that was the state of the site when Tennessee State Parks took over in the late 1970s.⁹²

Asked for his feeling about the reconstruction of these building, he stated “yes.” Wells went on to say that when “I talk to visitors I make it very clear that it’s a reconstruction.”⁹³ The site managers stated that a certain number of buildings could be reconstructed after the Tennessee Valley Authority did their share. All the research had been done on the buildings that would be reconstructed prior to the back fill. Wells states that living history and education are important uses for the reconstructed buildings.⁹⁴

In 1804, a fur trader and some of his workers of the North West Trading Company started the journey from Fort Saint Louis, now modern day Superior, Wisconsin, all the way to what is now just a few miles past what is now Pine City, Minnesota. At this location the fur traders built several houses, store houses and a shop to be able to trade all fall and winter. The traders went up and down the Snake River and traded furs with the Ojibwa, the local Indians. After spending eight months in this area the traders went back to Fort St. Louis never to return to the site again. A short time later the site burned. In the 1960s, archeologists excavated the site and the Minnesota Historical Society opened the location as a historical site. According to Patrick

⁹² Jeff Wells Interview March 18, 2008, 3:23-8:32. Jeff Wells is currently Park Manager at Fort Loudoun.

⁹³ Jeff Wells Interview March 18, 2008, 10:20-11:00.

⁹⁴ Jeff Wells Interview March 18, 2008, 10:20-11:00.

ATTACHMENT C

Schifferdecker, Site Manager, North West Co. Fur Post, the information to reconstruct the buildings came from the “archeology, there was a journal kept by the trader here, also there are some contemporary water colors of other posts, not of this particular post and there is pictorial and archival research as well as the archeology.” When asked how Schifferdecker felt about the reconstruction of the trading village, “anyone who does history...you write a book you’re reconstructing history based on the documentation...Those people who argue against reconstruction probably should argue against doing any history at all.”⁹⁵

Built in 1816 by James Wright, the Wright Tavern was constructed in Rockingham County’s seat, Wentworth, NC. For close to one hundred years the Wright and Reid families ran the tavern that had grown from one building to around twenty main or support buildings. By the time the Rockingham Historical Society took over the property in 1967, all but the main building had collapsed over time. Even the back part of the tavern had fallen down. According to Kitty Williams, Wright Tavern maintenance, Rockingham County Historical Society at Wright Tavern, “The first thing they [Rockingham Historical Society] did was to rebuild the L [back of the building]. And it looks basically like it did now except that they left out a set of stairs that went into the attic from the L.” Several nineteenth century buildings such as the corn crib and a smokehouse have been moved onto the property.⁹⁶ Williams stated pro or “yes” for

⁹⁵ Patrick Schifferdecker Interview July 2, 2008. 2:15-7:55. Patrick Schifferdecker is currently the Site Manger at North West Co. Fur Post part of the Minnesota Historical Society.

⁹⁶ Kitty Williams Interview March 11, 2008, 11:13-19:10. Kitty Williams is currently working at Wright Tavern Maintenance part of the Rockingham County Historical Society in NC.

rebuilding historical structures. She also had a very strong opinion in favor of historical landscaping and the importance of it to a historical site.⁹⁷

Section two is about those who responded that it depends on the situation when it comes down to reconstructing historical buildings. Fort Stanwix, in what is now Rome, NY, was built by the British in 1758 to defend against French invasion during the French and Indian war. In 1774 the British abandoned the fort and left it to rot. During the American Revolution the Americans repaired and renamed the fort, Ft. Schuyler. After a flood and a fire destroyed that fort in 1781, nothing was done with the site until 1794 when a block house was built there. By 1815 the site was in disrepair and not in use. The City of Rome, New York, began to build over the site and in time it was forgotten. In 1935, President Franklin D. Roosevelt signed the Wagner-Sisson Bill to create Fort Stanwix National Monument. In the 1960s in order to augment an urban renewal project, the city donated the land officially to the National Park Service. According to Mike Kusch, Fort Stanwix National Monument, Chief of Interpretation and Resource Management,

Yes, all of the buildings are reconstructed... Beginning in the early 1960s Rome's economy began to deteriorate. Heavy industries such as the steel, copper, iron and wire mills started to move away (rust belt era). Then the local Griffiss Air Force Base was realigned as technology changed. Support industries then moved as well. This realignment and relocation of support industries further dragged the local economy down. In an attempt to bring some industry/business back to Rome, local leaders decided to invest in heritage tourism. These leaders, not the community as a whole, approached the NPS about what could be done with the fort. Fort Stanwix National Monument was authorized in 1935, however it could not be reconstructed unless the land was donated to the NPS or the money to purchase the land was donated. The NPS deflected this request by

⁹⁷ Kitty Williams Interview March 11, 2008, 19:13-19:47, 38:00-38:55.

ATTACHMENT C

referring to its policy of not reconstructing historic sites. These leaders then engaged the local House representative and its new Senator, Robert Kennedy, who was in the process of ramping up his presidential election and needed to garner votes in upstate New York because he elected by a narrow margin... By this point downtown Rome was depressed. There were vacant buildings and empty business fronts. The NPS conducted a study to explore various alternatives. The first was no action and provided only a modicum of support to the local historical society, the Fort Stanwix Museum which later became the Rome Historical Society. If remains of the fort existed, they were located behind the museum's building. The second alternative was to reconstruct a bastion of the fort, the flag bastion in particular, behind the museum and to provide a great NPS presence... The last alternative, and the one the NPS least wanted was to rebuild the fort. The local community leaders lobbied for this third alternative, and willingly destroyed their downtown during an urban renewal project and donated the land to the NPS. After the alternative selection a limited archeological investigation was conducted in the backyards of buildings and an astonishing amount of evidence of the fort was found. As the buildings were demolished, NPS archeologists investigated about 1/3 of the site and were able to confirm the dimensions of the fort as documented in 18th century architectural drawings and found significant evidence of the fort and its occupants, as well as a information about the people and structures through the late 18th to mid 20th centuries, notably, what I call, the canal era. The site was then cleared, with archeologists monitoring the work, and the fort reconstructed on its original foundation. The archeology and the first phase of reconstruction taking six years to complete. The fort was opened to the public for the nation's bicentennial. A second phase of construction took place in 1978. The third, and final phase was never completed. What visitors currently visit is a partially reconstructed fort, designed for living history demonstrations (along the lines of the Colonial Williamsburg model). The missing structures include the ravelin, guard house, headquarters, necessary, and communication (sally port).⁹⁸

When asked if he thought it was ethical that historical buildings be reconstructed, his response was:

Depends. It depends on the sum of all the factors in making the decision. I, for one am not opposed to reconstructions because I see the value to interpretation and education. However, it must be done right and smartly.

⁹⁸ Mike Kusch, email to author, February 18, 2008.

ATTACHMENT C

If the reconstruction threatens an adjacent historic structure, then no. If the reconstruction is done in a different location, no. If the reconstruction displaces people and business vital to the community's well being, no. &c. In Rome's case, the buildings in the worst condition were located on the site of Fort Stanwix.⁹⁹

The Cahokia Courthouse was originally built about 1740 when the Illinois country was part of New France. In the early 1790s, when American settlers began to occupy the territory they changed the building from a home into a U.S. territorial Court House. When the county seat moved from Cahokia Court House, the Courthouse building was used as a city hall, school, saloon, and it was used to store farm machinery. In the early 1900s the building was purchased, dismantled and sent to St. Louis for the World's Fair in 1904. Molly McKenzie, Site Manager, Cahokia Courthouse State Historic Site Complex, in Cahokia, IL, stated that she believed the owner wanted to open a "beer concession. He was not given a permit to sell beer, so he opened it as an attraction where he talked about old timey ways of law and order."¹⁰⁰ After the fair closed in 1906 the Chicago Historical Society bought the property and sent it to Chicago. Though not destroyed, it was rehabilitated to be used as a Japanese tea room and other establishments until the Chicago Park Board took over. In the mid-1920s the town began to ask Chicago to give its building back. Eventually the state of Illinois gave the town back its old courthouse. According to McKenzie:

They [the town of Cahokia] first engaged the state museum in an archeological project to determine the original foundation location, shore those up in order to reassembling the building on its original foundation. That was the first paid professional archeological excavation in the state of Illinois. And the foundation had been left on the ground when it was first moved in 1901. So they brought the timbers back from Chicago, replaced where necessary, reassembled with the stone that was left on the site. Of

⁹⁹ Mike Kusch, email to author, February 18, 2008.

¹⁰⁰ Mike Kusch, email to author, February 18, 2008.

ATTACHMENT C

course features like the roof had to be completely new materials and the interior was also reproduced in a like fashion. There were, they spent a lot of time researching and taking [information] from oral informants who were residents of the village who remember the building, who had lived in the building and so on. So they had a lot of oral informants on how the building appeared on the interior. Photographs of it from the 1890s that they used in the reassembly so they really were committed to doing the most accurate job possible on the building. And it was dedicated in 1940 to the splendid heritage of the citizens of Illinois.¹⁰¹

McKenzie goes on to say that her view on reconstructing of historical buildings depends on the time period and depends on the site.¹⁰²

Ocmulgee National Monument, located in Macon, Georgia has a vast history of close to 9,000 years. Between 900 and 1200 AD, the Mississippians occupied the site. This group, called Macon Plateau, created seven mounds and sometime around 1000 AD there was an earth lodge that was the political, social, and spiritual center for the group. Over time the Mississippian culture disappeared as did the Earthen Lodge. In the early 1930s, when the town of Macon was using one of the mounds for fill dirt, several archaeologists asked the Smithsonian Institution to conduct extensive archeology in the Macon Plateau area. In 1936, after it became the largest archeological dig in the country up to that point, President Roosevelt created Ocmulgee National Park. One of the most important finds during the major archeological digs was a thousand year old lodge floor. According to Jim David, Superintendent of Ocmulgee National Monument:

We call that the Earth Lodge. And once again when they were doing archeological work here in the 1930s, they discovered this original one thousand year old floor that was very clear to be a meeting facility. They found a circular building circular floor with all these seats on it a bird shaped effigy located where the fire pit was and so forth and the floor was in amazingly good condition when the archeologist found it. And there

¹⁰¹ Molly McKenzie Interview, April 15, 2008 9:30-10:24. Molly McKenzie is currently Site Manager, Cahokia Courthouse State Historic Site Complex, II.

¹⁰² Molly McKenzie Interview, April 15, 2008 4:11-10:24.

61

ATTACHMENT C

for at that point through studying the logs and so forth that were laying down on top of the floor they were able to come up with a fairly good assumption...pretty good idea of the roof structure and very clearly also find out see were the entrance into the room and so forth were and so therefore ...[Ocmulgee NM] decided to try to portray what the interior of this structure look like. And all things I've read from the Archeology so forth I think they came up with a fairly fatefully portrayed of what the interior looked like. Because it was very evident were the four posts for the ceiling...and they were able to find enough evidence to figure out what type of weaving mat made up the sides of the entrance way and covered part of the roof structure. Now...from the exterior is probably very questionable. Back at that time they basically built a concrete structure over the original floor. Once again making the interior over top of the floor as accurate as they possible do. And decided to cover the whole thing in dirt. Now from...a plan structure report done on the Earth Lodge and the author of that said that most likely instead of a complete mound of earth like it is portrayed it probably had probably had the open sides that formed the walls but then it was probably a thatched roof that covered the structure not all earth like its portrayed now. Oh course we are aware that it did have to have a vent hole for the fireplace. Course there was no way to recreate that and still protect the original floor. For this case the interior, I always tell that to visitors that the interior is very faithful what they are seeing from the exterior is reconstructed. But there was really no I don't know of any good way they could have come up with to portray or still be able to show the original floor ...it can tell visitors that it is a unique one of a kind resource. That a number of mound sites that date back to the same period of the Mississippian age we are not the biggest or anything else, but of all the other Mississippian mound sites the other ones did find...lodges, but in no other case were the floors in such good condition that they were worth displaying. And with this one being basically intact this is the only place in the world that one can see that earth lodge floor with some type of earth lodge structure over top of it that would have not been possible.¹⁰³

David's view of the reconstruction of the earth lodge and other historical sites seems to be a situational position.

I've worked at other parks that have reconstructions and its always highly debated as your thesis have been talking about. Now ...in this case with the earth lodge I don't think there was any other option. I think putting a modern building over the top would have made it look very funny. I think trying to do as faithful a reproduction as they could and still to be able to

¹⁰³ Jim David Interview March 19, 2008 1:04-6:13. Jim David is currently Superintendent at Ocmulgee National Monument.

ATTACHMENT C

preserve the floor I think this method worked out the best. Once again...I think the archeologists were able to come up at least with the at least the interior how the roof situated I think they were able make it I believe pretty accurate from everything I've read and what there justification was. Now generally speaking I probably agree with the ...Park Service policy is that generally speaking if you don't have photographs or drawings I don't think that reconstructions normally be done. You can do a faithful reproduction then I have always been in favor of them and once again this one [earth lodge] I say once again its borderline, but in order for people be able to see this floor there was no other option.¹⁰⁴

Fort Fredrick was built in 1756 to protect the western frontier of the Colony of Maryland from Indian attack. This stone structure held civilians during the French and Indian war and Pontiac's War of 1763, held British and German prisoners of the American Revolution and was garrisoned during the American Civil War. The fort, however, was never attacked or fired upon by the enemy. In 1922, the State of Maryland took over the fort and the wall surrounding it. In the 1930s the Civilian Conservation Corps (CCC) did work on the walls and the support buildings outside the fort walls. These support buildings were not historical buildings or based on any buildings. The barracks within the fort were reconstructed by the state in the 1970s. With archeology and extensive work on researching the site, Fort Fredrick now has the original layout and other information from the men who served in the fort over the years. Archeology in 1999 and 2000 suggested that the CCC destroyed a lot of the evidence of the past including taking a significant amount of artifacts as well. Ross Kimmel, Maryland State Historian, while interviewing at Fort Fredrick, discussed the history of the site, what the CCC did to the site and how the site intends to reconstruct in the future. To let the public know what was original wall and reconstructed by the CCC Kimmel stated that "...we purposely kept what is original of the wall with the whiter mortar and the darker

¹⁰⁴ Jim David Interview March 19, 2008 7:11-8:54.

ATTACHMENT C

mortar what CCC used Portland Cement”¹⁰⁵ When asked how he felt about rebuilding historical buildings, Kimmel stated, “So the question is why are we spending money reconstructing buildings that have been gone for two centuries when there are standing structures that are begging. And the answer is no body makes that connection and it’s all very political.”¹⁰⁶ In other words it just depends on the situation.

...years ago when as a young college kid I first started coming up here we got all excited about seeing the fort restoration continued from what the CCC did and the bicentennial seemed a natural reason to do it. So our group was lobbying heavily. I remember an older woman, she was some kind of a travel writer in Maryland I forget her name and she said to me one day up there on the earth filled basher on the catwalk now don’t you think there is some merit to just leaving this as a ruin instead of imposing all this modern construction on it which it really not genuine or authentic? I thought my god what is she...that is a really stupid idea I did not say this to her ...of course this should be reconstructed. Me and my friends have a great playground to play in...I think that’s what gets behind a lot of restoration is local people get an interest in convince government to restore the place of course it’s for an educational purpose... If the CCC had left the place untouched I would say there is an argument for preserving it as a ruin, but the fact of the matter is the CCC had come in the 1930s and did their reconstruction actually probably did a pretty good job all things considered and at least had the sense not to try and reconstruct barracks. They did not know enough about them.¹⁰⁷

The third and final section looks at the surveyed workers who are anti-reconstruction. Pennsbury Manor in Morrisville, Pennsylvania, was built by William Penn from 1683-1686. Penn only lived in the house until from 1699 to 1701, when he returned to England with his second wife, Hannah Callowhill, their son John, and Letitia, a child from his first wife. Penn’s heirs sold the estate in the 1700s and the house fell into ruin. In 1932 the Charles Warner Company donated ten acres of the original site to the commonwealth of Pennsylvania. For the next nine years the Pennsylvania Historical

¹⁰⁵ Ross Kimmel Interview May 21, 2008. Maryland State Historian.

¹⁰⁶ Ross Kimmel Interview May 21, 2008 1:33:07-1:33:22.

¹⁰⁷ Ross Kimmel Interview May 21, 2008 2:15:50-2:17:20.

ATTACHMENT C

Commission reconstructed the manor. The group followed archeology and Penn's original instructions for the building of the home. Lara Murphy works as an Interpretative Researcher at Pennsbury Manor. Murphy stated about the reconstruction "It was a controversial topic in the 1930's. From a scholarly point of view, the site should not have been reconstructed."¹⁰⁸

Valley Forge National Historical Park, is the location of the Continental Army's Winter Encampment in 1777-1778, under the command of General George Washington. "He issued an order for the approx. 12,000 troops to erect huts (log cabins) to protect them from the elements and low temperatures. Within ten years after the encampment, no evidence of the log structure of hundreds of huts remained."¹⁰⁹ Timothy Preston Long, Historical Architect for the site, states that the reason he is not in favor of reconstruction is "It runs counter to the Secretary of Interior's Standards to construct a new feature when no pictorial or physical evidence exists. It is creating a false historical appearance."¹¹⁰

The State of Mississippi's historical sites are run by the Mississippi Department of Archives and History. The state runs historic sites at fifteen properties and most of the properties are not open to the public. They range from archeological sites to Civil War battlefields. Jim Barnett, Mississippi Department of Archives and History's director, talked about the 27 years that he had been with the department. Only twice did the thought of reconstructing historical buildings come up, he said:

¹⁰⁸ Lara Murphy, email to author, February 18, 2008. *Pennsbury Manor Website*. <http://www.pennsburymanor.org/Guide.html>. Lara Murphy at the time of the interview was the Head of Interpretive Research at Pennsbury Manor.

¹⁰⁹ Timothy Preston Long, email to author, February 10, 2008. Timothy Preston Long at the time of the interview was the Historical Architect at Valley Forge National Historical Park. *Valley Forge National Historical Park Website*. <http://www.nps.gov/vafo/historyculture/index.htm>.

¹¹⁰ Timothy Preston Long, email to author, February 10, 2008.

ATTACHMENT C

A building called Assembly Hall at Washington, Mississippi which is where historic Jefferson College is... We were set to acquire this 1811 building and it burned... And so we went ahead and purchased just the property as an archeological site we have not... never seriously discussed the doing the reconstruction... we discussed it a couple of times... but I don't think anybody really wants to do this. I don't think our board of trustees has ever formally adopted a policy on reconstructions. We are involved right now in what is a reconstruction of a civil war period building. .. We've had some long discussions about reconstruction pros and cons and the project we're involved with now is a building called the Coker House on the Champion Hill battlefield in Hinds County, Mississippi. And the Coker House was previously owned by a private Civil War group and they just could not manage the upkeep and restoration of the house it deteriorated quickly. In 2000, they donated or deeded the property to the Department of Archives and History and we received a grant about that same time from the federal highway transportation a transportation enhancement grant to develop historic properties that were part of the Vicksburg Campaign trail and the Coker House is part of that. So money was set aside at the point to restore the Coker House. We finally got to the point now where we have begun this process. The only problem is that the Coker House was so far deteriorated that essentially we have dismantled the house and in fact now it is now completely dismantled and the useable parts of it are in storage... and we do have a plan although no funding in place yet, but a plan to rebuild this house with as much of original material as possible... I am going to guess that once this is all done maybe less than twenty-five percent of the structure will be original.. material and we have argued and its been difficult to come to an agreement on this project because it is actually a reconstruction. Even though you can stretch the restoration term to possibly include this it really is a reconstruction.¹¹¹

The building will be going on the original foundation. When asked about how he felt on the matter of reconstructing historical buildings, he stated "Personally I do not [believe in reconstructing historical buildings]... My feeling is there are so many buildings standing in need of being saved that I feel that we're better off focusing on them. The Coker House has been an interesting situation, because the funding that we have to do this work is focused on the Vicksburg Campaign Trail and there are only at least on public property

¹¹¹ Jim Barnett Interview March 19, 2008. 0.00-9:45. Jim Barnett at the time of the interview was the Director of Mississippi Department of Archives and History.

ATTACHMENT C

two remaining structures that are not in Vicksburg on battlefields that relate to that campaign.”¹¹² That’s why he believes money has been put toward Coker House.

Though a small survey from sites across the country, the data received from this study gives an idea about what site workers feel about reconstructing historical structures. Those who are pro-reconstruction stated the following reasons for their views. First, education for all ages, teaching about the history of the site, using the reconstructed building for living history and the tangibles of how a building looks, feels and smells. Second, having a historical building to see when visiting a site. Third, reconstruction preserves heritage for future generations. Fourth, as the only structure of its kind at a location or area with historic structures.

Some of the individuals interviewed who worked at historic sites qualify their support by arguing that reconstruction must be on a case-by-case basis. As one person stated, “it depends on the situation when it comes down to reconstructing historical buildings.” Others noted, as opponents of reconstruction had warned, that political and social pressures from local constituents were the reason for the reconstruction at some sites. One said that “they did not have a choice, but to reconstruct over a site.”

A few site workers opposed reconstructing historical buildings, and they had several reasons for that opposition. First, the fear of the historical site falsifying history or how the building would appear to the public. Second, to protect an archeological site from destruction. Third, to put the money toward an historical building rather than

¹¹² Jim Barnett Interview March 19, 2008. 9:45-11:06.

67

ATTACHMENT C

toward a reconstruction. Fourth, some say, incorrectly, that reconstruction violates the Department of the Interior Standards for the preservation of historical buildings.

Again these are just a few views from site workers in the field. Most are interested in educating the public. A site reconstructing a historical building can educate the public on historical architecture of that time period, how historical buildings are built, and how people lived in a certain area at a certain time period, these workers share this view.

61

Illustrations of the Historic Site



Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. May 5, 1975, east barracks under reconstruction, showing modern construction methods used in places that would not show in the final product.



Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. July 25, 1975, west barracks under reconstruction, showing modern construction methods used in places that would not show in the final product.

ATTACHMENT C

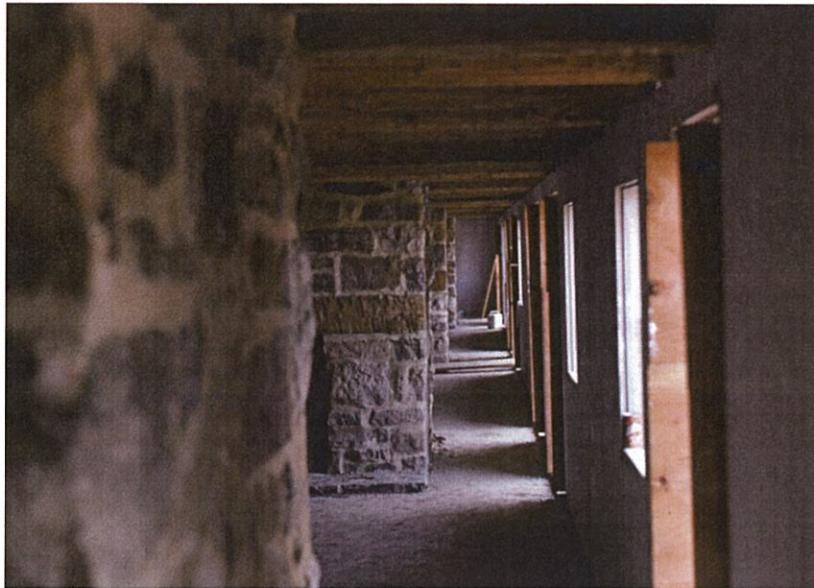


Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. September 11, 1975, west barracks under reconstruction.

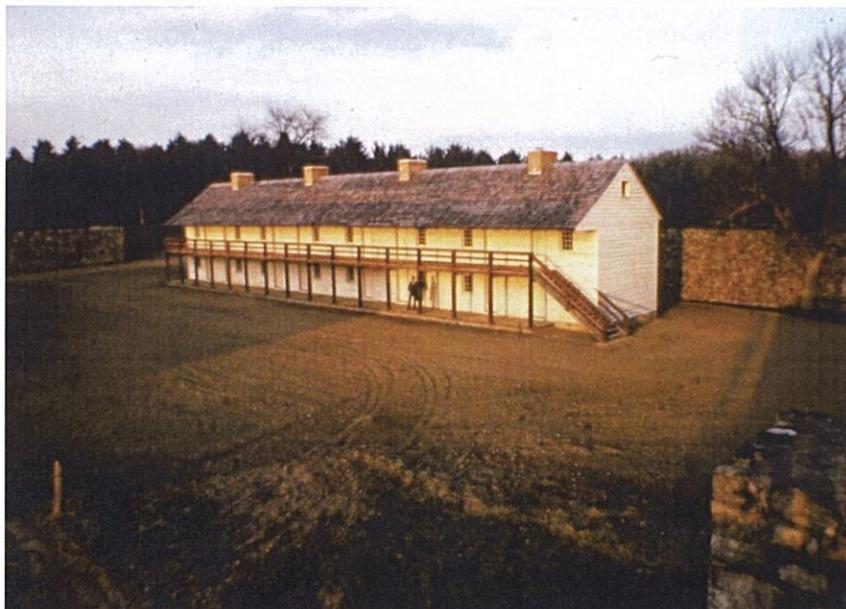


Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. August 11, 1975, east barracks under reconstruction, showing modern construction methods that would not show in the final product.

ATTACHMENT C



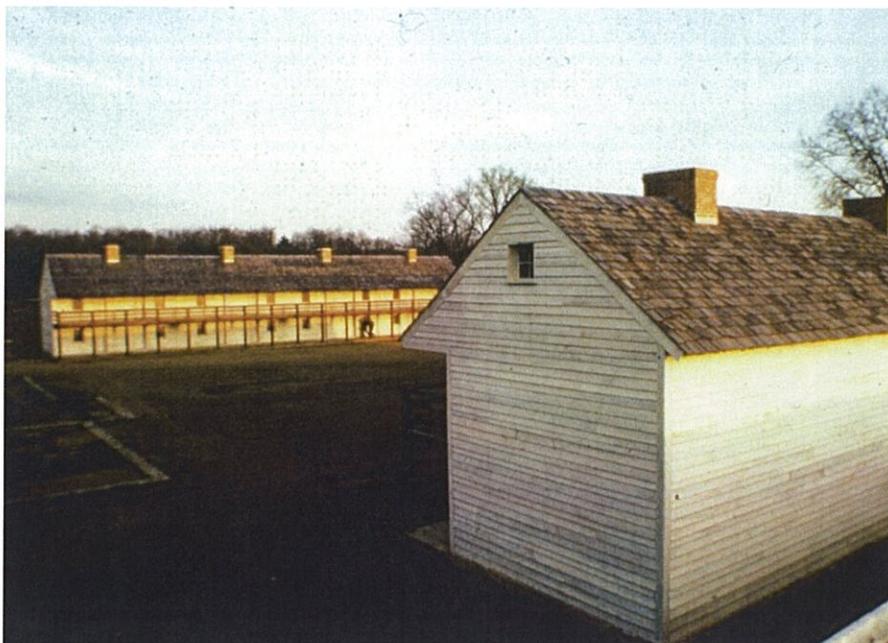
Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. September 11, 1975, east barracks interior under reconstruction; note stone facings on fireplaces, covering modern cinderblock to simulate a solid stone masonry.



Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. November 1975, east barracks upon completion of reconstruction. Photo by Dave Harp.

71

ATTACHMENT C



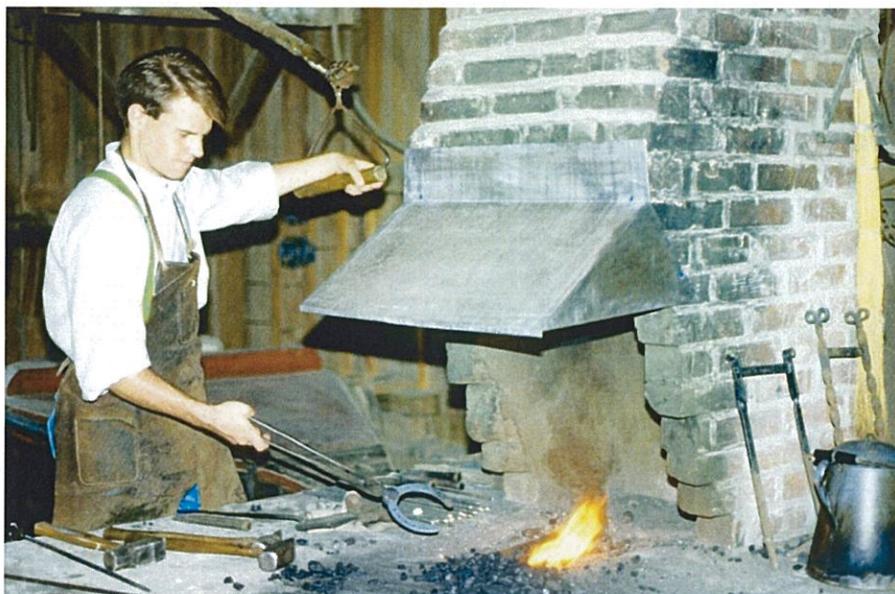
Fort Frederick State Park, Big Pool, MD. Photo from the Maryland Park Service, Department of Natural Resources. November 1875, west barracks (foreground) and east barracks upon completion of reconstruction. Photo by Dave Harp.



Reconstructed Blacksmith Shop-Herbert Hoover NHS-Image proved by the NPS

72

ATTACHMENT C



Blacksmith demonstrating in the Reconstructed Blacksmith Shop at Herbert Hoover NHS-Photo provided by the NPS.



Reconstructed Tryon Palace. New Burn, NC. Photo by Alyssa Holland.

ATTACHMENT C



Reconstructed Pennsbury Manor-Photo from the Pennsbury Manor Website.
<http://www.pennsburymanor.org/Photos.html>.

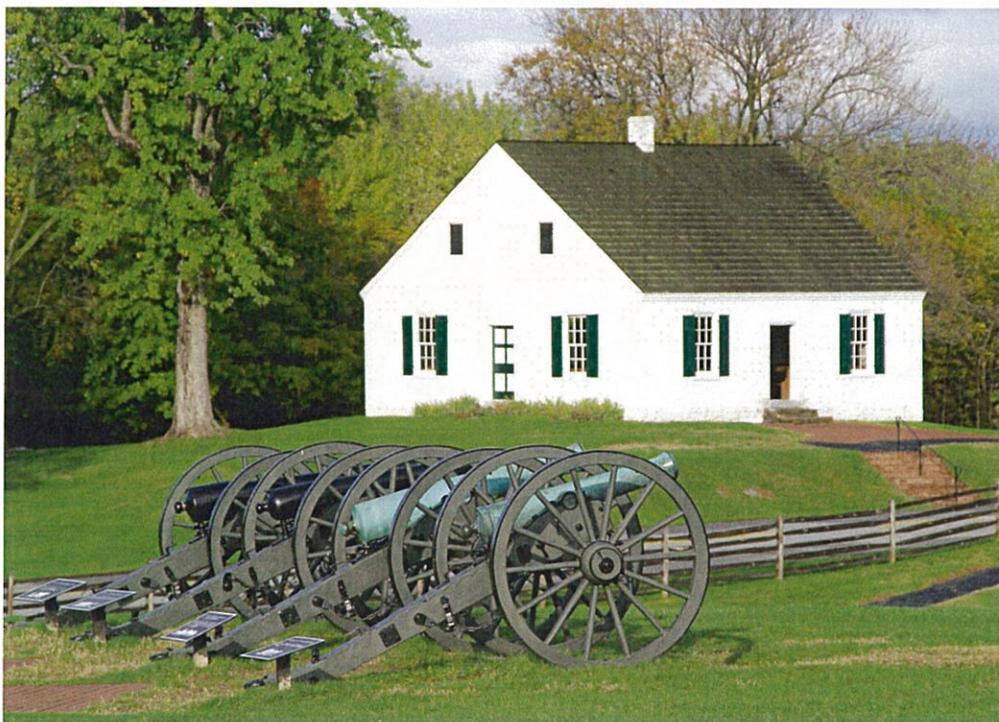


The Reconstructed Bent's Old Fort NHS-Photo taken from website-
<http://www.nps.gov/beol/historyculture/index.htm>.

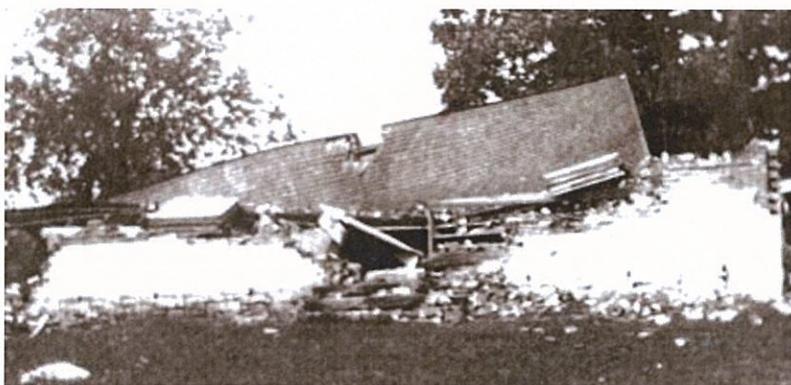


The Reconstructed Bent's Old Fort NHS-Carpenter Shop-Photo taken from website-
<http://www.nps.gov/beol/photosmultimedia/Virtual-Tour-of-Fort.htm>.

ATTACHMENT C



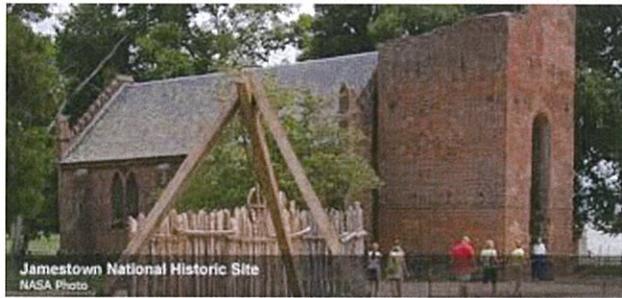
Reconstructed Dunker Church-Antietam National Battlefield-Photo taken from Website
<http://www.nps.gov/anti/photosmultimedia/Modern-Photographs.htm>.



Dunker Church destroyed by windstorm- Antietam National Battlefield-Photo taken from Website
<http://www.nps.gov/anti/historyculture/dunkerchurch.htm>.

75

ATTACHMENT C



Reconstructed Jamestown Church- Taken from website-<http://www.npca.org/parks/jamestown-national-historic-site.html>.



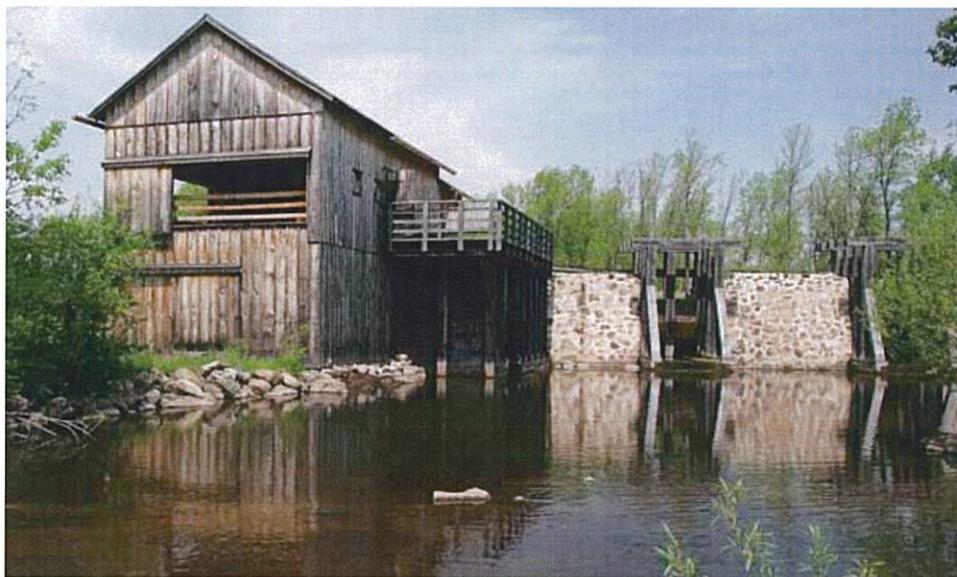
Parts of the original Jamestown Fort being reconstructed-Colonial National Historical Park



Fort Halifax's Reconstructed Blockhouse. Photo taken from website <http://www.maine.gov/doc/parks/history/forthalifax/index.htm>



Workers from Maine's Department of Conservation go after logs from the blockhouse that was destroyed by a flood in 1987. Photo taken from website <http://www.maine.gov/doc/parks/history/forthalifax/index.htm>



Reconstructed Sawmill at Wade House. Photo taken from website-
<http://wadehouse.wisconsinhistory.org/Explore/Sawmill/Riverview.aspx>.



Reconstructed Blacksmith Shop at Wade House. Photo taken from website-
<http://wadehouse.wisconsinhistory.org/Explore/Blacksmith/Dockstader.aspx>.

ATTACHMENT C



Reconstructed soldier hut at Morristown National Historical Park- Photo from-
http://www.cr.nps.gov/history/online_books/glimpses3/glimpses2b.htm



Fort Loudoun-Commandant's Quarters. Photo provided by Fort Loudoun State Park.

ATTACHMENT C

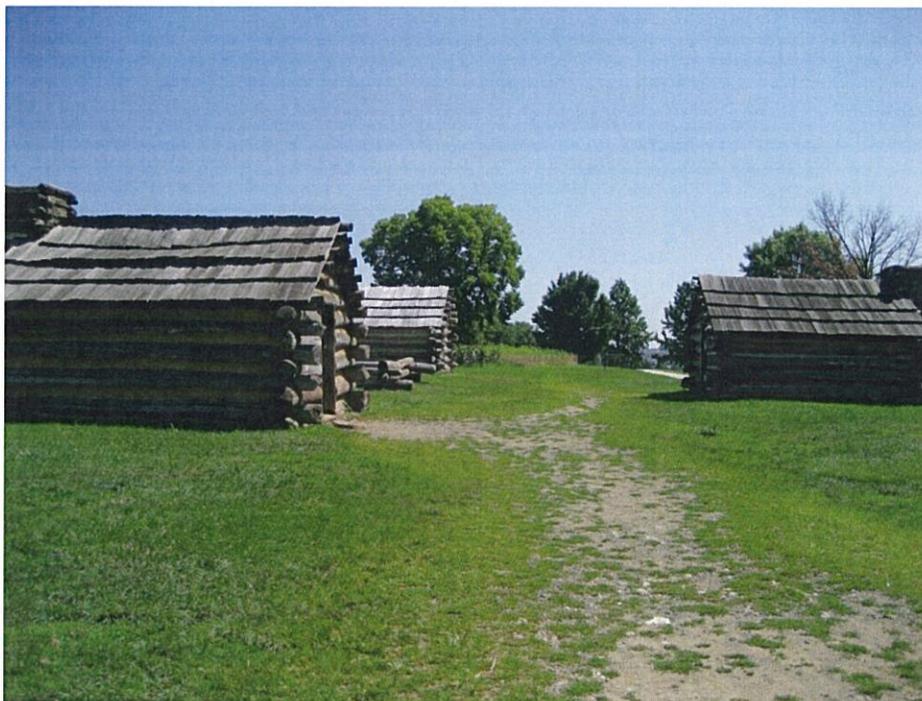


Fort Loudoun, TN. Photo provided by Fort Loudoun State Park.



Fort Loudoun View- Photo provided by Fort Loudoun State Park.

ATTACHMENT C

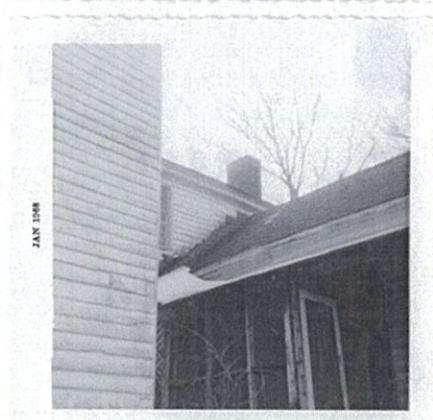
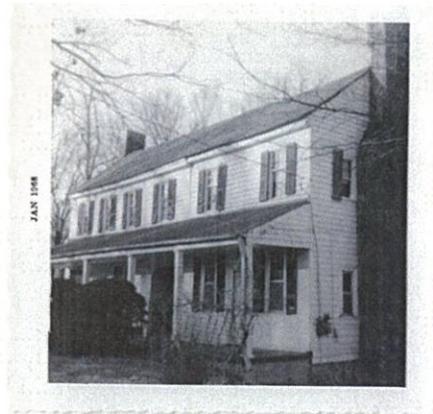


Reconstructed log huts-Valley Forge National Historical Park- Photo taken by Alyssa Holland



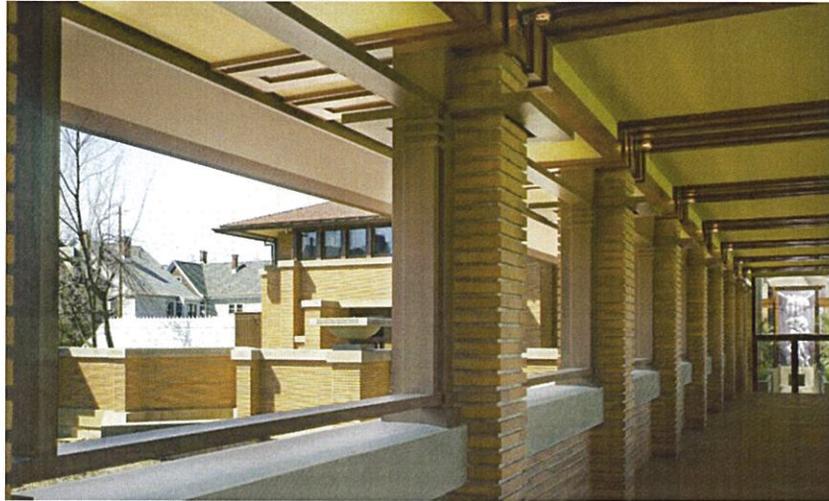
Reconstructed Fort Stanwix-Photo provided by the NPS.

ATTACHMENT C



Wright Tavern, Wentworth, NC : Color photos show reconstruction of rear ell. Other miscellaneous photos.

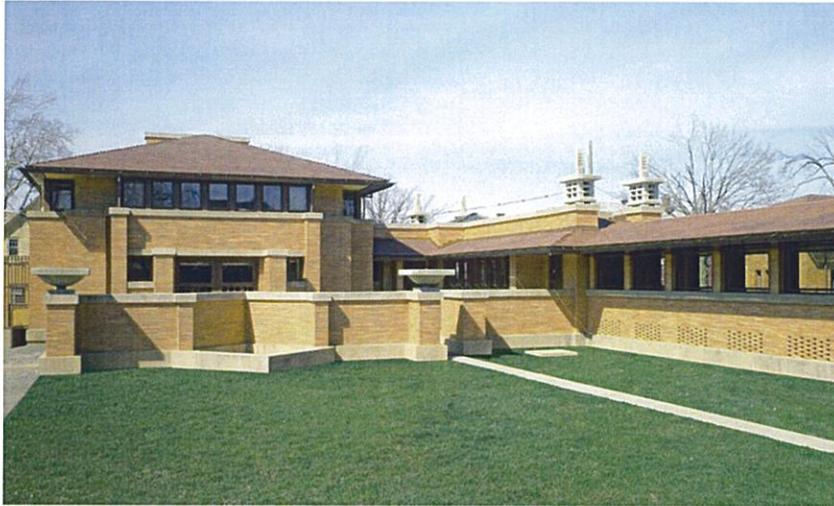
Photos provided by Rockingham County Historical Society



Reconstructed Pergola- Frank Lloyd Wright's Martin House- <http://www.darwinmartinhouse.org/tour.cfm#>.



Reconstructed Conservatory- Frank Lloyd Wright's Martin House- <http://www.darwinmartinhouse.org/tour.cfm#>.



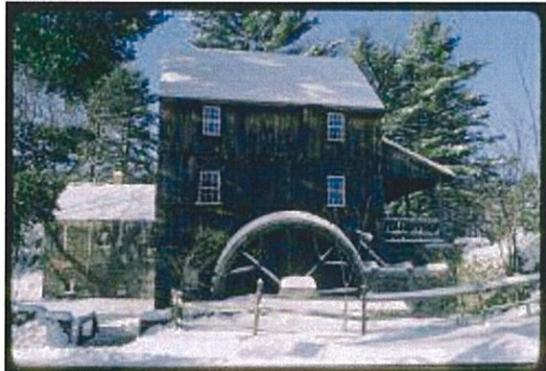
Reconstructed Carriage House-Frank Lloyd Wright's Martin House- <http://www.darwinmartinhouse.org/tour.cfm#>.



Courtesy of National Park Service

Reconstructed George Washington Birthplace home

ATTACHMENT C



Reconstructed Gristmill-Old Sturbridge Village. Photo taken from website.
http://www.osv.org/explore_learn/village_tour.html?S=L-23.



Reconstructed Sawmill- Old Sturbridge Village-Photo taken from website.
http://www.osv.org/explore_learn/village_tour.html?S=L-35.

ATTACHMENT C



One of George Frankenstein's paintings of the village of Appomattox Court House in 1866. "Main Street" facing east down the Lynchburg-Richmond Stage Road. McLean House and outbuildings on the right and the Courthouse straight down the road. Courtesy of Appomattox Court House National Historical Park.

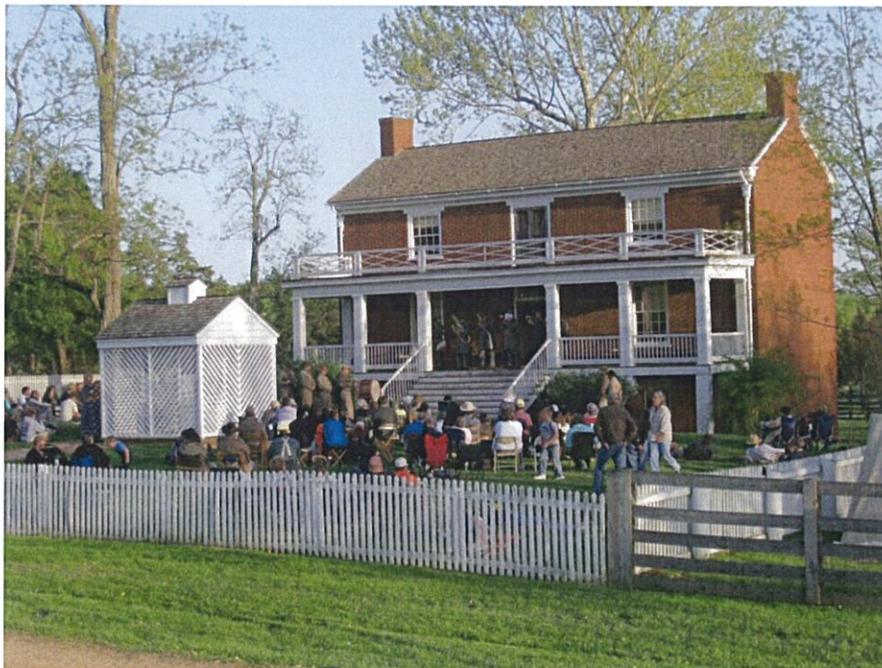


1865 McLean House- Courtesy of Appomattox Court House National Historical Park

ATTACHMENT C



Courtesy of Appomattox Court House National Historical Park

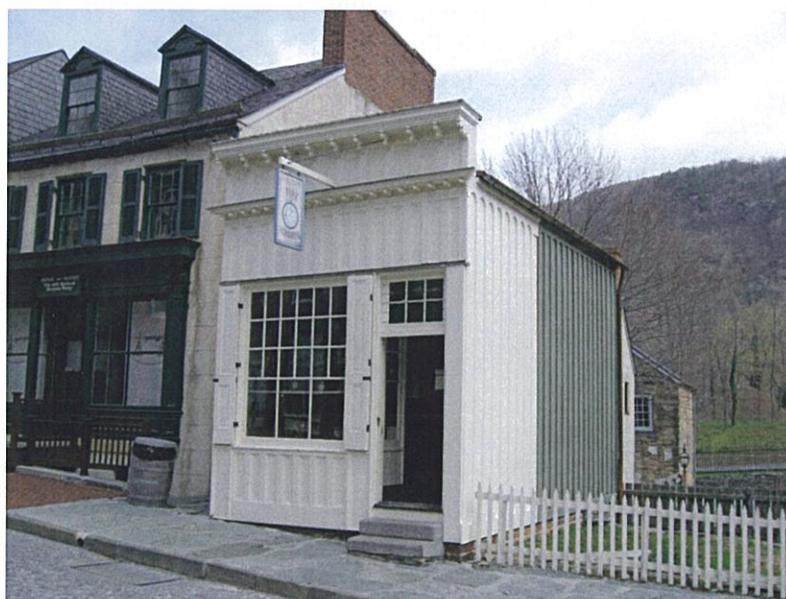


Reconstructed McLean House-Photo by Alyssa Holland

ATTACHMENT C

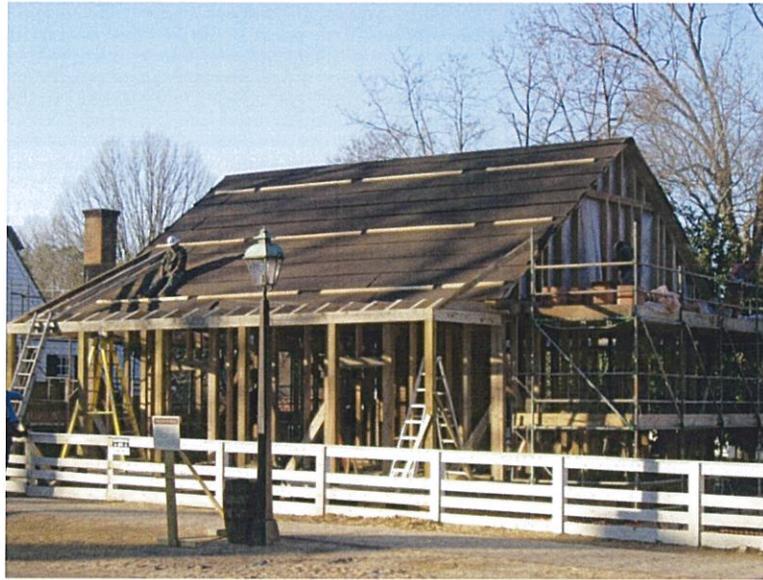


Reconstructed McLean House Slave Quarters and Kitchen-Courtesy of Appomattox Court House National Historical Park- <http://www.nps.gov/apco/historyculture/historic-structures-at-appomattox-court-house.htm>



Reconstructed Alfred Burton Jewelry Store at Harper's Ferry National Historical Site-Photo taken by Alyssa Holland

ATTACHMENT C



In the process of reconstructing the Richard Charlton's Coffee House in 2009 at Colonial Williamsburg-Photo taken by Alyssa Holland



The reconstruction of James Anderson's Kitchen, Blacksmith shop and a Public Armory which is currently going on in 2011 at Colonial Williamsburg-Photo taken from website-
<http://whatsnew.history.org/topics/armoury/>.

ATTACHMENT C



Franklin House steel "Ghost Structure" in Philadelphia, PA-Photo taken from website
<http://www.nps.gov/archeology/sites/npSites/franklincourt.htm>.



Polegreen Church "Ghost Structure"-Photo taken from website-
<http://www.historicpolegreen.org/visit/>

Chapter Three-Visitor Interviews

Historic sites want to attract visitors. What is the point to having or preserving a historic site without people coming to see it? That's why it is important to get the visitor's point of view on the subject of historical reconstruction. The first two chapters of this thesis focused on the history of reconstruction and how the professionals at historic sites felt about reconstruction. This chapter will venture into an area that no one has yet undertaken: the visitors' view on the reconstruction of historical buildings. Over the last seven years while working at Appomattox Court House I have been asked often by visitors which buildings are original. What happened to the original buildings? Why did the park service reconstruct the McLean House? These questions aroused my interest in asking visitors what they thought about the reconstruction of a historical building.

The first order of business was to find a historic location with reconstructed historical buildings that would allow me to interview visitors. The reason I could not survey at Appomattox Court House NHP was the superintendent decided that only National Park Service issued surveys were allowed on site. Red Hill, located in Charlotte County, Virginia, is where Patrick Henry spent the last five years of his life and is buried. The background of Red Hill starts in the 1770s when Richard Booker built the one and a half story plantation house for Booker and his family. The house is a wooden frame structure having three rooms downstairs and two rooms upstairs. In 1794 Patrick Henry and his family bought and moved into the house. Later the house was expanded by John

ATTACHMENT C

Henry, one of Patrick Henry's sons, who had inherited the property. The property stayed in the Henry Family even after Red Hill burned in 1919. After the last descendent of Henry died in 1944, the Patrick Henry Memorial Foundation was created to manage this historic site. This foundation was responsible for the reconstruction of all the historic buildings including the restoration of Henry's original law office. Red Hill, the main house, was reconstructed in 1957. Other reconstructions on site are the Carriage House, rebuilt on its original site, and the Slave's or Cook's Cabin, reconstructed with some of the wood from the original cabin. The Kitchen and Quarter Place Cabin are also historical reconstructions. On June 6, 1986, Congress designated Red Hill as Patrick Henry National Memorial. Though a national monument, the Patrick Henry National Memorial is still run by the Patrick Henry Foundation, a non-profit charitable corporation, and does not receive any federal funding from the National Park Service.¹¹³

Between December 2009 and May 2010, I surveyed visitors on-site and also had visitors send the survey back to me via mail. Of fifty surveys distributed, twenty-eight surveys were returned. At the time of this survey the average participant's age was 57.1 years old, all participants were white, and sixteen were women and twelve were men. Twenty-three out of the twenty-eight participants were from places in the state of

¹¹³ Most of the historical building reconstructions were done before the site became Red Hill National Monument. The site is protected by federal law, but lets the Patrick Henry Memorial Foundation run the site. It was the wish of the Department of the Interior "that the ownership of Red Hill remains non-Federal...costs of operations and maintenance for the estate shall be borne from non-Federal funds, services and material." *U.S. Senate Joint Resolution 187, January 21, 1986.* http://www.redhill.org/history/history_resolution_187.htm; "Red Hill National Monument," National Park Service Laws Supplement VI, 99th, 100th and 101th Congresses, January 1985-December 1990, pg. 568-570. <http://www.nps.gov/legal/parklaws/toc2.htm>; "Red Hill" National Register of Historic Places Inventory, National Park Service, United State Department of the Interior, http://www.dhr.virginia.gov/register/Counties/Charlotte/019-0027_Red_Hill_1978_Final_Nomination.pdf; Red Hill-The Patrick Henry National Memorial website. <http://www.redhill.org/memorialfoundation.htm>.

ATTACHMENT C

Virginia: Richmond, Keysville, Farmville, Gladys, Danville, Brookneal, Charlotte County, Yorktown, Herndon and Rustburg. Education levels for the surveyed included: three high school graduates, three with some college, one night college graduate, two with some post-graduate schooling, eight with master's degrees, one had some doctoral and two had their doctorate.¹¹⁴ Out of the twenty-eight surveyed twelve people are employed, nine retired, three kept house, one unemployed intern, two students and one retired but running a farm. When asked how often they traveled to historical sites eleven said they traveled some, eleven said they travel often and four traveled regularly.¹¹⁵ All visitors that were surveyed have visited historical locations with reconstructed buildings prior to visiting Red Hill.¹¹⁶

The first survey question was "How do you feel about an historic site reconstructing historical buildings?" Out of the twenty-eight visitors that answered surveys, twenty-five people remarked they were pro-reconstruction of historical buildings. Three respondents answered "that it depends on the situation" or on a "case-

¹¹⁴ Why this survey had a slightly highly education level than the normal group of visitors may be due to the site's isolated location. A visitor has to drive a distance into the country side to visit Red Hill, and no major roads or highways are in the area. A person really has to want to travel there, which would select for visitors with strong interest in history.

¹¹⁵ Occupations of the surveyed included an administrator, artist, farmer, manager, engineer, administration assistant, two homemakers, higher education, retired nurse, librarian, welder/fitter, engineer-telecommunications, two teachers, Intern/museum tech, tour guide, student, engineering educator, system analyst, home economics teacher, working on special education masters/mom, medical transcriptionist, former High School History teacher, and childcare/cleaning business/horse breeder and trainer. Household income: ten people with less than \$50,000, two with less than \$75,000, eight with less than \$100,000, six with more than \$100,000 and two that did not specify.

¹¹⁶ Information is from question two on the overall survey. Locations that the surveyed have visited that had historical reconstructed buildings include: Colonial Williamsburg, VA; Marbry Mill, Blue Ridge Parkway, VA; Poplar Forest in Lynchburg, VA; Jamestown, VA; Appomattox Court House NHP, Appomattox, VA; Genage, Canada; locations in Niagara Falls, NY; Ruffner Hall, Longwood University, Farmville, VA; George Washington Birthplace, Pope's Creek, VA; Mount Vernon's distillery, Mount Vernon, VA; Point of Honor, Lynchburg, VA; Old Salem, NC; locations within Philadelphia; Forest History Center in Minnesota; Polynesian Cultural Center, Hawaii Palace on Oahu; and locations throughout Europe, Canada and Asia.

by-case basis.” None of the participants mentioned any anti-reconstruction sentiment toward reconstructed historical buildings.

Nine of the twenty-five participants that were pro-reconstruction, and their answers came back stating “they approve or are fine with the idea of reconstructing historical buildings.” One respondent stated, “I definitely support it. We need to keep history alive for our future generations.” Another stated, “I approve. It seems to me the value at an historic site is to help the visitor learn about and, to the extent possible, experience the time and place of the historical event. Also, I want to be reminded that, hey, Patrick Henry walked through this door or at least a door that was where this door is now.” Another participant said, “If original drawings/paintings/architecture papers exist from which to reconstruct the site with a measure of fidelity to the original, then I support it. I do believe an archeologist should conduct an excavation prior to the reconstruction.”

Another participant stated:

I think it is wonderful. It allows today’s population to see, feel and experience life as it was 200 or more years old. I visited Andersonville, GA, Civil War Prison camp, 3 different times (85, 87, 89) with my children's 5th grade school trips. I would like to share each experience. '85-Bus drove through Guide described horrors students not interested because all that was there were gallery green hills that were beautiful. Kids could not imagine horrors being described. '87-Bus drove through, we stopped because they were beginning to build fort + there was a [sic] "soldiers," dressed as prisoner describing horrors. Kids were interested and asked questions. '89 Recreation completed. 2 sided fort with "no more land." Soldiers, Camp sites of sick + poor. The students walked around asked questions, saw with their own eyes the horrors of Andersonville in 1860's. My son + his friends still remember that 5 group trip + talk about it. My 2 daughters don't even remember the horror, only the cemetery. The recreation left an indelible mark to be remembered. That is what reconstruction should do to our children + anyone who visits historical sites.

ATTACHMENT C

Some of the responses from the survey takers who were pro-reconstruction emphasize their support for reconstruction for education and the preservation of history. One participant stated, "Excited! It's recreating history, even if they use the most modern technologies. I assume that because it is already an historic site, they have done the archeological work needed to discover all artifacts, wall lines, basements, trash, etc. So they should be able to reconstruct buildings with a great deal of accuracy." Another survey taker mentioned, "I support the idea. I think it helps to preserve history and promote education. Also commemorates and memorializes important historical sites." Another participant states, "I think it's wonderful that people have the foresight and means to reconstruct historical buildings." Another respondent answered, "It is, in my opinion, far better to try to reconstruct historical buildings than to leave them in continuing decline and disrepair." The last visitor stated, "It is the only way to share history with our present population to better exhibit our past. We cannot, in this day, appreciate how the people of those times lived with this reconstruction of their lives without visual aide[sic]."

Continuing with responses to question one, three participants commented on reconstruction being beneficial and enhancing the experiences of the site. One mentioned, "I feel that the historical plans and building enhances a person's experiencing in visiting the site." Another participant stated,

It is admirable, when done with authentic materials and attention to detail. It gives the visitor a true feeling of what the site was actually like when it was occupied during the date it is intended to represent. It also allows visitors to see activities being conducted (e.g. open hearth cooking, blacksmith work, etc.) without the problems of treating artifacts as museum pieces-that is, visitors can touch reproductions without the need for typical museum precautions (no gloves or velvet ropes are necessary).

ATTACHMENT C

From an educational experience perspective, perhaps it is more accurate for visitors to see a structure that looks "new") clean, well painted, fresh materials) rather than seeing materials that are 200+ years old, suffering from decay/aging and are "too valuable" to touch. For example, Patrick Henry would not have lived in a 200 year old house, with faded paint, flaking bricks, and worn floorboards.

Yet another response was, "Appreciate. Gives me a taste of history—though not authentic, still beneficial." The last response in this section is, "You get a much better feeling of the past when you can actually see & go in a building rather than just seeing a picture or hearing a person explain what was there." In chapter two, it is noted that staff complain at several historical locations that visitation remains low when there is nothing to see at the site. One of the participants stated that, "I think something well done is worth seeing--not as good as 'restored' but sometimes there is nothing to visit." There was one survey that was pro-reconstruction, but was very upset about the reconstruction at George Washington Birth Place. The survey stated, "The only one I found truly annoying was Washington's Birthplace. You go there and find out it is nothing like what would have been there when he was born."

Three respondents stated that it depends on the situation as to reconstructing a historical building. The first said, "I believe that it may be an appropriate course of action on a case-by-case basis." The second stated, "If it can be done with knowledge and proof of who it was, I am for it. However if it is based on guessing and embellishing what it could have been, I am against it." The last said, "It depends on the circumstances--if needed to tell the story. Also one must consider to what historical period you've relocating. It would have been inappropriate, for example, to have reconstructed the mansion that occupied this site after Patrick Henry's death. (note: In Europe, a great deal

ATTACHMENT C

of property bombed in WWII has been effectively reconstructed-Dresden, Cologne, Warsaw--etc).”

The next survey question was “Did the reconstructed buildings at this site enhance your visit?” All but one visitor wrote that the reconstructed structures did enhance the site. The explanations range from education to not wanting to visit if there weren’t reconstructed buildings. The surveyed stated that the reconstruction of the historical buildings enhanced their visit through educational value. One person wrote, “Yes, It is very educational to see how our founding fathers lived and how they supported their families.” Another person wrote, “Yes. I would know much less about this part of history had buildings not been reconstructed .” A different respondent stated, “Yes, because we were there to learn about Patrick Henry, + just seeing ruins + foundations couldn’t have told the story that well. Very nicely done.” Another participant stated, “Yes--especially those with people in period dress and working knowledge of that task.” The issue of education for children came up several times in the survey results. Another answer mentioned, “Yes-- The Slave Quarters, The Law Office. Everything so different from this day and time. Our Children and grandchildren need to see as well as read how things were in those days.” Another participant said “Absolutely! My sons especially loved the reconstructed blacksmith shop.” The final respondent said, “Yes, for example a reconstructed blacksmith shop is much more interesting and educational than an outline of the foundation where a building once existed. This is true for both adults and children, provided the reconstruction techniques adhere to the original methods/materials.”

Continuing with answers to question two, four respondents agreed that the reconstructed buildings enhanced the site because without these buildings the draw to

ATTACHMENT C

visit the site would not have been there. The first respondent said, "Yes. Without them [reconstructed buildings] there wouldn't be much to visit." The second answerer said that "yes--the house [Red Hill] is reconstructed and the site would be very empty without the house." The third wrote, "Yes. As I understand it, there were very few structures surviving. I don't think walking around a few foundations would have done too much for me." The final quote, "Yes! I can't imagine coming to see this site without the buildings. It's a lovely visit and the valley below but without the reconstruction the history would be all but lost. It was made clear by the interpreters that everything was a reconstruction and may not exactly replicate the original. This keeps it from being 'fake.'"

Other survey answers to question two mention historical accuracy. One respondent said, "Absolutely. Even though I know the buildings are not original. I know that the reconstruction is based upon historic records." Another stated, "Yes, because it was done according to the original blue print. I feel a sense of truth." The last statement concerning historical accuracy is, "The reconstruction is probably very realistic. I am familiar with the work of the architect for the reconstruction, Stanhope S. Johnson¹¹⁷, and I know his attention to detail."

The third question from the surveys was "Generally, how authentic do you think reconstructed buildings are?" Some of the respondents stated percentages, saying that the accuracy of the historic buildings are, "7 out of 10" or "70-80%" or a "4 out of five."

The largest group of answers to this survey question was the eleven participants stating that they believe the reconstructions to be accurate. One answered that it is

¹¹⁷ Stanhope S. Johnson, a Lynchburg, VA architect.

ATTACHMENT C

“Pretty good--better than nothing.” The next survey stated, “The ones that I have seen appear to be very accurate in their replication of the original. I think it is important to document the history and provenance of the original. (Great fire of 2001--Ruffner Hall at Longwood University)” Another respondent stated,

When done with care, the reconstruction building is just as accurate as the original. For example, the reconstruction of Jefferson's Poplar Forest retreat in Forest, VA is true to 'form and function.' All visible surfaces were (and continue to be) reconstructed with period tools, methods, and materials. Skilled craftsmen use the same methods as their predecessors from the 1810 time period. Another example is Williamsburg's recent reconstruction of the Charlton Coffee House on Duke of Gloucester Street. This building replaced a structure (Armistead Mansion from the antebellum period) and greatly improves the street scape.

Another answer was, “When done well, as in the cases I have mentioned, I think they are as authentic as possible.” Another commented,

If you are going to go to the trouble of reconstructing an historical building, and you are planning on presenting it as close to historic as possible, it would be optimal (of course) to research the project as thoroughly as possible. It is very good that here you have the plumbing and electricity in a building separate. Naturally the (or one) problem arises in deciding what modern conveniences to allow in the reconstruction.

The last survey stated, “The answer largely depends on material used, methods employed & adherence to the original plans. I do not believe it can be truly 'authentic', but reconstructions can evoke what was original & 'authentic.'”

Continuing with question number three, none of the participants stated “no” to this particular survey question of how authentic reconstructions are but there were several visitors that indicated that it depends on the situation or varies from site to site. The first respondent stated, “It depends. It is rarely 100% authentic because the original material may not be available and some guess work may come in play. It also depends on how

ATTACHMENT C

old the site is.” The second responded, “It varies from situation to situation” The third mentioned, “It probably varies but I trust that the scholarship behind the reconstruction is good. And even original structures are not static. Look at all the cathedrals with electric lights.”

Survey question four, “Is there ever a time where reconstructing a historical building would be considered inappropriate.” Five survey respondents said “no”. The first said, “I cannot think of why it could be considered inappropriate. After all it is our ‘history’ and we should try to keep it alive even if it could be considered ‘politically incorrect.’” Another thought, “No. Remember history and learn from it. Be thankful for our past! Live for today well, so tomorrow will be special as well. Remember the Truth! (Not a lie!)” And a third said, “I can’t think of any such time.”

Six of the participants surveyed stated that there are times when it would be seen as inappropriate. The first said, “Yes, I think it would not be appropriate to reconstruct a Nazi Concentration camp where thousands were murdered.” The next participant stated, “Yes I think so. If a building helps the visitor understand the historical significance of the building the site or better perhaps even a partly demolished building would be better left alone.” Another said, “Yes, when the social benefits derived from reconstruction do not justify the action.” A fourth mentioned, “Yes. Some stabilization + minor reconstruction is probably necessary. However, Ephesus, Anghor Wat, Egypt's pyramids etc, + Mayan sites in Central America are more effective as ruins than if reconstructed.”

The fifth survey question asked, “How would you feel about an historical site destroying an existing building in order to reconstruct a lost historical building?” This

100

ATTACHMENT C

relates to Fort Stanwix and Mount Vernon, where curators have destroyed buildings historical in their own right and reconstructed historical buildings better suited to the time period the site is interpreting. Five participants said that it was okay or did not see a problem destroying the existing building and reconstructing a new historical building. The first participant answered, "Fine if... New construction...Matches all measurements taken off old building." Another respondent mentioned, "OK if it is not someone's home" The last stated, "No problem."

Continuing responses to question five, twelve out of the twenty-eight respondents declared it depends on the situation. A sampling of the responses includes, "I think it depends on the building. For example I wouldn't want to see the Dome of the Rock in Jerusalem destroyed to look at the older temple mount it is built on. Or the White House to see the original from the War of 1812." Another surveyor said, "Depends on what is being destroyed. If it's not key to the historical perspective, for example a subsequent owner built a shed on the site, I wouldn't have a problem with its distinction. If it is a historical existing building, I'd like to see it preserved." Another respondent said, "If the existing building is not historically correct or if it is in a state of disrepair, then I'd have no problem with that. If the existing building is historical itself that's a different story and I would not be as supportive of it." Another stated, "It would depend on the existing building. If the existing building held no real value to history or its community, then destroy it and reconstruct." Another participant stated, "It depends on the existing building. Is the existing bldg. of any consequence?" Another said, "In general, I have no problem with it, but it does depend on a balance between the significance of the history and the value of the existing building. It might be necessary to be patient. The existing

101

ATTACHMENT C

building will depreciate. The historical significance will not.” The last respondent: “If the existing building was important like a hospital, school etc. I wouldn't expect it to be destroyed. I don't think a historical bldg [sic] needs to be on the exact location in the case.”

Four of the twenty-eight said that they were against destroying an exciting historical building in order to reconstruct a lost historical building. The first respondent stated, “I wouldn't approve.” Another participant said, “Don't destroy a historical site-- remember the history and preserve it for generations to come, the best you can. Remember history and learn from the good and challenging times. Don't repeat the bad mistakes, but learn from them. Remember the truth not a lie.” The third respondent said, “do not agree.”

The sixth and last survey question was, “How would you feel about a historical site dismantling an existing building and then reconstructing it somewhere else?” Eight out of the twenty-eight participants stated that they are not for relocating a historic structure. One stated, “I'm not as crazy about this, but there are plenty of examples where it has been done well and made sense.” Another respondent said, “I think it should stay where the original building was built.” Another commented, “A historical site should be kept in its existing location, (history) Remember the Truth!” Another stated, “Would not support. Not sure why you would relocate it.” The final wrote, “I disagree with this concept. It should be restored + preserved where it is to preserve the history.”

Five participants stated that it was alright to relocate historic buildings. “This can be very effective--a reconstructed rural village in Romania brought buildings from all

ATTACHMENT C

over the country. In a case like this, it gives you an idea of the diversity during a particular period. However, careful labeling + documentation is critical.” Another answered, “I have no problem with this. Many times the neighborhood around historical site changes. I would not want to lose the historical site forever. Moving it allows everyone to still enjoy it!” The next commented, “I’ve seen this done elsewhere on our travels and as long as it is done carefully, with regards to location and authentic landscapes, I believe it is a way to preserve history that may not survive otherwise.” The last survey taker wrote, “O.K. if that would preserve it or make it more accessible.”

Continuing responses to question six, five participants said that it depends on the situation. The first participant stated, “If it is the building that is significant and not the location, no problem. I have visited various outdoor museums where buildings have been collected from around the region. Very nice. On the other hand, I understand they removed the McLean house from Appomattox. That didn't make sense. Plus, I understand they lost it.” Another commented, “If it is an improvement building I am against it. It should stay in its original place. If it is a simple tobacco barn it is ok to move it. If it is a building that will be lost due to a dam and the formation of a manmade lake. Yes move it.” The last survey taker stated, “It depends on the situation. If the building is in danger of being lost forever I'd rather see it relocated than lost.”

Five respondents to question six said that it keeps history alive. The first survey participant said, “If the place for it to be part is a worthwhile site.” Another stated, “It helps keep history alive” Another commented, “Not good but can be done to preserve building from impending Natural Disaster ie. Flood” The next stated, “If it can't stay on the original site I think dismantling and reconstructing is a good option. The last

103

ATTACHMENT C

respondent said, “This is unfortunate since the original surroundings are altered. However, many historic structures are located in urban areas that no longer reflect the conditions that existed when the building was constructed (for example Boxwood, Trenton, NJ), therefore relocation to a different site preferably nearby, may be advantageous and increase the number of visitors. Likewise, relocation is certainly better than demolition because of economic factors and real estate values.”

Though a small survey at a relatively small historic site the data received from this study gives us an idea of what some visitors feel about a historical site reconstructing historical building(s). Visitor interview answers were very similar to historic site interviews. They believe that historic building reconstructions help educate, keep history alive, provide something to see and experience how people lived in the past. Most visitors believe that the building reconstructions are more often than not accurate. Visitors are interested in how accurate the historic reconstructions and some believe that reconstructing historical buildings is a case-to-case basis. The message those surveyed: If you can't make it accurate then don't do it. On the dismantling of a historical building and sending it to another site, only half agreed.

Visitors want to learn history; they do care about historical sites and about what historic sites do in the preservation and the reconstructing of building(s). The information on this survey can help historic sites, teachers, and scholars to see that people are interested in history, heritage, and historic buildings. Individuals working in historic preservation who think that everyday people are not intelligent enough to understand a reconstructed building should examine this survey. As previously stated, visitors to Appomattox Court House ask most often about the reconstructed McLean House (how

104

ATTACHMENT C

did the park service reconstruct it, are there any original pieces) and how many buildings in the historic village are originals? They also ask questions about buildings that no longer stand within the village and why they have not been reconstructed. The park has placed name markers at most historic buildings and has named, in the brochure, all the buildings that no longer stand to allow visitors to try to imagine how the village would have looked back in 1865. At least from this survey visitors appear to take away knowledge from historic sites that pertain to the reconstruction of historic buildings.

ATTACHMENT C



Front of main house at Red Hill National Memorial-Photo taken by Alyssa Holland

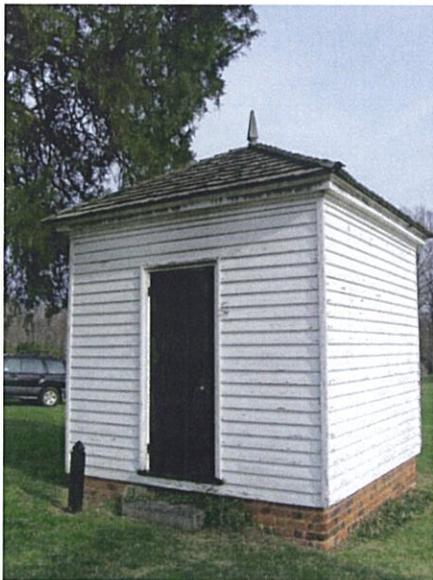


Front of Main House at Red Hill National Memorial-Photo taken by Alyssa Holland

ATTACHMENT C



Back of Main House at Red Hill National Memorial-Photo taken by Alyssa Holland



Reconstructed Smokehouse at Red Hill

Photo taken by Alyssa Holland



Reconstructed Kitchen at Red Hill

Photo taken by Alyssa Holland

107

ATTACHMENT C



Reconstructed Blacksmith Shop- Photos taken by Alyssa Holland



Reconstructed Blacksmith Shop- Photos taken by Alyssa Holland

Chapter Four-Conclusion

In 1938, Robert F. Lee, the second Chief Historian for the National Park Service, fought against the reconstruction of the McLean House at Appomattox Court House National Historical Park where Confederate General Robert E. Lee surrendered his army to Union General Ulysses S. Grant. Robert F. Lee believed that a “model” or paintings should be used as alternative interpretive tools instead of reconstructing the McLean House.¹¹⁸ If Robert F. Lee had had his way the McLean House would never have been reconstructed and thousands of people per year could not step into the same space where Robert E. Lee and Grant met. The reconstruction was well researched by the NPS using archeology, the 1892 blue prints, inside and outside photographs and other historic documents to bring the building back to life. Visitors today not only learn about the Lee’s surrender, but different time periods of preservation and architectural history.

Chapter one reviewed the debate over the reconstruction of historical structures. The main arguments against reconstruction were that they focus on only one period in a structure’s life, that reconstructions are inherently inaccurate, and that they are not economically practical. Opponents also charge that reconstructions destroy archeology and present maintenance problems. Most important, they claim that visitors don’t

¹¹⁸ Barry Mackintosh, “National Park Service Reconstruction Policy and Practice.” *The Reconstructed Past: Reconstruction in the Public Interpretation of Archeology and History*, ed. John Jameson, Jr. (Walnut Creek, CA: AltaMira Press, 2004).

ATTACHMENT C

understand the difference and perceive a fake as genuine. On the other hand pro-reconstruction writers want to use the reconstructions as interpretive and educational tools for the public, especially at sites without any surviving structures and/or to add to the historical context of a site with some structures.

Chapter two analyzed the interviews with individuals who work at historical sites today. Those who are pro-reconstruction stated the following reasons for their views, which echoed the arguments of the pro-reconstruction writers. First, education for all ages, teaching about the history of the site, using the reconstructed building for living history and the tangibles of how a building looks, feels and smells. Second, having a historical building to see when visiting a site. Third, reconstruction preserves heritage for future generations. Fourth, as the only structure of its kind at location or area with historic structures. The pro-reconstruction arguments in the literature correspond with experience in the field.

Some of the individuals interviewed who worked at historic sites qualify their support by arguing that reconstruction must be on a case-by-case basis. As one person stated, "it depends on the situation when it comes down to reconstructing historical buildings." Others noted, as opponents of reconstruction had warned, that political and social pressures from local constituents were the reason for the reconstruction at some sites. One said that "they did not have a choice, but to reconstruct over a site."

A few site workers opposed reconstructing historical buildings, and they had several reasons for that opposition. First, the fear of the historical site falsifying history or how the building would appear to the public. Second, to protect an archeological site

ATTACHMENT C

from reconstruction. Third, to put the money toward a historical building rather than toward a reconstruction. Fourth, some say, incorrectly, that reconstruction violates the Department of the Interior Standards for the preservation of historical buildings.

Chapter 3 analyzed the visitors' views from the interviews at Red Hill National Monument which generally favored the reconstruction of historical buildings. Most participants said that the reasons they favored reconstruction included: enhancing the experience at the historic site, for educational purposes, keeping history alive for this and future generations, for visitors who want to see something tangible when they go to a historical site, and finally, visitors more fully appreciate how people lived with the buildings to show how they lived. Only three respondents stated "that it depended on the situation" or "case to case basis" as to the reconstruction of historical buildings. None of the visitors stated they were against reconstructions.

Visitors again are the reason we have historic sites. What is the point to having or preserving a historic site without people coming to see it? Historical sites continue to reconstruct historical buildings. Colonial Williamsburg reconstructed the Richard Charlton Coffeehouse in 2008 and is currently working on the James Anderson blacksmith shop and public armory. Fort Dobbs, a French and Indian War site, in Statesville, North Carolina, after years of archeology and research, is beginning the reconstruction of the fort. As long as we want visitors to visit historic sites, many sites will consider reconstructing historical buildings.

The debate over reconstructed historical buildings will go on as long as there are historical reconstructions. In my opinion, as supported in the literature and the survey,

decisions are truly on a case-to-case basis. Does the site have enough historical and archeological information? Can it afford maintenance for the historical reconstruction over time? How recently was a structure lost or destroyed or damaged? Visitors do care about the what, where, and why of historical buildings and the land they occupy. At APCO questions about which buildings are original start in the visitor center, as visitors ask about the village and what happened to the buildings, particularly the original McLean House. The questions about reconstructed and original buildings are central to interpretation at the park.

Another consideration in the literature and the surveys is the interpretive space a reconstruction creates. APCO visitors care about the space once they enter the reconstructed McLean House and the room where General Robert E. Lee and General U. S. Grant stood in 1865 at the end of the American Civil War. Visitors come from all over the United States and from most areas of the world, and although some stand in the surrender room for a few seconds, others stand for ten minutes or more. That space is as meaningful as the few original pieces of furniture and five thousand original bricks in the front of the house. The hard work of the NPS, who completed the research and reconstruction that allows visitors to stand in the space that structurally reproduces the original, made those visitor experiences possible.

Even if a visitor is not a "history person," many people do care about their history. This particular reconstruction helps make my job important and worthwhile. Watching someone walk outside to touch the original brick, stop to take pictures of the original vases, or slowly walk into the parlor room and stand in silence in a space where

112

ATTACHMENT C

history was made, in my opinion justifies the reconstruction of the McLean House and other historical buildings.

Fortunately, the debate over reproductions appears to have educated staff and visitors at Appomattox and elsewhere. From the survey, visitors seem to remember where they have seen reconstructions and sometimes what happened to the original buildings. With most sites paying close attention to federal preservation laws and informing the visitor which buildings are original through brochures, exhibits, online information and interpretive talks the public is informed. The public does appreciate all the information a site can give on the historical building(s) and about the reconstructions and the preservation of original buildings. Sites that continue to reconstruct and follow all the preservation laws and regulations and inform the public on why the site reconstructed the building are getting it right. Even with a situation where a politician(s) are pushing a historical site toward reconstructing a historical building, such as what happened at Fort Stanwix, the sites seem to follow the Department of the Interior and NPS standards for preservation and reconstruction.

Bibliography

Manuscript Collection:

Harpers Ferry, WV

Harpers Ferry Center, Harpers Ferry National Historical Park, National Park Service.

Mission 66 National Park Service History Collection HC RG 23

Pitcaithley Reconstruction Files HC RG 63

Proposed Area Collection RG 51

Robert F. Lee Papers RG 1

Government Documents:

Advisory Board Minutes, 7-9 May, National Register, History, and Education (NRHE files).

Administrative Policies for Historic Areas of the National Park Service, (U.S. Department of the Interior: National Park Service) 1973.

Federal Historic Preservation Laws, Preservation of Historic Sites Act, August 21, 1935 (49 Stat. 666; 16 U.S.C.)

National Historic Preservation Act 1966 (80 Stat. 915)

Historic Sites Act of 1935, Public No.292-74th Congress

Organic Act on August 25, 1916 (39 Stat. F35)

Site Email Interviews: (Site worked at the time of the interview)

Patrick Schroeder, Appomattox Court House NHP, February 19, 2008.
Joe Williams, Appomattox Court House NHP, February 18, 2008.
John Spangler, Appomattox Court House NHP, February 19, 2008.
Michelle Zupan, Hickory Hill & the February 2, 2008.
Jane Custer, Antietam National Battlefield, May 20, 2008.
Greg Holt, Bent's Old Fort National Historic Site, February 19, 2008.
Steve Whitesell, San Antonio Missions National Historical Park, March 10, 2008.
William Kelso, Preservation Virginia, July 31, 2008.
Cary Wiesner, Herbert Hoover National Historic Site, February 20, 2008.
Neil Korsmo, Herbert Hoover National Historic Site, February 2, 2008.
Mike Kusch, Fort Stanwix National Monument, February 18, 2008.
Lara Murphy, Pennsbury Manor, February 18, 2008.
Tom Kelleher, Old Sturbridge Village, February 6, 2008.
Timothy Preston Long, Valley Forge National Historical Park, February 10, 2008.
Eric Jackson-Forsberg, Martin House Restoration Corporation, June 30, 2008.

Site Oral Interviews:

Dennis Fry, Harpers Ferry National Historical Park, April 8, 2008.
Tim Hall, Maine Department of Conservation, August 12, 2008.
David Simmons, Wade House Historic Site, March 4, 2008.
Jeff Wells, Fort Loudoun State Historic Area, March 18, 2008.
Patrick Schifferdecker, North West Co. Fur Post, July 2, 2008.
Kitty Williams, Rockingham County Historical Society, March 11, 2008
Steve Smith, Fort King George Georgia State Historic Site, June 3, 2008.
Molly McKenzie, Cahokia Courthouse State Historic Site Complex, April 15, 2008.
Jim David, Ocmulgee National Monument, March 19, 2008.
Ross Kimmel, Maryland Park Service, May 21, 2008.
Jim Barnett, Mississippi Department Archives and History, March 19, 2008.
Jade Pfister, Morristown National Historical Park, March 5, 2008.
Steve Brisson, Mackinac State Historic Parks, February 27, 2008.
Dick Lahey, George Washington Birthplace National Monument, March 4, 2008.

ATTACHMENT C

Beth Hill, Fort Dobbs North Carolina State Historic Site, March 18, 2008.

Jean Neff, Amherst Museum, March 12, 2008.

Peter Dessauer, Harpers Ferry National Historical Park, April 9, 2008.

Kay Williams, Tryon Palace, March 2, 2009.

John Hossley, Ethan Allen Homestead Museum, March 5, 2008

Lectures:

Ethics In Preservation: Lectures Presented at the Annual Meeting of the National Council for Preservation Education, Indianapolis, Indiana, October 23, 1993.

Newspaper and Magazines Articles:

Carpenter, Richard P. "Early Days Recreated again in Salem's Pioneer Village." *The Boston Sunday Globe*. September 20, 1987.

Ogden, Eloise. "Bourgeois House, Fort Union Project Advances." Wednesday, June 10, 1987 Minot (N.D.) Daily News.

Secondary Sources:

Books:

Barthel, Diana. *Historical Preservation Collective Memory and Historical Identity*. New Bruswick: Rutgers University Press, 1996.

Cauble, Frank P. *Biography of Wilmer McLean*. Lynchburg, Virginia: H. E. Howard, Inc., 1987.

Couvillon, Mark. *Patrick Henry's Virginia: A Guide to the Homes and Sites in the Life of an American Patriot*. Patrick Henry Memorial Foundation, 2001.

Grimmer, Anne E and Kay D. Weeks. *The Secretary of the Interior's Standards for the Treatment of Historical Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historical Buildings*. Washington, DC: National Park Service, 1995.

ATTACHMENT C

Hosmer, Charles B. Jr. *Presence of the Past: A History of the Preservation Movement in the United States Before Williamsburg*. New York: G.P. Putnam's Sons, 1965.

Jameson, John H., Jr., ed. *The Reconstruction Past: Reconstruction in the Public Interpretation of Archaeology and History*. Oxford, UK: Alta Mira Press, 2004.

Kelleher, Michael James. "Making History: Reconstructing Historic Structures in the National Park Service." University of Pennsylvania, Unpublished thesis, 1998.

Lee, Antoinette J. and Strip, Robert E., ed. *The American Mosaic: Preserving a Nation's Heritage*. Washington, D.C.: US/COMOS, 1987.

Morton, W. Brown. *The Secretary of the Interior's Standards for Historical Preservation Project: With Guidelines for Applying the Standards*, Washington, D.C.: U.S. Department of the Interior, 1985.

Strip, Robert E. *A Richer Heritage: Historic Preservation in the Twenty-First Century*. Chapel Hill: The University of N.C. Press, 2003.

Articles:

Bruner, Edward M. "Abraham Lincoln as Authentic Reproduction: A Critique of Postmodernism." *American Anthropologists* 96 (2) pp. 397-415.

Caldwell, Mike. "The Fort Stanwix Administrative History: A Superintendent's Perspective," *The Public Historian*, Vol. 31, No. 2 (May, 2009) .

Chappel, Edward A. "Open-Air Museums: Architectural History for the Masses." *The Journal of the Society of Architectural Historian*. Vol. 58, No.3 (Sept., 1999) pp. 334-341.

ATTACHMENT C

- Cliver, E. Blain. "Reconstruction: Valid or Invalid." *History Preservation* Oct/ Dec. 1972 pp. 22-24.
- Hedren, Paul. "Why We Reconstructed Fort Union" *The Western Historical Quarterly*, 23 (Aug., 1992): 349-354.
- Kimball, Fiske. "The Preservation Movement in America." *The Journal of the American Society of Architectural Historians*, Vol. 1, No. 3/4, Preservation of Historical Monuments (Jul-Oct, 1941), pp. 15-17.
- Lounsbury, Carl R. "Beaux-Arts Ideas and Colonial Reality: The Reconstruction of Williamsburg's Capital, 1928-1934." *The Journal of the Society of Architectural Historians*, Vol. 49, No.4 (Dec., 1990), pp.373-389.
- Mackintosh, Barry. "To Reconstruct or Not to Reconstruct: An Overview of Policy and Practice," *Cultural Resource Management Bulletin*, Vol. 13: No., 1 (1990).
- , "Interpretation: A Tool for NPS Expansion," (unpublished manuscript, 1991).
- Matero, Frank. "The Conservation of Immoveable Cultural Property: Ethical and Practical Dilemmas." *JAIS*, 32 (1993) PP.15-21.
- , *Reconstructing Fort Union*. U.S.: University of Nebraska, 2001.
- Mandell, Patricia. "Details, Details, Details." *Americana*. December 1989.
- "McLean House Reconstructed Assured" in *The Regional Review*, Vol. 5 No. 6, (Dec. 1940).

ATTACHMENT C

Pitcaithley, Dwight and Richard Sellers. "Reconstruction-Expensive, Life size toys." *Cultural Resource Management Bulletin*, December 1979.

Shackel, Paul A. "Resilient Shire." *Archaeology*. Pitcaithley Files National Park Service HC RG63.

Schwazer, Michell. "Myths of Permanence and Transience in the Discourse on Historic Preservation in the U.S." *Journal of Architecture Education* (1984), Vol. 48, No.1 (Sept.,1994) pp.2-11.

"The Great Reconstruction Controversy: A Debate and Discussion." *Cultural Resources Management Bulletin*. Vol. 13: No.1, 1990.

Wheaton, Rodd. "Considering Reconstruction as an Educational Tool," *Cultural Resource Management*, Vol.15: No.1, 1992.

Papers:

Wheaton, Rodd. "To Reconstruct or Not Reconstruct: Decision Within Documentation," Paper Present at the Annual Meeting if the Association for Preservation Technology, Sept. 1985.

Websites:

Appomattox Court House National Historical Park. National Register of Historic Places, United States Department of the Interior, National Park Service.
<http://pdfhost.focus.nps.gov/docs/NRHP/Text/66000827.pdf>.

A Brief History of the National Park Service.
www.nps.gov/history/history/online_books/kieley23.htm

Antietam National Battlefield Website. <http://www.nps.gov/anti/>.

Appomattox Court House National Historical Park Website.

ATTACHMENT C

<http://www.nps.gov/apco/>.

Alamance Battlefield Website.

<http://www.ah.dcr.state.nc.us/Sections/hs/alamance/alamanc.htm>

Amherst Museum Website. <http://www.amherstmuseum.org/>.

Bent's Old Fort National Historical Site Website.

<http://www.nps.gov/beol/>.

*Bent's Old Fort or Fort Williams, National Register of Historic Places
Inventory-Nomination Form.*

http://www.nps.gov/history/history/online_books/beol/beol_nr.pdf.

Bennett Place Website.

<http://www.ah.dcr.state.nc.us/Sections/hs/bennett/bennett.htm>.

Booker T. Washington National Monument Website.

<http://www.nps.gov/bowa/>.

Cahokia Courthouse State Historical Park Website.

http://www.illinoishistory.gov/hs/cahokia_courthouse.htm.

“Chapter Seven: The ‘Complete Restoration’ of Valley Forge.” Valley Forge
National Historical Park. The Pennsylvania State University Press,
1995. www.nps.gov/archive/vafo/treese/treese7.htm

Colonial National Historical Site Website. <http://www.nps.gov/colo/>.

Colonial Williamsburg Foundation Website. <http://www.history.org/>.

Director's Order #28: Cultural Resource Management. National Park
Service. <http://www.nps.gov/policy/DOrders/DOrder28.html>.

ATTACHMENT C

The Dunker Church on the Antietam National Park Website.

<http://www.nps.gov/anti/historyculture/dunkerchurch.htm>.

Dunker Church. List of Classified Structures, Cultural Resources Division.

www.hscl.cr.nps.gov/insidenps/report.asp.

Ender, Cavan. *The Venice Charter Under Review.*

<http://www.international.icomos.org/venicecharter2004/erder.pdf>.

Ethan Allen Homestead Website. <http://www.ethanallenhomestead.org/>

“Expansion of the National Park Service in the 1930s: Administration History.” Appointment and Early Activities of the Advisory Board.

http://www.cr.nps.gov/history/online_books/unrau-williss/adhi5l.htm.

Fort Frederica National Monument Website. <http://www.nps.gov/fofr/>.

Fort Halifax on the Kennebec Website.

<http://www.maine.gov/doc/parks/programs/history/forthalifax/index.htm>.

Fort Halifax Blockhouse, National Register of Historic Places Inventory - Nomination Form.

<http://pdfhost.focus.nps.gov/docs/NHLS/Text/68000015.pdf>.

Fort Laramie National Historic Site Digital Preservation.

[Http://archive.cyarch.cyark.org/fort-larmie-intro](http://archive.cyarch.cyark.org/fort-larmie-intro).

Fort Laramie National Historic Site. www.nps.gov/fofa/index.htm.

Fort Larned National Historical Site Website. <http://www.nps.gov/fols/>.

ATTACHMENT C

Fort Loudoun State Historical Area Website. <http://www.Fortloudoun.com>.

Fort Massac State Park Website. <http://dnr.state.il.us>.

Fort Meigs Ohio Historical Site Website. <http://www.fortmeigs.org/ohs.htm>.

Fort Michilackinac State Park Website.
http://www.mackinacparks.com/parks/colonial-michilimackinac_7/.

Fort Scott National Historical Site Website. <http://www.nps.gov/fosc/>.

Fort Snelling Minnesota Historical Site Website.
<http://www.mnhs.org/places/sites/hfs/>

Fort Stanwix National Monument Website. <http://www.nps.gov/fost/>

Fort Union Trading Post National Historical Site Website.
<http://www.nps.gov/fous/>

*Greenfield Village & Henry Ford Museum (Edison Institute), Detroit; A
National Register of Historic Places Travel Itinerary.*
<http://www.nps.gov/nr/travel/detroit/d37.htm>.

Grand Village of the Natchez Indians Website. <http://www.mdah.state.ms.us>.

Greenbank Mill Website. <http://www.greenbackmill.org>.

Harpers Ferry National Historical Park Website. <http://www.nps.gov/hafe/>.

Herbert Hoover National Historical Site Website. <http://www.nps.gov/heho/>.

Herrling Sawmill Website.
<http://www.wisconsinhistory.org/wadehouse/sawmill.asp>.

ATTACHMENT C

Historic New England Website. <http://www.historicnewengland.org/about-us/founder-and-history-1>

Historical Village of the Rockingham County Historical Collection Website.
<http://www.rockinghamhistory.com>

Horsley, Cater B. *The Real America: Architecture and Illusion.*
<http://www.thecityreview.com/hux.htm>

Independence National Historical Park Website.
<http://www.nps.gov/inde/>

Independence NHP Archeology at Franklin Court. Archeology Program,
National Park Service, U.S. Department of the Interior.
<http://www.nps.gov/archeology/sites/npSites/franklincourt.htm>.

Log Cabin Village Website. <http://www.logcabinvillage.org>.

Matero, Frank. "Ben's House: Designing History at Franklin Court, Philadelphia," *Archeology Institute of America.*
http://www.archaeological.org/pdfs/sitepreservation/Matero_2010_v.6.pdf.

Mission San Jose y San Miguel de Aguayo or Mission San Jose National Historical Park. <http://www.nps.gov/saan/>.

----- <http://www.nps.gov/saan/historyculture/sanjosehistory1.htm>.

Mission San Luis Website. <http://www.missionsanluis.org>.

Mt. Vernon-George Washington's Home Website.
<http://www.mountvernon.org/>

ATTACHMENT C

North West Company Fur Post Website.

<http://www.mnhs.org/places/sites/nwcfp/>.

Ocmulgee National Monument Website. <http://www.nps.gov/ocmu/>

Old Salem Website. <http://www.oldsalem.org>

Old Sturbridge Village Website.

Pennsbury Manor Website. <http://www.pennsburymanor.org>

Red Hill National Monument Website.

http://www.redhill.org/rhcontact_all.htm

“Red Hill” National Register of Historic Places Inventory, National Park Service, United State Department of the Interior,

http://www.dhr.virginia.gov/registers/Counties/Charlotte/019-0027_Red_Hill_1978_Final_Nomination.pdf

“Red Hill National Monument,” National Park Service Laws Supplement VI, 99th, 100th and 101th Congresses, January 1985-December 1990, pg.

568-570. <http://www.nps.gov/legal/parklaws/toc2.htm>.

Rifkind, Carole. “Faking It.” *Metropolis Feature*. January 1998.

http://www.metroplismag.com/html/content_0198/ja98hux.htm

Roy Rosenweig and David Thelen. *The Presence of the Past: Popular Uses of History in American Life*. Methodological Appendix.

<http://chnm.gmu.edu/survey/procedures.html>.

Salem Maritime National Historical Site Website. <http://www.nps.gov/sama/>

ATTACHMENT C

The Secretary of the Interior's Standards for the Treatment of Historical Properties: Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historical Buildings Website.
<http://www.cr.nps.gov/hps/tps/standguide/>.

Tryton Place Website. <http://www.tryonpalace.org/>.

The Reconstruction of the Blacksmith Shop, Construction, Maintenance & Landscaping, 1939-1970, The Hoover Houses and Community Structures: Historic Structures Report.
http://www.cr.nps.gov/history/online_books/heho/hsr/chap1h.htm.

U.S. Senate Joint Resolution 187, January 21, 1986.
http://www.redhill.org/history/history_resolution_187.htm.

Valley Forge National Historical Park Website. <http://www.nps.gov/vafo>

Vita

Alyssa Gay Holland was born December 31, 1980, in the Town of Lagrange, Georgia. She graduated from Thomas Dale High School, Chester, Virginia in 1999. She received an Associate in Science Degree from Richard Bland College in Petersburg, Virginia in 2001. She received a Bachelor of Arts in History from Longwood University in Farmville, Virginia in 2004. From the fall of 2004 through the spring of 2006 worked part time as a Park Guide at Appomattox Court House National Historical Park part of the National Park Service. In the Spring 2006 received a permanent full time Park Guide position at Appomattox Court House National Park Service with the National Park Service.

126

ATTACHMENT C

120

126



Date: April 8, 2016
From: Rockville Planning Commission
To: Rockville Mayor and Council
Subject: **Chestnut Lodge Project Plan amendment**

In your agenda material for the proposed Chestnut Lodge project plan amendment, you have the Planning Commission's formal recommendation and comments that were made during our review of the proposed amendment on March 9, 2016. As you know, the Commission made a recommendation that the amendment not be approved, and the reasons for our recommendation are identified in the agenda transmittal you received.

However in a subsequent meeting and follow up discussion, the Commission expressed the need to convey an additional issue for your consideration.

Preliminarily, we observe that when the Lodge structure was destroyed, the centerpiece of the PRU was destroyed. Substantial leniencies and accommodations were made throughout the PRU (lots, setbacks, larger footprint, etc.) in order to facilitate preservation of the Lodge building via condoization. The Lodge building was to be preserved and would consist of seven residential condominium units. Loss of the Lodge building took away the centerpiece, without which the remaining PRU made little sense. Before proposing modern structures, resort should have been made back to the approving authority (the Mayor and Council) to obtain redefinition of what the standard for the PRU should be. In the present instance, the developer stated from the beginning that he had no interest in rebuilding the lodge structure; so the preliminary issue of setting the standard for replacing the Lodge building has not been first addressed and is addressed in the instant application only in the context of attempting to ward off any alternative that may be presented.

128
CHESTNUT LODGE PRU AMENDMENT – Citizen Input ATTACHMENT C

Andrew Sellman, 411 West Montgomery Avenue, Rockville, MD 20850 sellmana@verizon.net

Written and Oral Citizen Testimony: Project Plan Application.PJT2015-00005,a Proposed Amendment to the Approved Planned Development (PD) for Chestnut Lodge, at 500 West Montgomery Avenue; JNP Chestnut Lodge LLC, Applicant

Part I – Oral Testimony

Part 2 – Written Testimony (much more detailed and with photographs and drawings)

RECEIVED
CITY CLERK'S OFFICE
2016 APR 20 PM 2:01

RECEIVED
APR 20 2016
COMMUNITY PLANNING
AND DEVELOPMENT SERVICES

Part I - Sellman

My name is Andrew Sellman and I live at 411 West Montgomery Ave, in Rockville's West End, since 1998. I'm an historic home owner and have a strong interest in Historic Preservation of all kinds and methods since the age of 18.

I do want to talk about a new word being bounced around the city recently, Reconstruction. You have already received in your package a Master's Thesis on Historical Reconstruction, but I done some field work on my own which I would like to share with you. Everything I briefly mention in the next few minutes is also included in my accompanying written testimony, but with much more detail or accompanying photographs. I hope you have or will find time to read the written testimony before making a final determination on the PRU amendment.

These are sites I personally visited...

I. Appomattox Court House National Historical Park, Southern Virginia

This month is the 150th anniversary of a national historical event: The surrender of the the Army of Northern Virginia from General Lee to General Grant, with event taking place in a private residence, the McLean House (It was Sunday, so the local Courthouse, barely a 100 yards away, was locked and no one had the keys). This is, in my opinion, Appomattox's '15 minutes of fame'. The site had been a overnight destination for stagecoaches going to Lynchburg, one day's ride away. But a couple years after the war, a railroad came through the area, and due to the local topography, the railroad ran about 3 miles away, where the current city of Appomattox is located. The historic area, now included in the Park, went by the wayside and every business and residence was abandoned in a very short period. Even a new courthouse, closer to the railroad was built. Appomattox was essentially abandoned, structures left in disrepair, and the site was largely forgotten until the 1890s.

Decades later, a privately-funded enterprise did remember the McLean house, and plans were made in the 1890's to disassemble the house, to be moved to D.C. for a proposed Civil War. But the economy turned bad, and the disassembled McLean house (wood, bricks) was left in a exposed pile, disassembled at the Appomattox site for over 40 years. And in 1892, the old courthouse burned down by fire and was left as-is.

By 1940, the National Park Service decided to restore the Appomattox site, but their plans were [again] interrupted, this time by WWII.

After the war, a significant effort was begun to restore the site, beginning with the McLean House. Some records from the 1890's provided some clues as to the size of the rooms and types of mouldings, but the only room well-documented was the 'Surrender Room'. And there were some some hand-written documents, drawings, and an assortment of pictures. The reconstruction of the McLean House took place from 1947-1949, including an archaeological dig, and the house was opened as the initial

structure of the park in 1950. Over the next 20 years, many other structures, including the old Courthouse, were either reconstructed, renovated, and rehabilitated. But there are quite a few other structures that were known to exist, but not current, that have not been reconstructed.

So we actually have (2) different Reconstructions at Appomattox: The McLean House, reconstructed as close as records permit, to how it would have looked inside and outside in in April 1865, AND the

old Appomattox Courthouse, rebuilt outside to reproduce how it looked at the same time frame, but the interior was turned into a visitor center and museum.

What I learned from this visit and from Alyssa Holland (Thesis) and the Appomattox Park Historian, is that Reconstruction is not an exact science. You do the best you do with what you have.

2.) Blackfriar Theatre, American Shakespeare Center (ASC), Staunton, VA

I visited Staunton, initially, to visit Western State Hospital, a former mental health state hospital, currently going MAJOR renovation and rehabilitation to become private residences, condos and apartments, but instead discovered the Blackfriar Theatre.

The Blackfriar Theatre is unique. Truly unique in the entire world. It is the ONLY Reconstruction of William Shakespeare's upper-class indoor theatre, which was lost during the 1650's English Civil War, a complete loss by demolition. (The Globe was an open-air theatre for the working classes, by the way).

The city offered the ASC a permanent home in 1999, and partially funded the construction of the Blackfriar. Grants and donations, large and small funded the rest.

But unlike most Reconstructions, the emphasis of Blackfriar is on the interior, since the ASC goal was to present Shakespeare's plays in the way of which they were written, cast, and then presented to the public hundreds of year ago. The theatre, which only sits 300, mostly on wooden benches, is surprising intimate and brightly light, and the stage quite small and up-close to the audience, who are often engaged by the actors. Only this type of Reconstruction can give the audience of what a patron of the Blackfriar might have experienced centuries before.

The Architect of the Blackfriar had a tough job. There are no pictures of either the interior or exterior of the theatre. The interior Reconstruction is based upon existing theatres of that time that do still exist, and rigorous research into the culture of this time and even to Shakespeare's hand-written notes to actors on how to enter and exist the stage and his directions to the actors.

The exterior of the building doesn't even really try to replicate what the Blackfriar may have looked like, since their focus was on interior experience and they had no information on the exterior structure.

The theatre operates 52 weeks of the year and is right at the entrance to the city limits and just 4 blocks from the train station (Amtrak runs trains to Staunton). And next to the Blackfriar is a large historical hotel.

The Blackfriar is a center for arts, culture, and commerce derived from tourism. Since the ASC opened the theatre in late 2002, tourism to Staunton has increased by 60%.

3.) All Hallows' Parish and Church, Edgewater MD (Near Davidsonville in Southern Anne Arundel)

All Hallows' Parish was founded in 1669, one of a set of 30 parishes in Maryland established by the

Anglican Church. The original congregation was 7 families with no church building. My visit was for family research, not historical preservation. The first Sellmans occupied this area in the 17th century and were members of the parish until 1919.

The parish church was finally built 60 years later and occupied in 1729 in the style and manner of an Anglican Church. The parish has the oldest working church bell from Colonial America, manufactured in England in 1727...

The church went through several interior renovations in the 1800's and was in continuous use since 1729.

But in 1940 a fire consumed the church, leaving little other than the partial brick walls of the structure. The picture of the burned-out church provided to me by the church archivist reminded me of Chestnut Lodge after the Jun 2009 fire.

They took a different path..

The congregation decided to Reconstruct the burned-out church as it would have looked in 1729, using their own money. Purely a privately-funded and operated effort. They made a few mistakes (wrong mortar for the old bricking), worked from sketches and other churches for the interior design, but the church was fully reconstructed back to its 1729 roots. There is no A/C and only a single fireplace at the back of the church for heat. They do have electrical lighting, though.

The church holds services every Sunday at 10:30 year round.

4.) Reconstruction comes in many ways and forms and the Standard for Reconstruction can be interpreted in many different ways, as these three examples describe.

5.) Are there any questions from the Mayor and Council?

1. Appomattox Court House National Historical Park, Southern Virginia

I made a 4- hour road trip from Rockville to Appomattox Courthouse National Historical Park the last week of March; just several weeks ago. April is an important year at Appomattox and the year especially important. This past April 9th is the 150th anniversary of a national historical event: The surrender of the the Army of Northern Virginia from General Lee to General Grant. Lee's army was surrounded, short on food, and badly outnumbered 6:1. When Lee realized the futility of the situation, he sent word to Grant asking to meet to discuss terms of surrender. Grant responded quickly, agreeing to the meeting and asked Lee for where they should meet. Lee's army just to the East of Appomattox, and just a few miles from the much larger Union Army surrounded it from the West, South, and also to the East, selected the small village of Appomattox. It was Sunday, so the local Courthouse was locked and no one had the keys. So Lee's staff decided the two generals would meet in a private residence, the McLean House, at that time the nicest private home in the town. The McLeans stayed upstairs in their house, while the military took over the McLeans main floor for the meeting. Lee arrived at 1:00; Grant at 1:30 and after a short introduction and personal discussion, Lee reminded Grant of the surrender. Grant wrote briefly, offering generous surrender terms which Lee agreed to. Lee left the McLean house and Grant shortly afterwards.

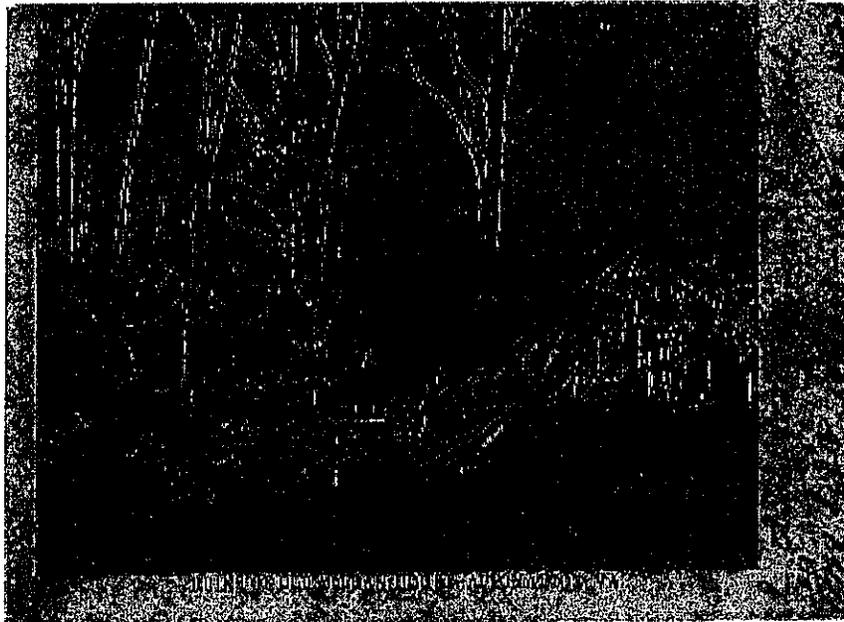
This is, in my opinion, Appomattox's *'15 minutes of fame'*.



McLean House (1947-1949 Reconstruction)

Appomattox had been a overnight destination for stagecoaches going to Lynchburg, one day's ride away. But a couple years after the war, a railroad came through the area, and due to the local topography, the railroad ran about 3 miles away from the , where the current city of Appomattox is located. The historic area 'Old Appomattox', now included in the Park, went by the wayside and every business and residence was abandoned in a very short period. Even a new courthouse, closer to the railroad was built, replacing the one near the Surrender site.. Old Appomattox was essentially abandoned, structures left in disrepair, and the site was largely forgotten and unused until the 1890s.

Decades later, a privately-funded enterprise did remember the McLean house, and plans were made in the 1890's to disassemble the house, to be moved to D.C. for a proposed Civil War. But the economy turned bad, and the disassembled McLean house (wood, bricks) was left in a exposed pile, disassembled at the Appomattox site for over 40 years. There were some crude drawings, and some hand-written notes on the structure and details of the house that were preserved.



And in 1892, the old courthouse burned down by fire and was left as-is.



Appomattox Court House after 1892 fire (left) and before (1890)

By 1940, the National Park Service decided to restore all the main buildings at the Appomattox site, but their plans were once again interrupted, this time by WWII. Most of the restoration research and work stopped in 1942.

After WWII, a significant effort was begun to restore the site, beginning with the McLean House. Some records from the 1890's provided some clues as to the size of the rooms and types of interior finishes and wood mouldings, but the only room well-documented was the 'Surrender Room', the McLeans living room. And there were some some 1890's hand-written documents and drawings saved, and an assortment of pictures plus about 5500 bricks remaining at the site, and an archaeological excavation of the site was performed

1
 MSS No. VA-240
 Page 6

Specifications

For moving and Rebuilding the McLean or
 "Surrender House" -
 from apparatus Court House to
 Washington D.C.

General

The House must be carefully taken
 down. All wood work numbered and
 removed so that pieces will be broken
 split or cut.

All doors, windows, mantels, etc. to be
 taken down and shipped in boxes
 as far as possible. Care being
 taken not to damage the paint or molding
 more than absolutely necessary.

The Board must be removed with great
 care so that the floor members will
 be broken. The corner and front bricks
 must be kept separate. If built back
 in their respective places, all of
 the bricks must be carefully placed.

Contract

The Contractor is to deliver all material
 on Cars at apparatus depot
 and cart all materials from
 Washington Depot to Building lot.
 The owners to pay all other freight
 charges.

Rebuilding

The accompanying drawings are to
 be considered as part of these
 specifications. The figures on drawings
 to have preference over scale measure

Sample page from the 1890's hand-written notes of McLean House disassembly

The only part of the McLean house that was undisturbed was the fireplace hearth in the basement, which was discovered untouched. The reconstruction of the McLean House took place from 1947-1949, including an archaeological dig, and the house was opened as the initial structure of the park in 1950.

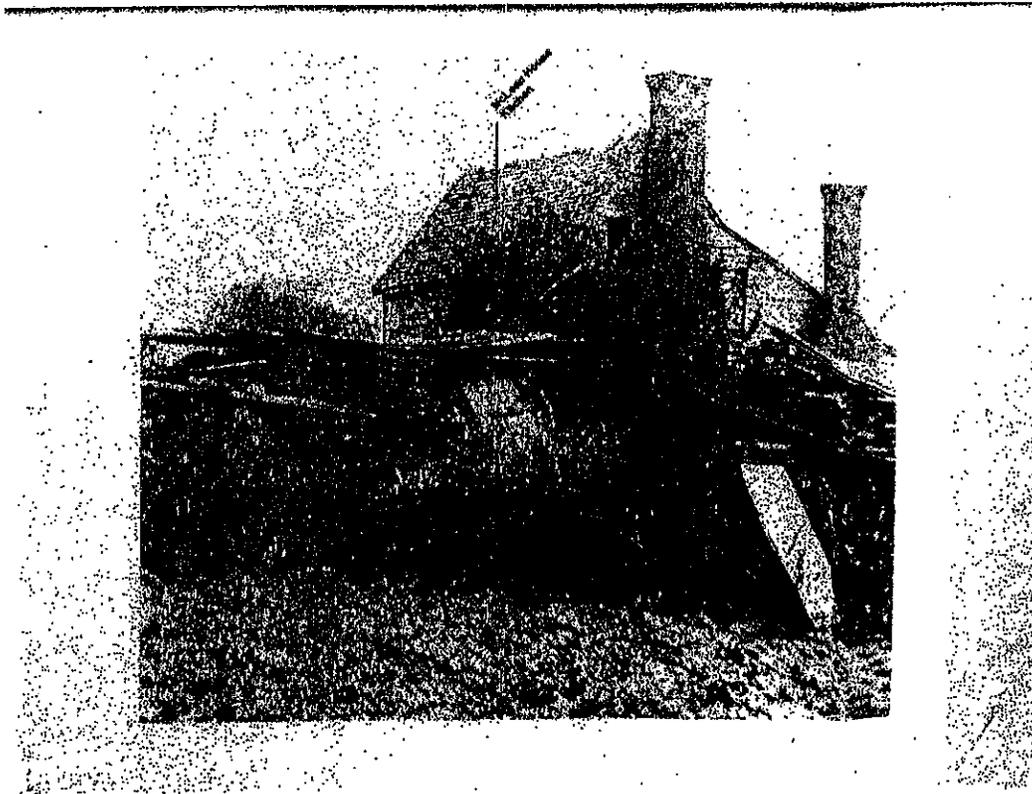


Archaeological Dig and Reconstruction of the McLean House

Over the next 20 years, many other structures, including the old Courthouse, were either reconstructed, renovated, and rehabilitated. But there are quite a few other structures that were known to exist at Appomattox, but unknown other than excavation, that have not been reconstructed.

So we actually have (2) different primary Reconstructions at Appomattox: The McLean House, reconstructed as close as records permit, to how it would have looked inside and outside in April 1865, AND the old Appomattox Courthouse, rebuilt outside to reproduce how it looked at the same time frame, but the interior was turned into a visitor center and museum.

What is most interesting is that in the 1960s, the Park Service decided to rebuild the McLean house kitchen, a separate structure at the back of the property. Their only direct evidence of its appearance is the photo below:



So the McLean Kitchen was also Reconstructed from the above picture, but also including a close examination of other surviving kitchens in the region and emulating their construction if they were of the same age and size. A lot of conjecture. So now there are at least (3) Reconstructions at Appomattox.

What I learned from this visit and from the two National Park Rangers I talked or corresponded with, Alyssa Holland (who wrote the Historical Reconstruction Thesis) and the Appomattox Park Historian, Patrick Schroeder, is that Reconstruction is not an exact science. You do the best you do with what you have.

END APPOMATTOX Written Testimony

2.) Blackfriar Theatre/American Shakespeare Center Staunton, VA

History: There were actually two Blackfriar theatres in London during the 16th and 17th centuries.

In 1596, James Burbage, father of the storied actor Richard from Shakespeare's own company, bought some property that had been a part of a friary. Though it lay within the walls of London, the land and building came with a "liberty," allowing it, in theory, to be used as a theatrical venue. Still, it took twelve years for Burbage's syndicate of investors, which included Shakespeare himself, to stage a play at Blackfriars Hall, which was also England's first indoor playhouse.

Smaller than the Globe, the more famous outdoor theater where Shakespeare's plays were performed, the Blackfriars was an upscale establishment that charged a premium for admission. In addition to protecting audiences from the vagaries of English weather, the Blackfriars could accommodate evening performances. Home of Elizabeth I's and then James I's favorite theater troupe, it was the place to be. "Gallants," writes Stephen Greenblatt in his book *Will in the World*, "eager to show off their clothes could even pay to sit on the Blackfriars stage and become part of the spectacle." The King's Men played in Blackfriars for the seven months in winter, and at the Globe during the summer. Blackfriars appears to have brought in a little over twice the revenue of the Globe; the shareholders could earn as much as £13 from a single performance, apart from what went to the actors.

The theatre closed at the onset of the English Civil War, and was demolished on 6 August 1655 .

The London Blackfriar theatre has survived only in English memory, which is to say court papers, probate records, and building plans for other theaters. There is no Reconstructed or Replicas of the Blackfriar in England.

Shakespeare in America

What is now called the American Shakespeare Center was formerly a traveling troupe of actors who performed Shakespeare's play

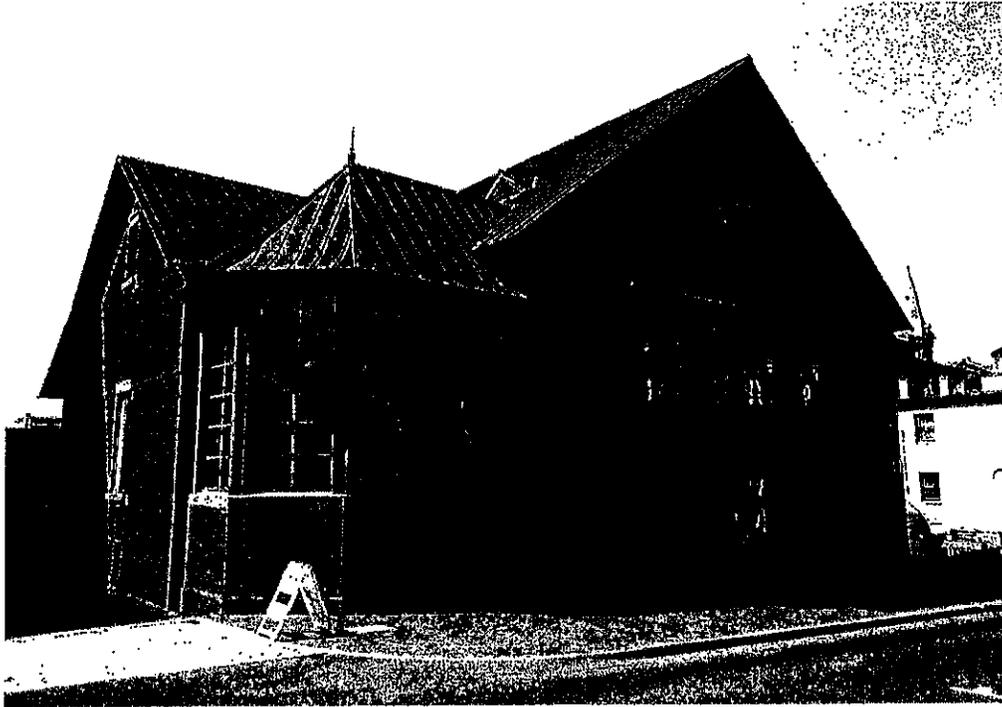
The Blackfriar Theatre is the ONLY Reconstruction of William Shakespeare's upper-class indoor theatre, which was lost during the 17th century English Civil War, demolished in 1655.

The city offered the ASC a permanent home in 1999, and partially funded the construction of the Blackfriar. Grants and donations, large and small funded the rest.

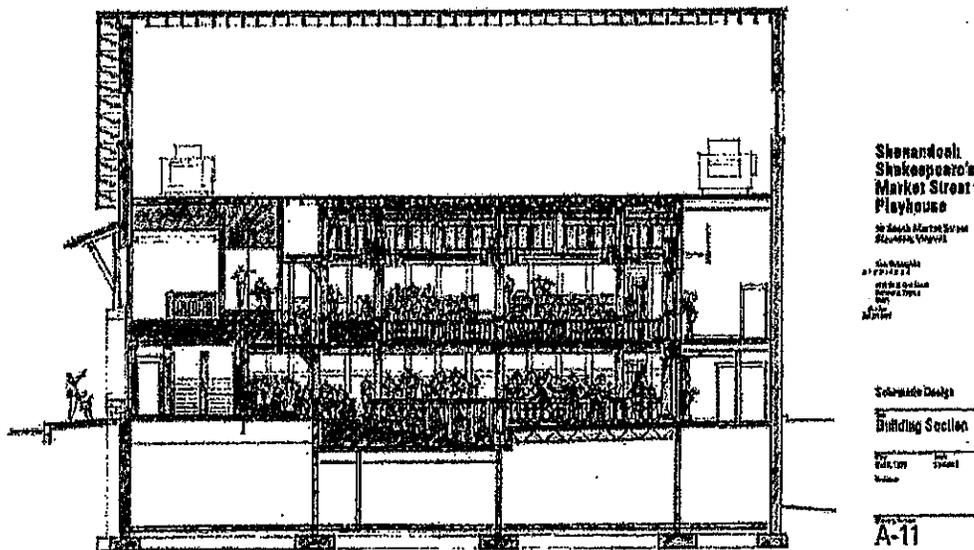
But unlike most Reconstructions, the emphasis of Blackfriar is on the interior, since the ASC goal was to present Shakespeare's plays in the way of which they were written, cast, and then presented to the public hundreds of year ago. The exterior pretends to be neither as old as the other buildings in Staunton nor jarringly modern. Of course, there are no drawings, sketches of the London Blackfriar to work from. However, the interior of the theatre, which only sits 300, mostly on wooden benches, is surprising intimate and brightly light, and the stage quite small and up-close to the audience, who are often engaged by the actors. Only this type of Reconstruction can give the audience of what a patron

of the Blackfriar might have experienced centuries before.

The Architect of the Blackfriar had a tough job. There are no pictures of either the interior or exterior of the theatre. The interior Reconstruction is based upon existing theatres of that time that do still exist, and rigorous research into the culture of this time and even to Shakespeare's hand-written notes to actors on how to enter and exist the stage and his directions to the actors.



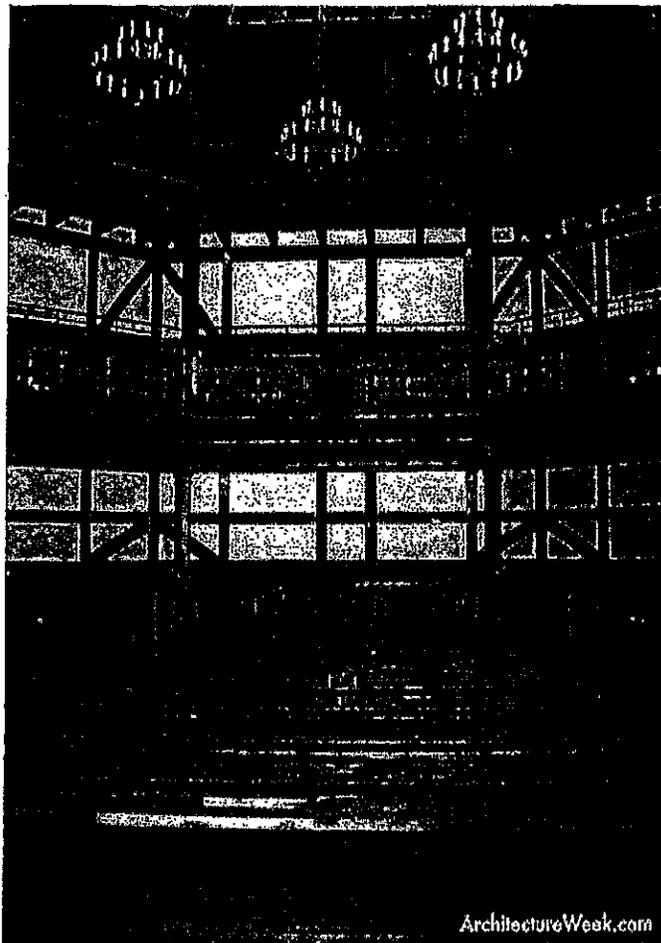
Exterior of the Blackfriar Theatre, Staunton, VA



Interior Cross-Section of the Blackfriar Theatre, Staunton, VA



The stage of the Blackfriar Theatre, Staunton, VA



From the stage to the back of the Blackfriar Theatre, Staunton, VA



'The Taming of the Shrew', Blackfriar Theatre Staunton, VA



The Blackfriar theatre operates 52 weeks of the year and is right at the entrance to the city limits and just 4 blocks from the train station (Amtrak runs trains to Staunton). And next to the Blackfriar is a large historical hotel, the Stonewall Jackson. Parking, shopping, and restaurants are all closely located to each other.

The Blackfriar is a center for arts, culture, and commerce in Staunton, which greatly benefits from tourism. People will make trips to Staunton to attend plays at the Blackfriar from all over the state. Since the ASC opened the theatre in late 2001, tourism to Staunton has increased by 60%, although not purely due to the Blackfriar's presence.

End Written Testimony – Blackfriar Theatre

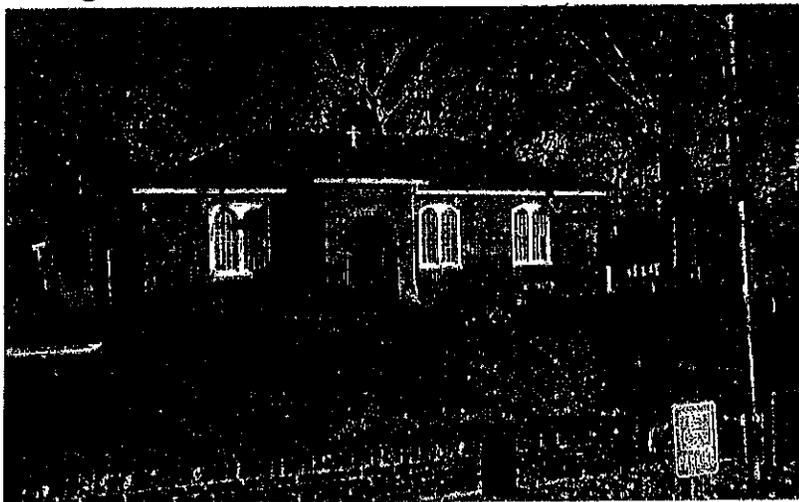
Part 2 Written Testimony Sellman

3.) All Hallows' Parish and Church, Edgewater, MD – near South River and Davidsonville, MD

All Hallows' Parish was founded in 1669, one of a set of 30 parishes in Maryland established by the Anglican Church. The original congregation was 7 families with no church building. My visit was for family research, not historical preservation. The first Sellman had moved to the area in 1659 as a 13-year-old indentured servant.



The parish church was finally built 60 years later and occupied in 1729 in the style and manner of an Anglican Church. The church went through several interior renovations in the 1800's and was in continuous use during the 18th and 19th centuries.



All Hallows' Church, December 2015

But in 1940 a fire consumed the church, leaving little other than the partial brick walls of the structure and the surviving church bell, housed in an outside structure. The picture of the burned-out church provided to me by the church archivist reminded me of Chestnut Lodge after the Jun 2009 fire.



They took a different path..Reconstruction

The congregation decided to Reconstruct the burned-out church as it would have looked in 1729, using their own money. Purely a privately-funded and operated effort. They made a few mistakes (wrong mortar for the old bricking), worked from sketches and other churches for the interior design, but the church was fully reconstructed back to its 1729 roots. Currently, there is no A/C and only a single fireplace at the back of the church for heat. They do have electrical lighting, though.



All Hallows' – Reconstructed Exterior (picture taken Dec 2015)



All Hallows' – Reconstructed Interior (picture taken Dec 2015)

The church still holds services every Sunday at 10:30 year-round.

Last note on All Hallows': The church possesses, and still uses, the oldest working church bell from Colonial America. It is housed in a separate structure to the left of the church. It still rings beautifully.



End written testimony – Andrew Sellman

RECEIVED
APR 20 2016
COMMUNITY PLANNING
AND DEVELOPMENT SERVICES

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Thursday, April 21, 2016 8:56 AM
To: Nancy Pickard; mayorcouncil
Subject: RE: Peerless Rockville Statement on Chestnut Lodge PRU Amendment

Ms. Piccard,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Nancy Pickard [mailto:director@peerlessrockville.org]
Sent: Wednesday, April 20, 2016 5:48 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Peerless Rockville Statement on Chestnut Lodge PRU Amendment

Greetings Mayor Donnell Newton and members of the Council,

Please review and add the attached letter from Peerless Rockville, regarding the significance of Chestnut Lodge, to the public record for the hearing on April 25, 2016. The letter outlines our concerns with the proposed amendment to PRU 2005-00022, which was developed and adopted to guide development of this significant landmark property.

Thank you,

Nancy

Nancy Pickard
Executive Director
Peerless Rockville
P.O. Box 4262, Rockville, MD 20849-4262
301-762-0096
director@peerlessrockville.org

Mayor and Council
111 Maryland Avenue
Rockville, MD 20850

April 20, 2016

Dear Mayor and Council,

Chestnut Lodge is of great historical significance to the City of Rockville as the former site of the 19th-century luxury Woodlawn hotel and a 20th-century world-renowned psychiatric facility. As a City supported nonprofit with a mission to preserve and protect the history and heritage of Rockville and owners of Frieda's Cottage at 19 Thomas Street, Peerless Rockville calls for careful examination of the proposal to amend PRU 2005-00022. The PRU (2006) and Chestnut Lodge Design Guidelines (2004) were crafted with the intent of preserving this historic landscape. However, both of these documents are silent on what to do in the event of a catastrophic loss of the Lodge. Peerless Rockville encourages Mayor and Council to deny this amendment with the understanding that the absence of clear guidelines gives the City of Rockville the opportunity to step back and consider the best possible outcome for this unique, small but highly visible parcel.

While the PRU allowed for the creation of seven condominium units on this parcel, this allowance was predicated on the rehabilitation and adaptive re-use of the historic lodge itself, which sadly, consumption by fire has rendered impossible. Conformance with the original PRU resolution and carefully crafted and adopted Chestnut Lodge Design Guidelines should guide development of the historic site. We question if the proposal by JNP Chestnut Lodge, LLC for the construction of seven townhouse units at 500 West Montgomery Avenue, is in keeping with the original spirit and intent of the PRU and takes into account the best historic preservation practices for the significant history of the site and its associated land use. New construction and the introduction of seven townhouse units threatens to diminish the historical integrity of the entire Chestnut Lodge campus, including its:

- place within the West Montgomery Historic District
- historical associations with a bygone time
- institutional land use designation
- orientation to and treed viewshed from West Montgomery Avenue
- prominent siting on what was and continues to be a primary thoroughfare, into and out of, the City center
- overall significance as a landmark historic landscape in Rockville

Site Significance

In 1890, when Rockville was an up and coming haven for urban residents looking to escape the City, and the B&O Railroad was attracting speculative developers to purchase land for elaborate Victorian home sites, visitors stayed at the grand Woodlawn Hotel. The Second Empire brick structure fronted West Montgomery Avenue, a main thoroughfare, its prominence punctuated by a deep setback and expansive parklike lawn. Although economic depression caused its life as a hotel to be short-lived, the parcel's next owner Dr. Ernest Bullard appreciated the value and beauty of the site when he chose Woodlawn Hotel as the ideal location for his private mental health sanitarium. As both a hotel and as a sanitarium/hospital Chestnut Lodge has functioned as a unified campus, housing guests, patients, medical professionals and other caregivers for over 100 years.

Throughout its long life, the architecturally dominant hotel stood as an iconic feature on the West Montgomery Avenue landscape. The property expanded into a modern medical campus, locally, regionally and nationally sanctioned as a leading medical institution, for the care and treatment of psychiatric disorders, but always retained the prominent hotel as its visual anchor. The striking rooflines and vertical tower features, along with other significant period details endeared it to residents as a unique landmark property, dually cited as significant in the City of Rockville both architecturally, as the last remaining hotel site from Rockville's resort era, and for its historical associations with advancements in the field of psychoanalysis.

The history of this site is intertwined inexorably with Rockville's history and the development of the City over the past century. Its origin as Woodlawn Hotel coincides with Rockville's late 19th century identity as a countryside vacation getaway for Washingtonians. The name Chestnut Lodge and the transformation into a sanitarium occurred at a time when health and wellness were associated with spas and relaxation as much as medicine and science. Chestnut Lodge was established in Rockville in part due to its proximity to the Capital, to provide mental healthcare to a population whose links to the federal workforce provided both economic and education levels more able and willing to undergo psychiatric care if needed. As Rockville transitioned into a large, modern city, the medicine practiced at Chestnut Lodge also evolved and influenced national and international understanding of psychiatric care.

Historic Preservation Treatments

The importance of the 20-plus-acre site as an institutional campus and a prominent historical landscape has been repeatedly affirmed in Rockville City planning documents to include the 2002 Land Use Plan, the 2002 Master Plan, the 2004 Chestnut Lodge Design Guidelines and the 2006 PRU. Its historical and associative value has also been recognized by Montgomery County, the Maryland Historical Trust and the National Register as a contributing resource in the West Montgomery Avenue Historic District, of which it is a significant part.

Application of the appropriate historic preservation treatment should guide development of this site. According to the Secretary of the Interior's Standards for the Treatment of Historic Properties, there are four treatment approaches to a historic property or landscape listed in hierarchical order: preservation, rehabilitation, restoration, and reconstruction.

- Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property.
- Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.
- Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.
- Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

The Secretary's Standards for Preservation call for maximizing the retention of distinctive features, spaces, and spatial relationships. Peerless Rockville asserts that despite the absence of the main lodge, the property survives as an important historical landscape, which includes a visual presence along West Montgomery Avenue, Frieda's Cottage, Rose Hill Barn, Little Lodge, and the Ice House, and retains significant circular access patterns. Therefore, the landscape has integrity and remains significant.

With the loss of the main lodge, preservation, rehabilitation, and restoration of the structure are no longer options. As discussed, much of the historic campus landscape is intact, and thus can and should be preserved, rehabilitated, or restored. Because reconstruction depicts vanished or non-surviving portions of a property, it should be given consideration as a valid treatment. Reconstruction may be possible, despite the absence of documentation of the lost structure in the form of HABS records or measured architectural drawings.

We note that reconstruction should be undertaken only after considerable study to determine if documentary and physical evidence is available to permit accurate reconstruction and such reconstruction is essential to the public understanding of the property. As indicated by the Secretary of the Interior, this choice must avoid conjecture of unknown pieces, identify the time period to which it will be reconstructed, and clearly identify the building as a recreation.

Adopted Chestnut Lodge Preservation Guidelines

Preservation of the historic Chestnut Lodge landscape was central to the 2004 Chestnut Lodge Design Guidelines, which are in place to guide the development of this site, as well as the 2006 PRU that the proposal before you seeks to amend. The guidelines directed preservation of the hotel building as the dominant architectural feature, around which the spatial relationships of other buildings, open areas, and roadways and pathways had been and should continue to be placed. It further describes these networks as integral to understanding the site's historical development.

In the spirit of preservation, the 2004 guidelines included goals to:

- Preserve and protect the existing character of the historic districts, including both the natural and built environments
- Provide guidance for rehabilitation and alteration, and discourage the introduction of incompatible features
- Protect the architectural heritage, established character, and value of the West Montgomery Avenue Historic District

We ask that the Mayor and Council consider if the current amendment meets the above stated goals in regards to the character, environmental setting, and compatibility with the architectural heritage of the West Montgomery Historic District.

New Construction

While the design guidelines allow for new construction, any new construction on this site must follow Maryland Land Use Article §8-304, which states that Historic District Commissions may strictly judge new construction if it would seriously impair the historic or architectural significance of the surrounding site. This is indeed the case at Chestnut Lodge, where the space in question was the central location around which the surrounding campus evolved, both as a hotel and hospital, and was respected when Chestnut Lodge community was planned and developed in 2006.

Peerless calls attention to Section 6.4 A of the 2004 Guidelines, which discourages the construction of new buildings within the West Montgomery Avenue Historic District. However, section 6.4 C states that if construction does occur within the historic district, it must harmonize and be compatible with the character of the existing historic district and the character of existing structures in terms of massing, size, scale, materials and architectural design, while maintaining an appropriate environmental setting.

To maintain the character of the historic landscape, it appears clear, that the City can choose to leave the site in an open parklike state or, alternately, allow construction of a singular, dominant building that serves as the primary focus of the site. Any new construction would be subject to strict limitations to be compatible to the earlier hotel in massing, size, scale, materials and design, maintain the public viewsheds from West Montgomery Avenue and Thomas Street, and preserve the existing open areas, roadways, and pathways in a way that is consistent with the sites historic development.

Although Rockville's Historic District Commission has provided feedback to the applicant on architectural features, they have not been asked for a recommendation on the overall appropriateness of the proposed townhomes at the site of Chestnut Lodge. Peerless Rockville believes that the HDC has a duty to address this question as their objective is to foster and safeguard the heritage of the community by preserving the historic districts therein. The HDC has been informed that portions of the Chestnut Lodge Design Guidelines no longer apply due to

the destruction of the main lodge; Peerless Rockville contends that all sections of this document remain applicable and in effect until changed by this body. The Chestnut Lodge Design Guidelines represent the City's deep concern for and commitment to the best preservation practices at this site, a mission which remains paramount even more so after the tragic loss of the lodge while under the management of the previous owner.

Project Plan Application

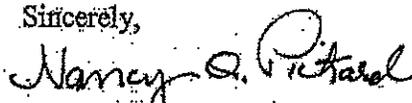
While the proposed design pays homage to the architectural features of the hotel, it fails to deliver a unified structure with four facades equally treated to respect the scale, massing and dominant character of the iconic main lodge. The proposed amendment to the PRU does not honor the intention and spirit of the original PRU as the introduction of individually accessed townhomes on the site is inconsistent with the historical development, character and architectural heritage of the West Montgomery Avenue Historic District. This is particularly evident on the west elevation where individual parking garages and decks introduce features that are not historically appropriate for the period of development. Additionally, at 32% larger, and 35 feet longer, the proposed construction stretches horizontally on the landscape and does not maintain the strong vertical mass of the earlier hotel.

Conclusion

Peerless Rockville encourages the Mayor and Council to carefully consider the significant history of the site, its prominent role in the development of this community and the full future ramifications of development on this small but significant parcel. With the dominant structure no longer standing, the community has an expectation that proposed new development will conform to the intention of the original guidelines and resolution, be respectful in preserving the significance of the site, and not introduce features that are incongruent with its historic use and associations. New construction on this parcel, particularly the introduction of townhouse units, will forever alter the historic Chestnut Lodge landscape as well as the protected views from West Montgomery Avenue and Thomas Street.

We call on Mayor and Council to preserve and add interpretation of the existing the landscape or to hold the developers to a high standard, befitting the unique status of this signature property, challenging them to design a structure of singular design, of a size and massing that embodies the spirit of the iconic hotel, the historic landscape, and respects the historic viewsheds to and from West Montgomery Avenue. Lastly, in addition to thoughtful development on the parcel, this site calls out to be properly interpreted to better educate and inform visitors to the story of its past. Peerless Rockville encourages you to require a full plan for interpretive elements and signage as a condition of any new construction on the site.

Sincerely,



Nancy Pickard
Executive Director

**Testimony of Patricia Woodward
Regarding
Historic Chestnut Lodge**

016 APR 21 AM 10:53
TY 016 APR 21 AM 10:53

The vision of Dr. Ernest M. Bullard to purchase the closed Woodlawn Hotel in 1908 and to re-open it after renovations in 1910, was to create the Chestnut Lodge Sanitarium as a psychiatric facility. This was a sentinel event. The vision continued in the late 1920's when the elder son, Dr. Dexter M. Bullard, and his wife Anne came "on Board." By 1931 there were 22 patients, and the hospital was beginning to expand with patient facilities and housing as needed. The number of in and outpatients were growing as was the focus on psychiatric training and research.

The next sentinel event was Dr. Dexter Bullard persuading Dr. Frieda Fromm-Reichmann, a world-renowned psychoanalyst, to come to Chestnut Lodge in 1935 from Germany. She remained on the staff of the hospital and resided on the campus until her death in 1957. She led the staff in focusing on Interpersonal and Social Aspects of psychiatry as well as developmental impacts on personality. Simply put, she placed emphasis on the patients' early life experiences that interrupted their ability to understand themselves and the world around them. Her written theories and techniques, "Principles

Community Mental Health Center in the nation sponsored by a private psychiatric hospital. Dr. Gibson established an adolescent unit that featured an accredited school for students.

Chestnut Lodge served mental health patients through the 90 year period. Chestnut Lodge became one of the most notable mental health institutions in the world. Literally thousands of scholarly articles reference the Lodge and its doctors, and the research and treatments developed there. Research at the Lodge went on under direction by such notables Dr. John Cameron. The endowments of the Ford Foundation certainly enabled these findings in this cradle of psychoanalysis. The institutions that were enhanced were the Menninger Clinic, Kansas, Sheppard Pratt, Maryland, Austen Riggs Center, Mass., where the notable Dr. Otto Will became Medical Director. For example, US News and World Report magazine published an issue of America's best hospitals. The work was done by National Opinion Research Center, University of Chicago. Chestnut Lodge had been ranked in the top tier at least twice: 1994 and 1996 for psychiatry.

The closure of the Lodge in 2000 may have been a physical one. However, the work and the research and the findings continue. For example, ISPS (the international society for the psychological treatments of the

**Testimony of Patricia Woodward
Regarding
Historic Chestnut Lodge**

016 APR 21 AM 10:53
TY 00000000

The vision of Dr. Ernest M. Bullard to purchase the closed Woodlawn Hotel in 1908 and to re-open it after renovations in 1910, was to create the Chestnut Lodge Sanitarium as a psychiatric facility. This was a sentinel event. The vision continued in the late 1920's when the elder son, Dr. Dexter M. Bullard, and his wife Anne came "on Board." By 1931 there were 22 patients, and the hospital was beginning to expand with patient facilities and housing as needed. The number of in and outpatients were growing as was the focus on psychiatric training and research.

The next sentinel event was Dr. Dexter Bullard persuading Dr. Frieda Fromm-Reichmann, a world-renowned psychoanalyst, to come to Chestnut Lodge in 1935 from Germany. She remained on the staff of the hospital and resided on the campus until her death in 1957. She led the staff in focusing on Interpersonal and Social Aspects of psychiatry as well as developmental impacts on personality. Simply put, she placed emphasis on the patients' early life experiences that interrupted their ability to understand themselves and the world around them. Her written theories and techniques, "Principles

of Intensive Psychotherapy, 1950" are still to this day the most fundamental texts on the subject.

She, with Dr. David Rioch, co-founded the William Alanson White Institute in New York. Dr. Rioch was appointed the first chairman and professor of Neuro-Psychiatry at Washington University School of Medicine. Dr. Harry Stack Sullivan, founder of the Washington School of Psychiatry, was head of this institution from 1936-47, and worked in conjunction with Dr. Frieda Fromm-Reichmann's prolific publishing works on conceptions of modern psychiatry. Notable Drs. Harold Searles and Robert Morris were on staff prior to going to the Menninger Clinic.

Dr. Robert Cohen joined the Chestnut Lodge staff in 1946 and became clinical director. He founded a clinical research program at the N.I.M.H. He was a training and supervising psychoanalyst for the Washington Psychoanalytic Institute from 1950-83. In 1980 Dr. Cohen was asked by the State Department to perform psychological evaluations of the hostages in Iran before their release. Dr. Cohen returned to the Lodge in 1981 as Director of Psychotherapy and retired in 1991. Dr. Robert Gibson was on staff at the Lodge from 1952-62. In 1962, he became clinical director and in 1963 medical director at Sheppard Pratt. He developed the first Public

Community Mental Health Center in the nation sponsored by a private psychiatric hospital. Dr. Gibson established an adolescent unit that featured an accredited school for students.

Chestnut Lodge served mental health patients through the 90 year period. Chestnut Lodge became one of the most notable mental health institutions in the world. Literally thousands of scholarly articles reference the Lodge and its doctors, and the research and treatments developed there. Research at the Lodge went on under direction by such notables Dr. John Cameron. The endowments of the Ford Foundation certainly enabled these findings in this cradle of psychoanalysis. The institutions that were enhanced were the Menninger Clinic, Kansas, Sheppard Pratt, Maryland, Austen Riggs Center, Mass., where the notable Dr. Otto Will became Medical Director. For example, US News and World Report magazine published an issue of America's best hospitals. The work was done by National Opinion Research Center, University of Chicago. Chestnut Lodge had been ranked in the top tier at least twice: 1994 and 1996 for psychiatry.

The closure of the Lodge in 2000 may have been a physical one. However, the work and the research and the findings continue. For example, ISPS (the international society for the psychological treatments of the

schizophrenias and other psychoses, the United States chapter) held the tenth annual meeting October 2-4, 2009 at the Red Brick Courthouse, Rockville, Md. The keynote speaker was Dr. John S. Kafka. His address title was: "Harvesting today the fruits of Chestnut Lodge." One of the hosts was Peerless Rockville. Part of the program event stated that the Lodge was a beacon for the psychodynamic treatment of severe mental illness. The Lodge was located an easy walk from our site of the meeting.

The Lodge's main building, which sadly burned down in June, was the site of Joanne Greenberg, autobiographic novel, "I never Promised you a Rose Garden." The home and office of her famous therapist, Dr. Frieda Fromm-Reichmann, who wrote and taught the "Principles of Intensive Psychotherapy," will be open for visitation.

Through the work of the Lodge's staff members and others, the evolving of the pioneering humanistic treatment programs inspire others to develop their own unique approaches to treating mental illness today and tomorrow.

Nicole Walters

From: janeereagan@comcast.net
Sent: Friday, April 22, 2016 7:31 AM
To: Nicole Walters
Subject: no townhouses Chestnut Lodge

Hi Ms Walters,

Per our conversation 4/20/16, I live in the West End neighborhood (555 Anderson Avenue), and would like to voice my opinion that there should not be townhouses, in any form, built in this beautiful historic neighborhood. They just do not belong here. Please let me know if I can be of any further assistance in this matter.

Regards,

Jane E. Reagan
301-651-2677

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 8:30 AM
To: Shaw Feng; mayorcouncil
Subject: RE: Chestnut Lodge

Mr. and Mrs. Feng,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Shaw Feng [mailto:sfeng2000@gmail.com]
Sent: Friday, April 22, 2016 6:13 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Chestnut Lodge

Dear Mayor and Council Members:

The proposed plan for building townhouses concerns me. The footprint is larger than the approved renovation, the plan does not fit the original Chestnut Lodge, and construction will have negative impacts on historical site of Rockville and Henson Oaks Lane in many environmental aspects. We are not in favor of the plan as submitted.

Sincerely,
Shaw C. and Sheauline Y. Feng

Citizens of the City of Rockville - West Montgomery Avenue/Henson Oaks Lane

164
Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 8:29 AM
To: Jeanne Omeara; mayorcouncil
Subject: RE: Chestnut Lodge Mayor and council meeting on monday april 25th comment submission

Ms. Omeara,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Jeanne Omeara [mailto:jeanne.omeara1@gmail.com]
Sent: Saturday, April 23, 2016 1:05 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Chestnut Lodge Mayor and council meeting on monday april 25th comment submission

Mayor and Council:
April 25, 2016

I will keep this brief BUT I also wanted to add my own words.

Letters from the Developer would like everyone to believe they are keeping in line with the prior approve multi-dwelling of 6-7 Condo units. This is **extremely misleading**.

We have to stop here and review what WAS approved. The city, planners, community found the BEST way to utilize a Beautiful Historic Building.

We the Citizens of Rockville wanted keep the Heritage, History and Beauty of Chestnut Lodge and bring this showpiece back to life for the city. The **BEST** use of **THAT** building in **that** space was to restore it to all its former beauty and have multi-dwellings in the form of luxury condos with HIDDEN parking underneath.

This would have been the showpiece of Rockville had it not been burned to the ground.

I was also disappointed that the prior developer even ~~ATTACHED~~ down did not see it thru. As we all know it would have been cheaper for him to have rebuilt the "Chestnut Lodge" from scratch then to restore it.

SO let's take this minute to remember, that we all approved THE BEST USE FOR THAT HISTORIC PROPERTY IN A HISTORIC DISTRICT. Condos/Townhomes alone would NEVER have been considered appropriate let alone would have been approved if there was no Historic Building to restore.

The very notion that the city is entertaining approving townhomes in this location is disappointing. **We have to remove from our minds any prior notion that this multi-dwelling issues was already reviewed.** AGAIN WHAT WAS APPROVED WAS THE BEST USE FOR A RESTORATION OF A HISTORIC LANDMARK IN OUR COMMUNITY!

I would support this current builder to pick up where the prior builder left off and rebuilt the Chestnut Lodge building just as Morty proposed so very long ago. I've done research and there is precedent for this....to rebuilt historic buildings, Andrew Sellmen can supply you with this data.

The West Montgomery Aveue Historic District will never be able to undo the disastrous discson if townhomes are allowed to be built on that property. 5 years from now, we will all be asking ourselves what we were thinking. This is a historic District of SINGLE FAMLY HOMES. Bethesda magazine just last month highlighted Historic West End as top 30 places to live in the area.

AND That is the way it should stay. There is no shortage of Townhomes in Rockville, so there is no argument this is a needed development.

Please consider this development carefully as we will not be able to unring this bell once it is done.

I urge the Planning commission and the Mayor and the Council to do the right thing – We all know that any multi-dwelling units are inappropriate in this space and would not even have been able to progress to this state had there not been the Historic Chestnut Lodge tragedy...Let's not make another one by allowing approval.

Jeanne O'Meara/Historic Homeowner: 419 west Montgomery Ave
Prior Peerless Rockville Board member

Jeanne O'Meara
Mobile: 571-217-5242
Jeanne.omeara1@gmail.com

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 9:15 AM
To: Peggy Deitrick; mayorcouncil
Subject: RE: No to Townhouses

Ms. Deitrick,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

-----Original Message-----

From: Peggy Deitrick [mailto:peggydeitrick@icloud.com]
Sent: Monday, April 25, 2016 9:07 AM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: No to Townhouses

April 25, 2016

Dear Mayor and Council -

I strongly urge you to deny the permit for the proposed townhouses at Chestnut Lodge. To allow townhouses to be built on this property would violate the original proposed plan that the city has already approved. The plan to save and renovate the original building, I feel, was a compromise for allowing the development of the property. Saving the old hospital was a way of preserving the character of the historic district. Sadly this last piece of history was totally lost to a fire. If the former owner/developer had been required to secure the building maybe we would be having a conversation about the building but that's a different narrative all together. As a lifelong resident of Rockville, who has watched my hometown become hardly recognizable for all the development, I urge you to deny this request. Thank you for your consideration.

Sincerely ,

Peggy Deitrick
714 Brent Rd.

168

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 12:34 PM
To: Kate Ostell; mayorcouncil
Subject: RE: PJT2015-00005

Ms. Ostell,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Kate Ostell [mailto:kateostell@gmail.com]
Sent: Monday, April 25, 2016 11:49 AM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: PJT2015-00005

Please accept the attached file as testimony for the Public Hearing on April 25, 2016.

Thanks,
Kate Ostell

To: Mayor and Council, City of Rockville

From: Kate Ostell, Rockville, MD 20850

Re: Project Plan Amendment PJT2015-00005

April 25, 2016

Before it was destroyed, the Main building at Chestnut Lodge Hospital, formerly the Woodlawn Hotel, was one of the most important historic buildings in Rockville. The hospital was nationally and internationally famous, holding a unique place in the history of American psychiatry. The approved PRU development on the site was designed as a whole, specifically to honor this history. The Main building was to have been the centerpiece of the development and of the Chestnut Lodge Historic District. It was what gave the surrounding historic buildings context, including the Freida Fromm-Reichmann Cottage in which Peerless Rockville made a substantial investment.

The Project Plan Amendment before you is not in accordance with the Master Plan. It is attempting to treat a 1.68 acre parcel of the entire PRU on it's own and out of context of the whole. The Comprehensive Master Plan, which labeled this 20.43 acre site "Critical Parcel/Area #1", states "...preservation of the historic buildings and the site's mature trees ... are key concerns." It also states that "A residential use on the property may be acceptable if the historic buildings and trees are protected." The prior owner got the residential use, but did not fulfill his obligation regarding all the historic resources. The Main Building was not adequately protected from intruders and was destroyed by fire in 2009.

The Master Plan also states that "The governing minimum lot size, maximum lot coverage and minimum setback requirements that apply to the property shall be those of the R-90 Zone in order that the new development be compatible with existing surrounding neighborhoods." However, the City allowed the prior developer to squeeze these standards in significant ways to enhance the financial viability of the project and to ensure he could afford to stabilize and renovate the Main Building. For instance, to achieve the mandatory minimum lot size of 9000 sq ft, the sidewalks and tree lawn areas were allowed to be included in the lots to increase their size, which is not the case in surrounding R-90 neighborhoods. Without this provision, the vast majority of the new lots would be less than the required 9000 sq ft.. Many setbacks were narrowed and exceptions made for placement and heights of accessory structures. Also, unlike other PRU's there was no public park provided, instead there was to be the preserved historic district.

When the original PRU agreement was being negotiated, there is no way that a stick of townhouses oriented sideways to W. Montgomery Ave. and with highly visible surface parking would have been allowed on this site. Even if the Main Building had already been destroyed by the time of the PRU drafting, there would have been zero appetite for a plan remotely like the one before you. Townhouses were not considered appropriate anywhere in this PRU, certainly not in the historic district, and certainly not configured in this way. There are no townhouses in the Historic District nor anywhere on W. Montgomery Ave.. This application does not even respect the original orientation of the Main building, putting the rear of the structure facing west, which was the side of the original building. All other houses in the Historic District and on W. Montgomery Ave. face the street, as did the Main building. A view of the backs of the proposed townhouses, surface parking, garbage cans etc. will be easily seen from W. Montgomery Ave. as well as from the surrounding houses, some of which are in the W. Montgomery Historic District. While there is a small tower that is intended to mimic a feature of the Main building, there is little resemblance to the historic original. The proposed building has a substantially larger

footprint than that of the Main building and the massing is quite different. Thus I question whether this proposal meets the HDC Design Guidelines for new construction at Chestnut Lodge, which apply here. Just because the Main Building was destroyed does not mean the City should dismiss the historic nature of this property. There was never an intention for the PRU to be taken as separate parts. All the trade offs made for the rest of the development, which were to ensure the preservation of the Main Building, have been given. The relaxing of development standards for the new houses was considered a worthwhile trade off to preserve the highly valued historic resources and the iconic view shed from W. Montgomery Ave.. The new owner must live up to the obligations for this parcel which, in addition to allowing 7 residences, includes honoring the history of the site.

Since the historic Main building was to have been the focus of a carefully planned development, it now would be most appropriate that any new building should be substantially the same in style, mass, scale, character and materials as the original. Ideally it would be a reconstruction. There is precedent for reconstruction on the Lodge site. The Stable was demolished and rebuilt. The Ice House had deteriorated almost to rubble and was rebuilt. So it should it be with the Main Building, the most important building of all and the one that gave context to the rest. The intent and integrity of the approved PRU should be upheld and the history of the site respected. Please do not allow a sideways stick of townhouses in the Chestnut Lodge Historic District and on the site of one of the most treasured historic buildings in the City. Please recommend denial of Project Plan Amendment PJT2015-00005.

Thank you for your consideration,

Kate Ostell

Member of the City of Rockville Planning Commission when the Chestnut Lodge PRU was approved

Former Medical Staff member, Chestnut Lodge Hospital

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 3:36 PM
To: Eileen McGuckian; cityclerk
Subject: RE: Testimony for Mayor & Council public hearing public records, on Chestnut Lodge, April 25, 2016

Ms. McGuckian,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

-----Original Message-----

From: Eileen McGuckian [mailto:phileen3@verizon.net]
Sent: Monday, April 25, 2016 3:24 PM
To: cityclerk <cityclerk@rockvillemd.gov>
Subject: Testimony for Mayor & Council public hearing public records, on Chestnut Lodge, April 25, 2016

Dear City Clerk,

Attached is my testimony submitted for the record of the Mayor & Council's public hearing this evening on Chestnut Lodge.

Thank you very much,

Eileen McGuckian

**Project Plan Application PJT2015-0005 ATTACHMENT C
Testimony to Mayor and Council of Rockville, April 25, 2016**

Eileen McGuckian, 11807 Dinwiddie Drive, Rockville, MD 20852 phileen3@verizon.net

I discovered Chestnut Lodge 50 years ago this month when I moved to Roxboro Road and soon learned that Chestnut Lodge was unique for being the last resort hotel in Rockville and as an internationally respected institution. Later I got to know three generations of Bullards and helped gain protection through designation in the West Montgomery Avenue Historic District and the National Register of Historic Places.

In the 1990s, as the Bullards sold land for new subdivisions and the sanitarium closed, its aura was maintained by the entrance, lawns, roads, and historic buildings. Two successor institutions to Chestnut Lodge could not make the property work for them, and the final 20 acres were sold in 2005 to a residential developer. I am glad the City required preserving the treed lawn and view from West Montgomery and re-use of the stately administration building. Although CLP was caught in a recession, as had been the hotel a century earlier, this became a fine neighborhood of single-family homes, Frieda's Cottage and Little Lodge were restored, and the ice house, stable, and barn were saved. Next planned was renovation of the Lodge for high-end condos, which many of us wished we could afford. This worked until the night in 2009 when I watched this beloved landmark enveloped in flames. It is still painful to see the vacant site of so much Rockville history.

So now a new owner has proposed townhouses on the site of the old sanitarium. I do not believe this building type is appropriate, nor do I think the City should quickly approve a change to the 2006 PRU to accommodate this request.

I believe the existing PRU requires a single multi-family building at the former site. It demands homage to Chestnut Lodge in its scale, verticality, massing, and architecture. I translate that into a vertically-oriented building that features residential units, underground parking, 4 attractive facades, a common entrance, similar road configuration, and use of architectural elements that reflect what Rockville has lost.

Townhouses, no matter how well designed, fly against the rhythm of this historic campus. As proposed, the plan is for an urban, sprawling building type that is out of character with its historic suburban setting. I challenge the applicant and his architects to be creative and to strongly consider returning to the approach that has already been approved by the City and likely would be accepted by the community.

In terms of economic feasibility, I refer you to recent success on the campus of the National Park Seminary in Forest Glen. The former Gymnasium has been re-used as 12 luxury residential units, ranging from efficiency to 3-bedroom condos. This Greek temple is lovely from 4 facades, has a common entrance and amenities, is as close to major roads and Metro as is Chestnut Lodge, and.... units are selling to happy new owners. I wish the same for Chestnut Lodge and Rockville.

Some have suggested that insufficient documentation exists about the old hotel and main lodge building.... documentation needed to recall specifics about the historic structure, to make exterior re-creation feasible, to identify specific architectural features

to include in any new construction, or simply to maintain a good archival record of a lost Rockville landmark.

My experience leads to a different conclusion. A list of readily available resources includes the following:

Numerous exterior and interior photos of the Main Lodge from 1910-2000 exist. They can easily be accessed at Peerless Rockville, on-line, and in personal collections.

The National Register nomination (1974) for West Montgomery Avenue Historic District called out Chestnut Lodge as a landmark and anchor for the western boundaries of the historic district.

Chestnut Lodge was included in one of the first three City of Rockville Historic Districts in 1974, removed in 1975, and returned to the West Montgomery Avenue HD in 2002.

A detailed survey of every building on the Chestnut Lodge campus was completed in 1997 for the City by Ward Bucher Architect.

Primary sources: numerous memoirs, recollections, oral histories, photographs. Other sources held by individual Bullard family members and Chestnut Lodge records that were under Court supervision for disposition can be tracked down, as can self-studies and internal publications of Chestnut Lodge employees.

Secondary sources: articles, papers, documentaries, histories, publications by Chestnut Lodge sources and others, a list I made of items in Lodge archives in 2006.

Artifacts: bricks retrieved after the fire, mahogany table donated by Anne Bullard, postcards.

May 2006 plans and elevations (a City of Rockville requirement of the 2006 PRU) by Ohrlein Architects.

Documentary videotaped by Tom Hoopengardner 2008-2009 depicting the history and restoration of Frieda's Cottage, and the close relationship between Dr. Frieda Fromm-Reichmann, the Bullard family, the community, and Chestnut Lodge. Individuals taped included Dr. Ann Silver (CL psychiatrist), Jack Baur (CL groundskeeper), and Phyllis Marcuccio (life-long Rockville resident). Although this project was not completed due to financial restrictions, considerable unedited videotape exists.

"Places from the Past" segments, filmed in and around the main lodge building in 2003 and 2009, are available through County Cable Montgomery. Produced by Barbara Grunbaum for the Montgomery County Council, portions of segment #63 were filmed at Chestnut Lodge.

[https://www.youtube.com/watch?v=tpHNyiDm0Nw&list=PL617968929B219D3F&index=](https://www.youtube.com/watch?v=tpHNyiDm0Nw&list=PL617968929B219D3F&index=25)

[25](https://www.youtube.com/watch?v=tpHNyiDm0Nw&list=PL617968929B219D3F&index=25)

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 5:18 PM
To: Babak Amin; mayorcouncil
Subject: RE: Chestnut Lodge Proposed Development

Mr. Amin,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Babak Amin [mailto:babak.v.amin@gmail.com]
Sent: Monday, April 25, 2016 4:54 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Chestnut Lodge Proposed Development

Dear Rockville Mayor and Council members,

My name is Babak Amin and I live at 10 Henson Oaks Lane (Thirty Oaks). I'm writing to you on behalf of thirty oaks HOA and in regards to the planned meeting tonight to discuss the proposed new/modified plan for Chestnut lodge development.

Please do not approve this request to build a larger building in place of where Chestnut lodge used to sit.

We feel that anything that is built on the Chestnut Lodge property should conform as much as possible to the plan that was originally approved for the site. Any new construction should stay within the original approved footprint - namely 7 condominiums with one garage entrance in the rear rather than nine entrances. Since the proposed development would be constructed on land designated as historic and the west side (rear) would be seen from West Montgomery Avenue (historic) and Henson Oaks Lane (which is not historic), we favor condominiums over townhouses.

In conclusion, we are not in favor of the plan as submitted and should be modified and resubmitted.

Thank you for your time and consideration

ATTACHMENT C

Regards
Babak Amin

Sara Taylor-Ferrell

From: Sara Taylor-Ferrell
Sent: Monday, April 25, 2016 6:17 PM
To: Larry Giammo; Craig Simoneau
Cc: mayorcouncil
Subject: RE: concerns regarding the City's Planning Department and Historic District Commission

Mr. Giammo,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Larry Giammo [mailto:larry@larrygiammo.com]
Sent: Monday, April 25, 2016 6:10 PM
To: Craig Simoneau <csimoneau@rockvillemd.gov>
Cc: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: concerns regarding the City's Planning Department and Historic District Commission

Craig (with a copy to the Mayor & Council and City Clerk),

I will speak tonight during the public hearing on the townhouses proposed for the historic Chestnut Lodge site. Via this email, I'd like raise general concerns about the City of Rockville's Planning Department and Historic District Commission which have become apparent, as a by-product of engaging on the townhouse proposal.

Concern #1: City staff has stated on multiple instances that the exterior of the original Main Building at Chestnut Lodge cannot be accurately reconstructed because the information upon which to base an accurate reconstruction does not exist. However, this is utterly false. In fact, and as you'll hear during the public hearing, significant resources upon which to base an accurate reconstruction do exist – there's a plethora of photographs, plans, surveys, descriptions, and even actual building materials. Yet, your staff, until just a few weeks ago, was completely unaware of any it. The reason: Absolutely, no effort was made to identify what might be available.

Concern #2: When the Historic District Commission was to provide their courtesy review of the townhouse proposal, your staff instructed the HDC to, and I quote from the staff report, "provide suggestions to the applicant for incorporation into the final submittal, particularly with respect to architectural details." However, the HDC's role in regard to this application is ultimately much, much more significant. Maryland state law specifies the HDC's duty here, and I quote: "Unless the commission is satisfied that the proposed construction, reconstruction, or alteration

will not materially impair the historic, archaeological, or architectural significance of the site, the commission shall reject the application." The HDC has yet to at all consider this over-arching question. Why the huge disconnect between the HDC's duty per State law versus what they were told by City staff?

Concern #3: The first 30 to 45 minutes of every Historic District Commission meeting is now being held off-camera, in a conference room. During that time, the HDC and City staff substantively discuss agenda items they'll be voting on later during the same meeting (I know this because I listened from around the corner, out of sight, at a recent meeting). No, this is not a violation of Maryland's open meeting laws – the conference room door is open, so I suppose anyone could walk in, assuming they knew they were allowed to. But, purposefully and repeatedly having substantive discussion off-camera is certainly a violation of the spirit of openness, accessibility and transparency that Rockville residents expect our City government to honor. Very simply, the only reason to meet off camera would be to prevent people from knowing what's being discussed.

Concern #4: At the end of the Historic District Commission meeting on April 21, it was announced by City staff that there will be a so-called "legal symposium" on Saturday, June 11 for Historic District Commissioners, the City Council and City staff, to discuss the laws associated with historic preservation. It was indicated this meeting would be by invitation only, and would not be open to the public. Very simply, a closed meeting by the Historic District Commission or the City Council as described by City staff would be a violation of the State's open meeting law. Anyone within City government should know this.

Concern #5: It was brought to the City government's attention five months ago that City staff unilaterally approved the building permits for the final four single family homes in the Chestnut Lodge development – an act which was in clear conflict with the Chestnut Lodge PRU's explicit requirement that the Main Building be rehabilitated before those final four building permits could be issued.

The purpose of that requirement was obvious: To provide the developer an incentive to protect and rehabilitate the Main Building. Despicably, the developer instead left the Main Building unsecured, despite knowing that intruders were regularly entering the building. As a result of the developer's willful negligence, the Main Building was destroyed by a fire set by intruders. Knowing all of that, your staff still went ahead and issued those last four building permits regardless. This was both shameful and illegal.

The logic/argument that the condition could be ignored simply because it could no longer be complied with (because the Main Building was gone) does not hold water. What if the condition had been written thusly: "The final four building permits shall not be issued unless the applicant successfully protects the Main Building from further deterioration and until the Main Building is rehabilitated?" Well, that would have been impossible to be complied with after the Main Building was destroyed, right? Or, what if the condition was as it had actually been written but the Main Building hadn't been destroyed, and the developer came in and was able to prove he was broke and didn't have the money to rehabilitate the Main Building? Well, that would have made the condition impossible to be complied with. Or,...I can come up with innumerable examples of how a condition could become impossible to fulfill; however, that alone would not be the basis for unilateral negation of the condition.

Overall, the common thread through all of these concerns is a larger, systemic concern which has become increasingly apparent over time: A troubling lack of oversight and accountability within the City's Planning Department.

I was reminded recently of the City government's APFO debacle (what was it, six or seven years ago?) – when the City government didn't follow its own APFO laws, refused to listen to anyone with knowledge on the subject, had to be taken to court by Rockville residents (at great expense to those residents), then lost to those residents in court – and was on the receiving end of a scathing, unanimous ruling that was highly critical of the City government. The City government never apologized. More troubling, the senior staff at the heart of that matter were never held accountable for their abject failure. And, now, some of those same senior staff members are involved in the concerns I've just raised.

The ability to exercise local land use authority is one of the primary reasons to have a City government. However, that land use authority is of no value with a Planning Department which repeatedly exhibits a lack of competence, motivation or concern. If I were on the Council today, and I don't say this lightly, the City's Planning Department would receive an unequivocal vote of no confidence from me. The obvious lack of oversight and accountability should be fixed.

178

ATTACHMENT C

Ultimately, all of this plays into a very real, very serious question. Rockville residents/businesses pay a lot in extra property taxes to have a City government (versus if the city government simply did not exist). For my part, I honestly/objectively think it's becoming increasingly difficult to support the narrative that folks are getting their money's worth.

I would be happy to discuss these matters with you directly, if you would like.

Thank you,

Larry

PS – Please enter this email into the record for the Chestnut Lodge townhouse proposal.

Larry Glammo

larry@larryglammo.com

301-213-5678

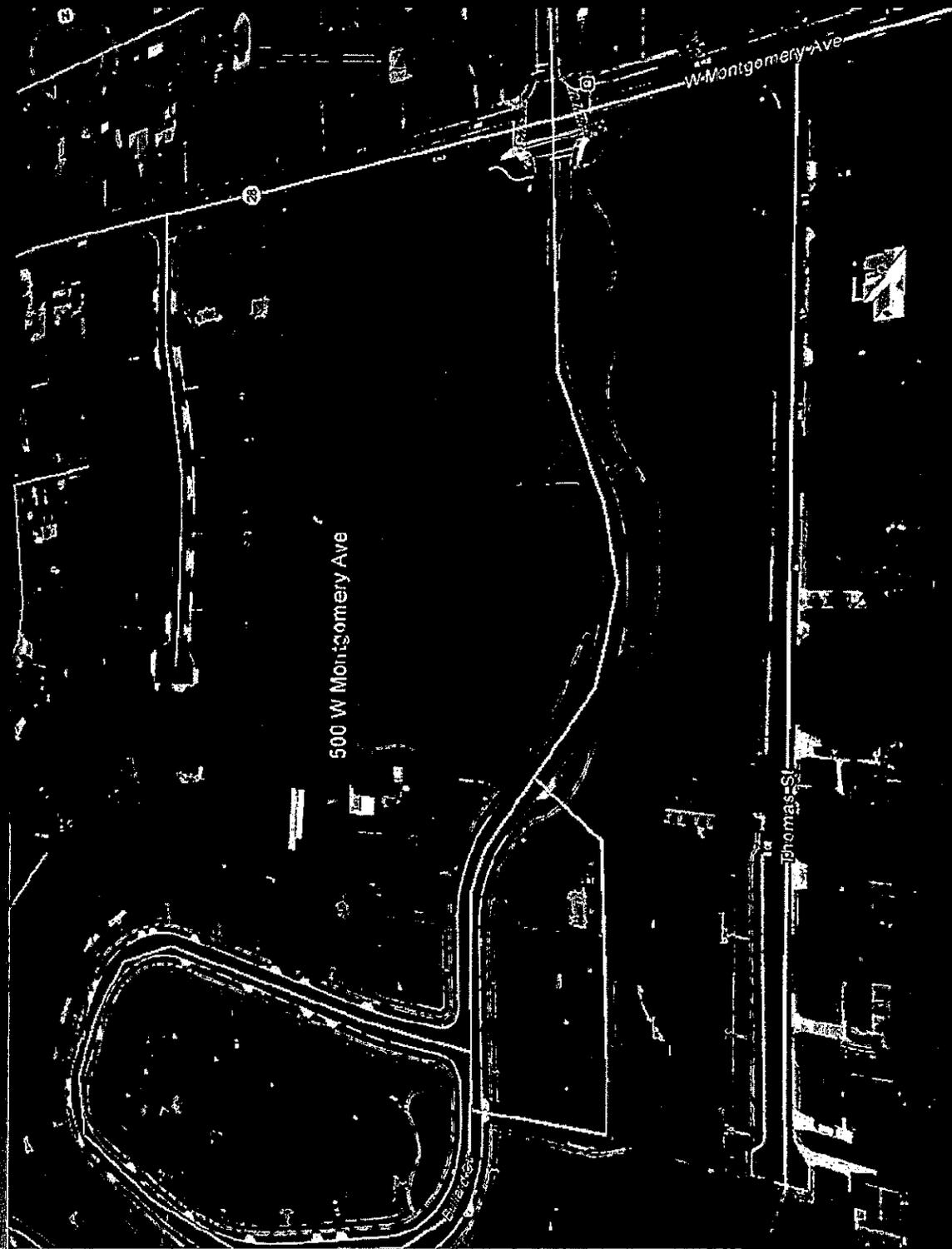
MAYOR AND COUNCIL
PUBLIC HEARING

APRIL 25, 2016

CHESTNUT LODGE
PROJECT PLAN AMENDMENT
PJT2015-00005

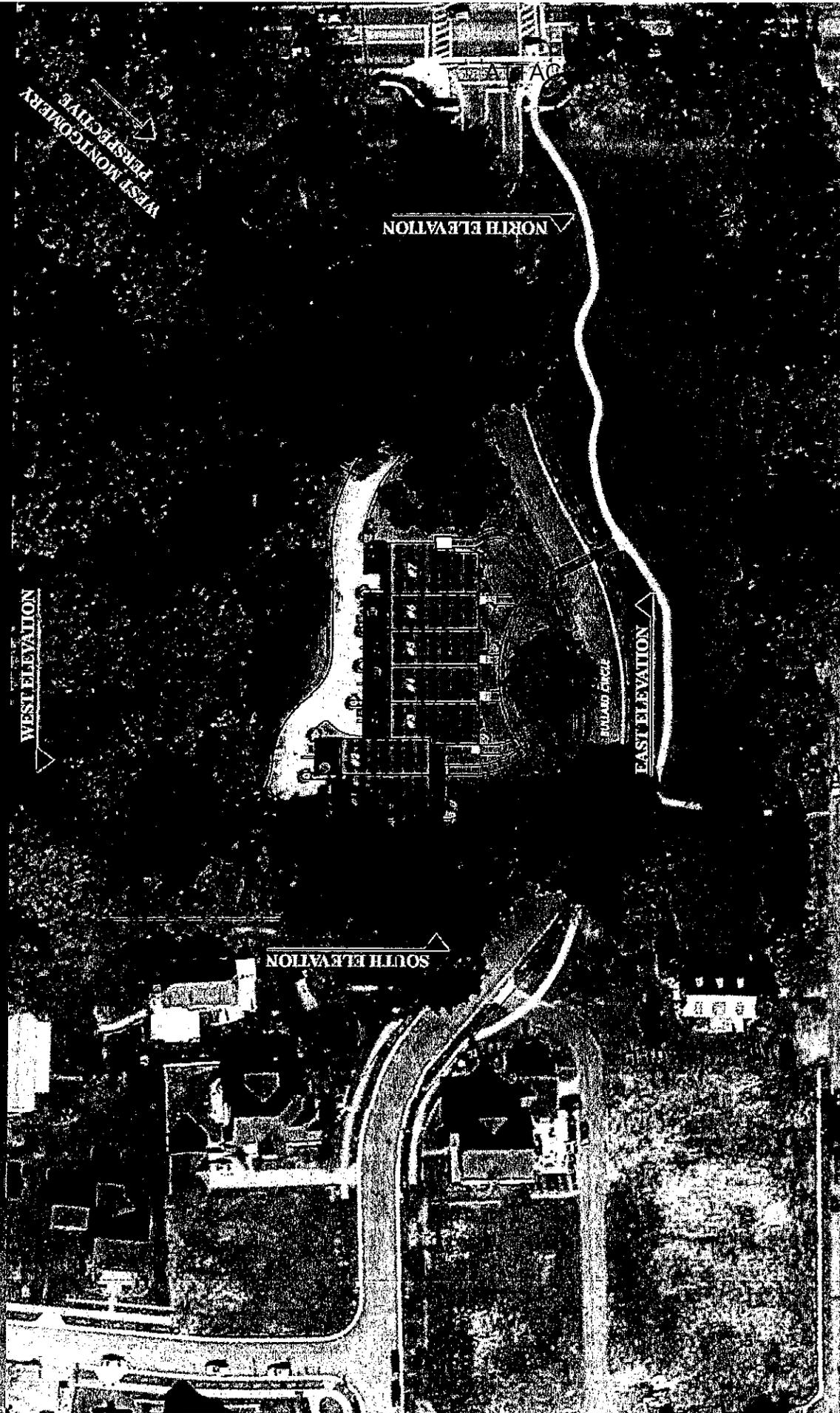
JNP CHESTNUT LODGE LLC, APPLICANT

Aerial View of Parcel



© 2015 Google
Imagery Date: 4/11, 2015 39°05'00.98" N 77°09'46.34" W elev: 444 ft eye alt: 1305 ft
Google earth

Illustrative Site Plan



PARKER RODRIGUEZ, INC.
Landscape Architecture, Land Planning, Urban Design
CREASER/O'BRIEN
ARCHITECTS
1000 W. 10TH AVENUE, SUITE 1000
DENVER, CO 80202

CHESTNUT LODGE
TOWN HOME SITE PLAN



SEPTEMBER, 2015

Proposed East Elevation View

182



182

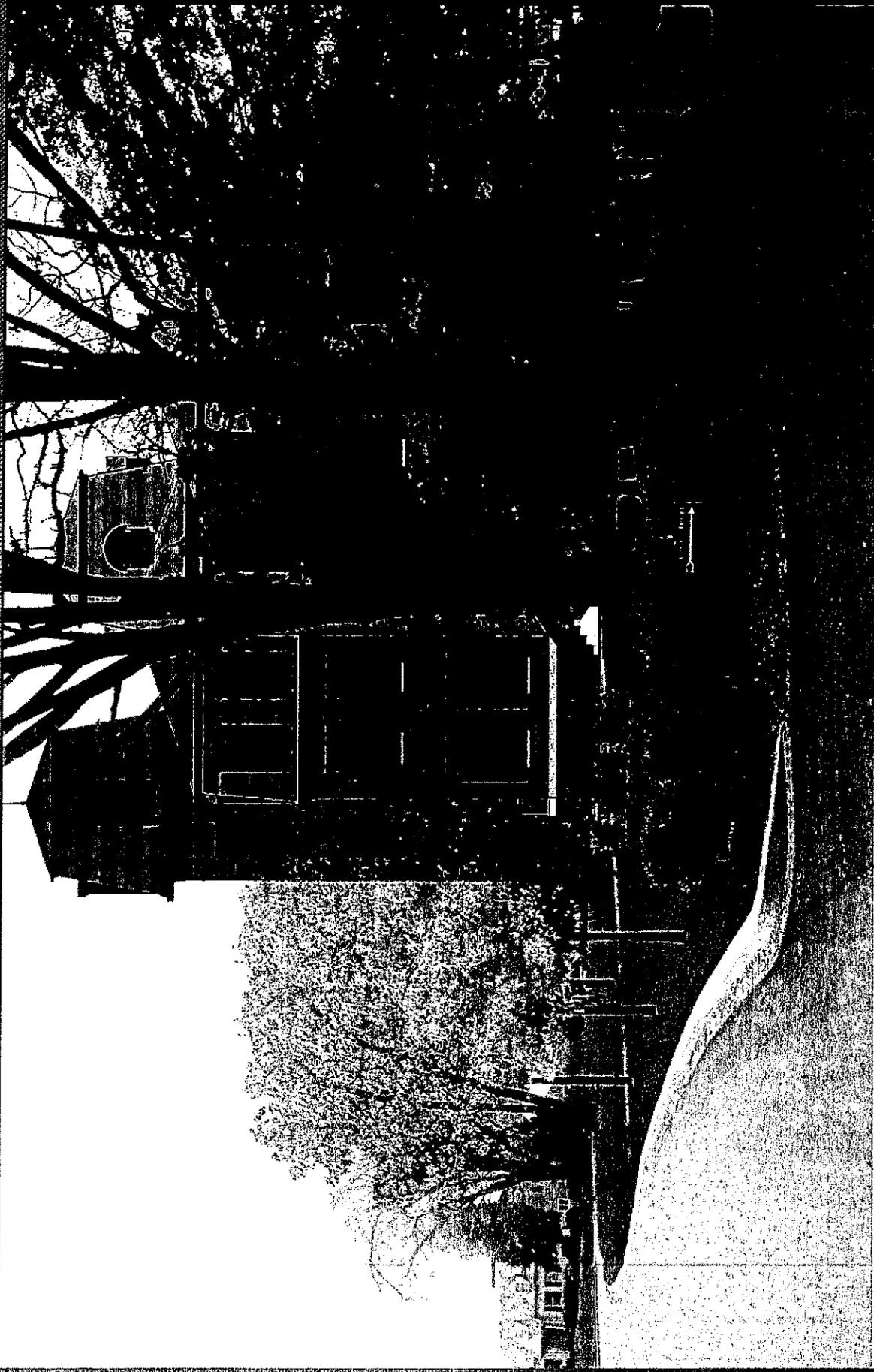
PARKER RODRIGUEZ INC.
Landscape Architecture Land Planning Urban Design

CREASER/O'BRIEN
ARCHITECTS
100 MARKET ST. 5TH FLOOR
BOSTON, MA 02107

CHESTNUT LODGE
EAST ELEVATION

SEPTEMBER, 2015

Proposed North Elevation View



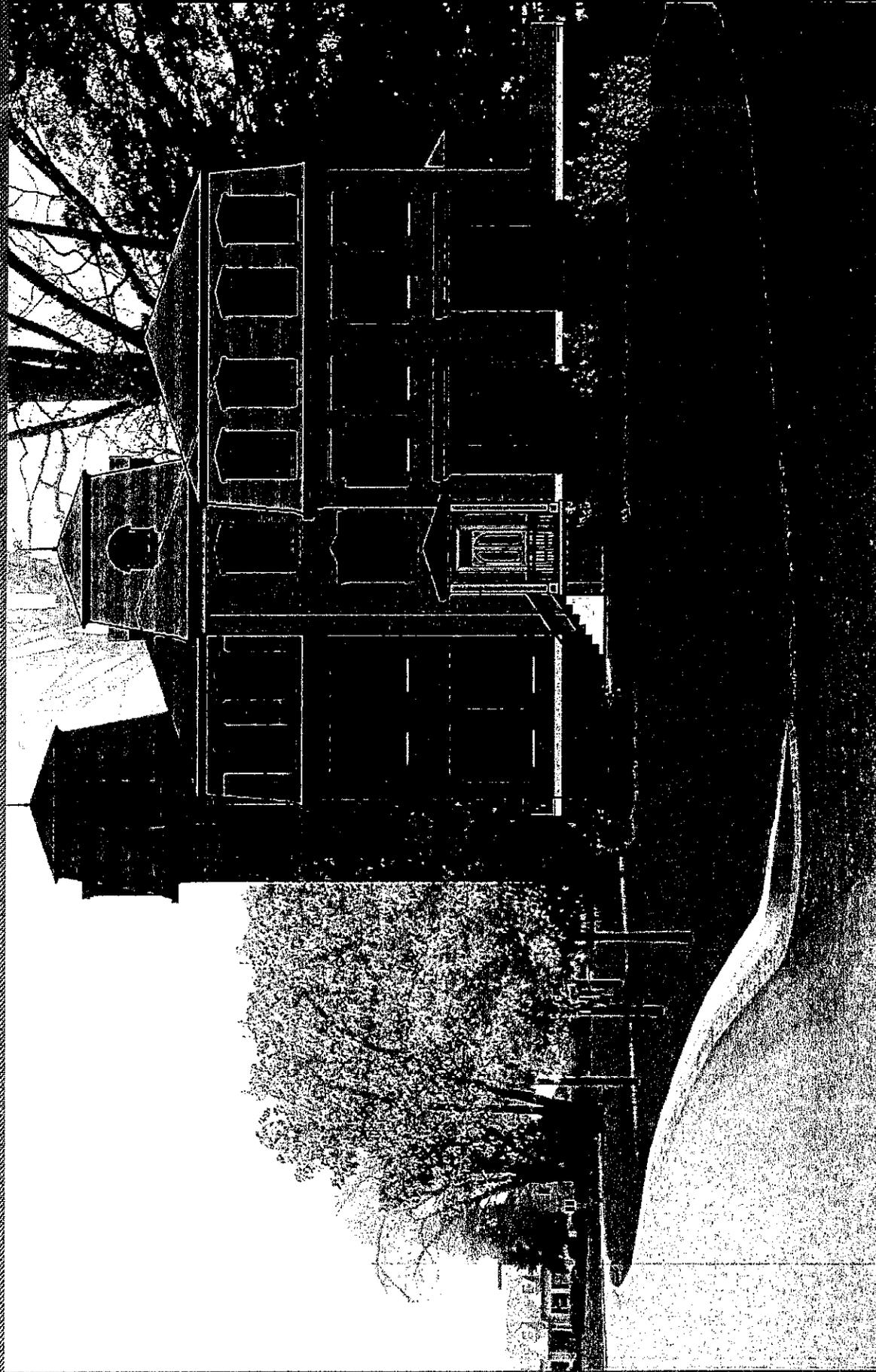
SEPTEMBER, 2013

CHESTNUT LODGE

NORTH ELEVATION

PARKER RODRIGUEZ, INC.
Landscape Architecture Land Planning Urban Design
CREASER O'BRIEN
ARCHITECTS
1000 N. 10TH AVENUE, SUITE 200
DENVER, CO 80202

Proposed North Elevation View



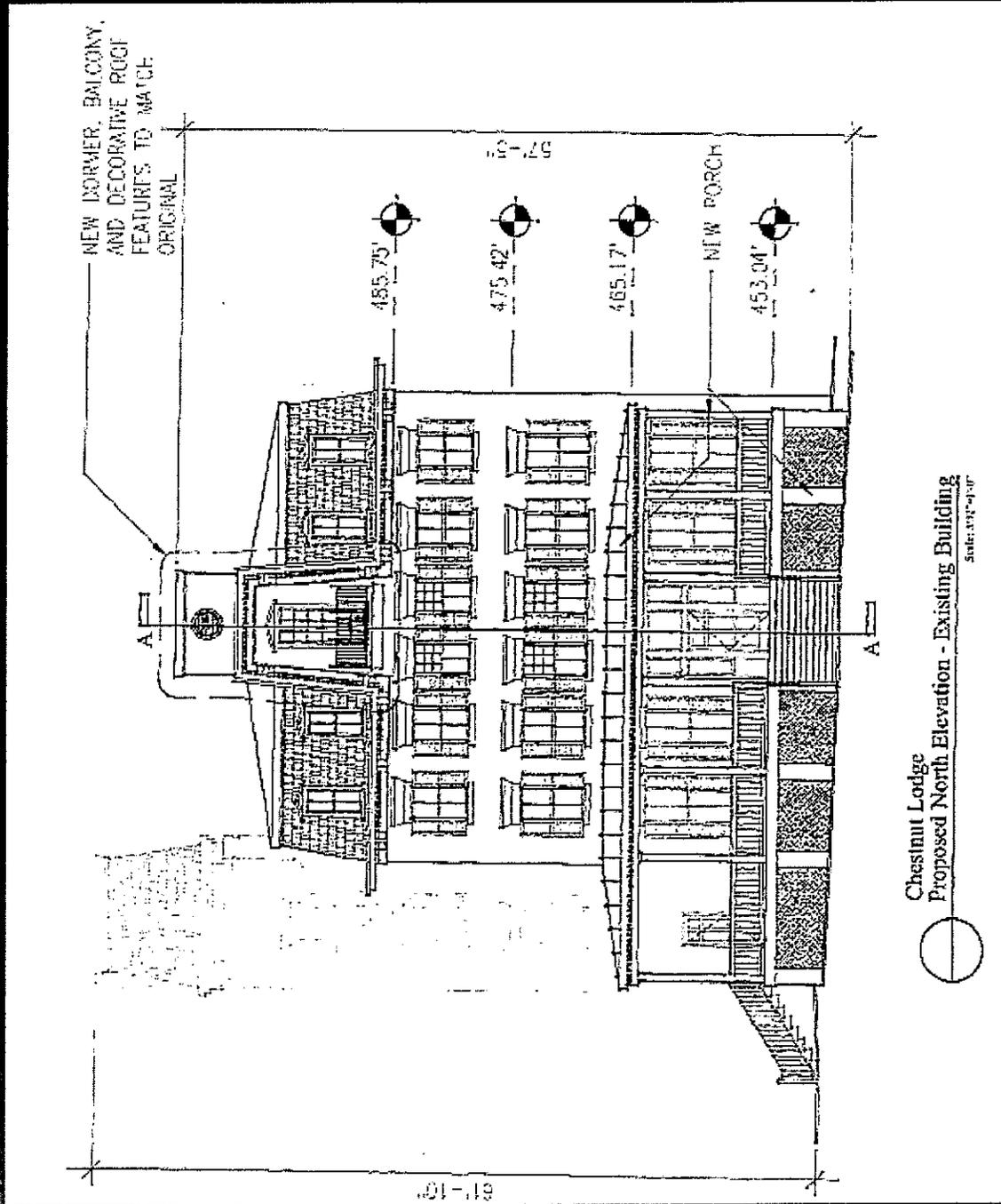
PARKER RODRIGUEZ, JR. INC.
Landscape Architecture and Land Planning, Urban Design
CREASER O'BRIEN
ARCHITECTS
1450 W. 10th St., Suite 100
Tulsa, Oklahoma 74106

CHESTNUT LODGE

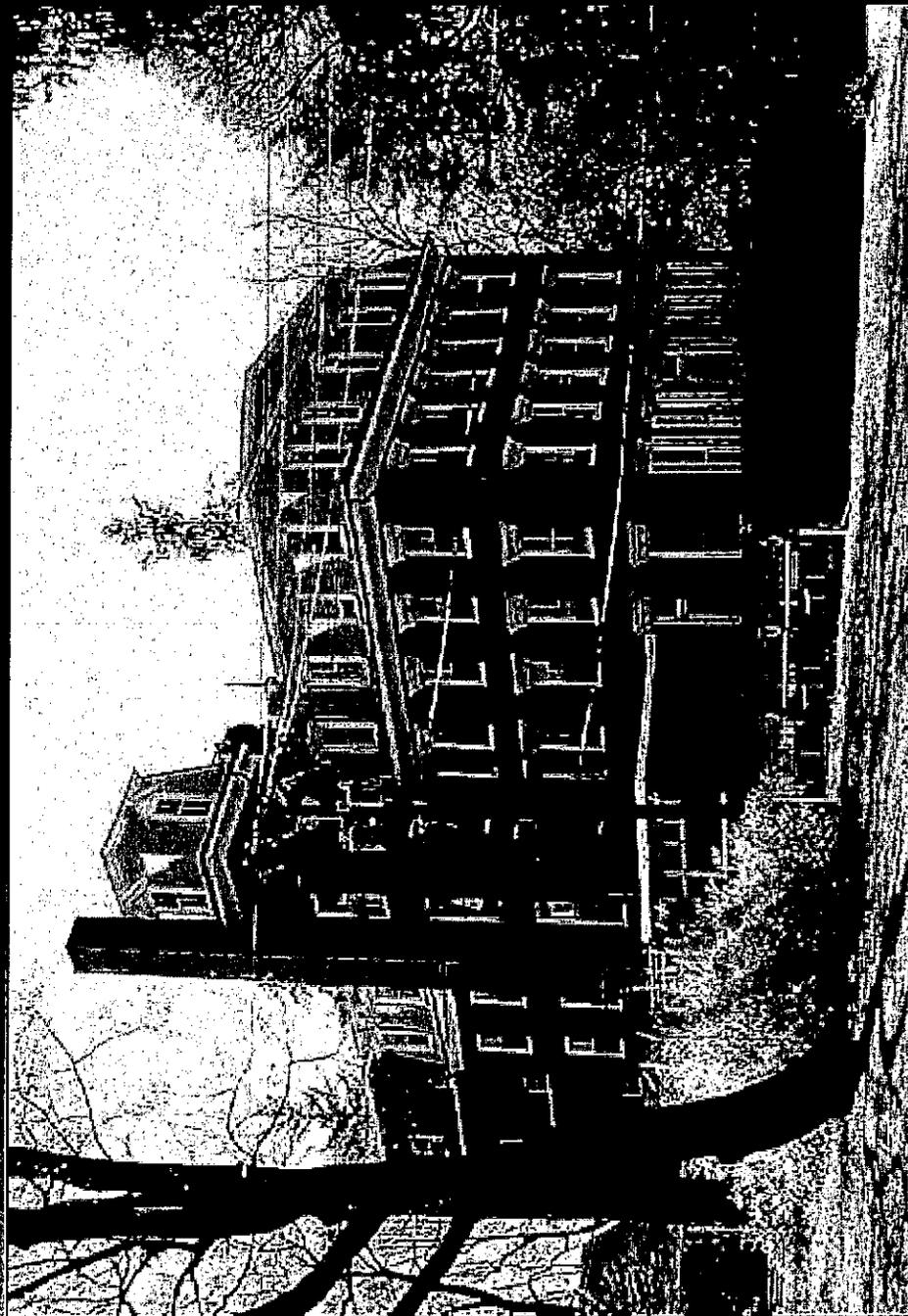
NORTH ELEVATION

SEPTEMBER, 2013

Original PRU North Elevation



Main Lodge Building in 2003



Proposed East Elevation View



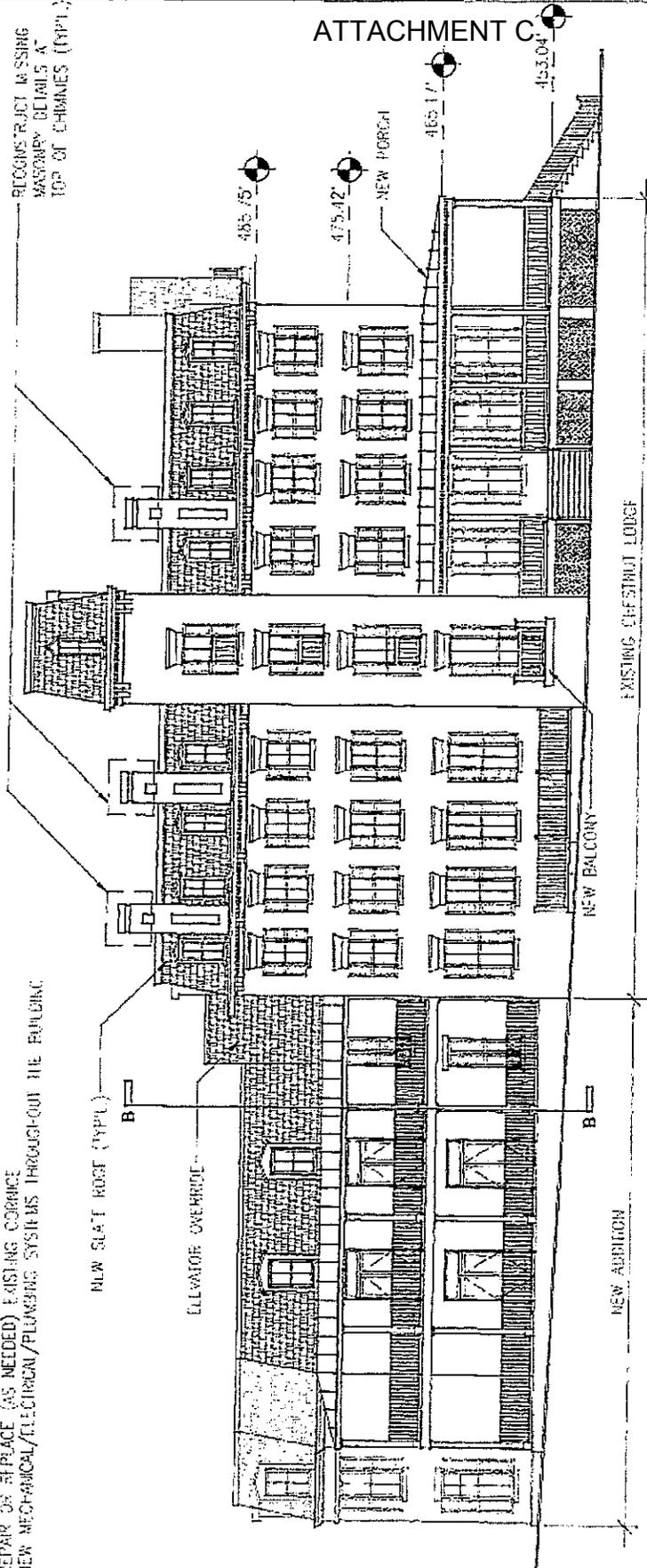
PARKER RODRIGUEZ INC.
 Landscapes Architecture Land Planning Urban Design
 CREASER O'BRIEN
 ARCHITECTS
 1000 W. 10th Street, Suite 100
 Oklahoma City, OK 73106

CHESTNUT LODGE
 EAST ELEVATION

Original PRU East Elevation

GENERAL RESTORATION NOTES

- RESTORE EXISTING WOOD WINDOWS. REPLACE MISSING WINDOWS. INSTALL NEW INTERIOR STORM PANELS. INSTALL NEW SWITZERS TO MATCH ORIGINAL. INSTALL NEW DECORATIVE WINDOW HOODS.
- PAINT MASONRY OF EXISTING BUILDING TO REPLICATE ORIGINAL CONDITION/COLOR. REPLACE DAMAGED MASONRY AND MORTAR WITH NEW TO MATCH EXISTING.
- INSTALL NEW SLATE ROOF.
- REPAIR OR REPLACE (AS NEEDED) EXISTING CORNICE.
- NEW MECHANICAL/ELECTRICAL/PLUMBING SYSTEMS THROUGHOUT THE BUILDING.



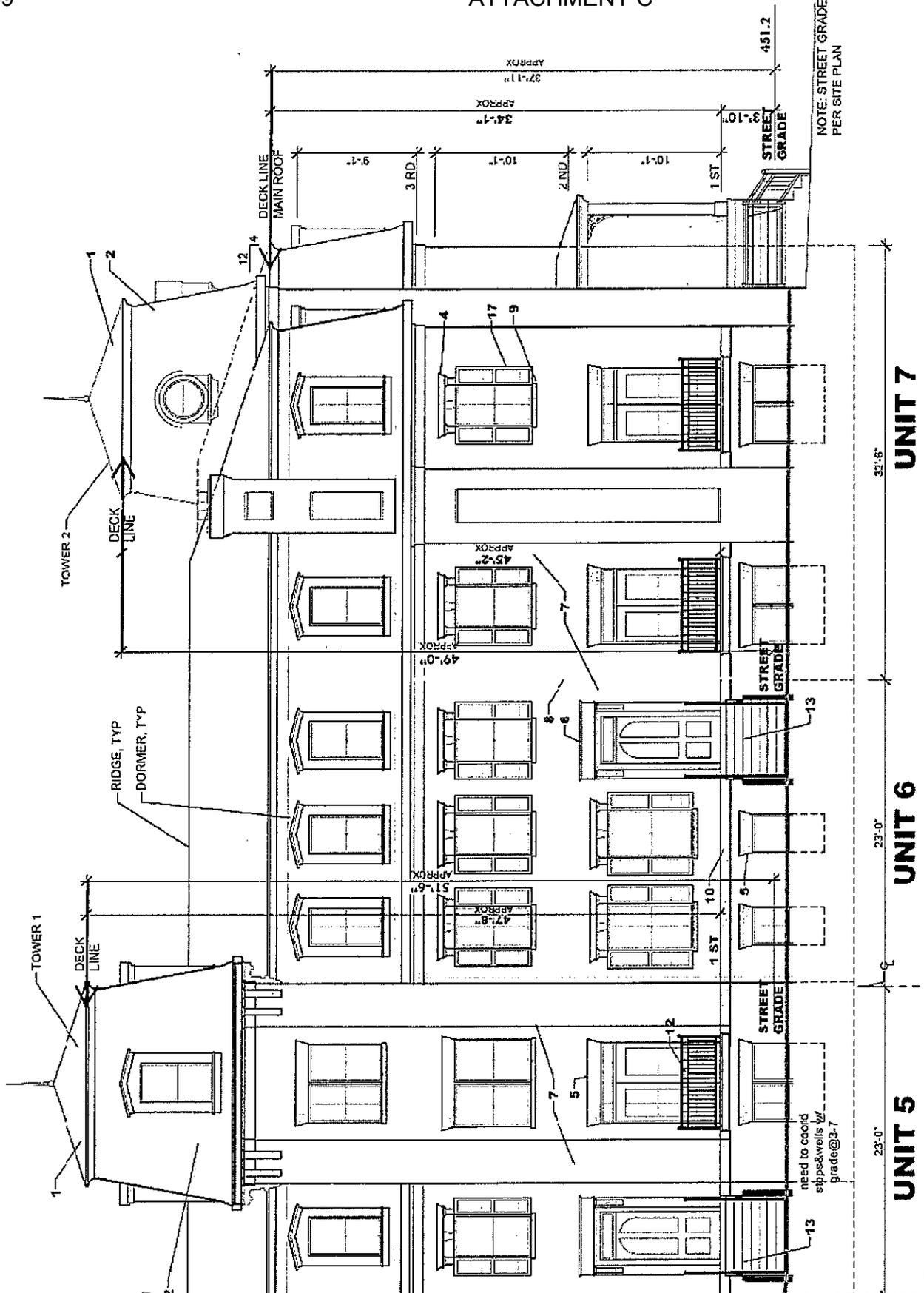
ATTACHMENT C

Chestnut Lodge - Proposed East Elevation
Scale: 3/32" = 1'-0"



<p>Developer: Chestnut Lodge Properties, Inc. 1719 West University Avenue Baltimore, MD 21204</p>	<p>Project: Chestnut Lodge Detailed Application Submission 100 West University Avenue Baltimore, Maryland</p>	<p>Drawing Title: Chestnut Lodge Proposed East Elevation</p>	<p>Architect: Oehrlein & Associates Architects 1330 Connecticut Ave., NW Suite 417 Washington, DC 20004 302.953.3234</p>	<p>Date: May 5, 2006</p> <p>Scale: 3/32" = 1'-0"</p> <p>Sheet: DA19</p>
--	--	---	---	--

Building Height - Measured to Deck Line of Mansard Roof



BUILDING HEIGHT COMPARISON TABLE

CENTERLINE OF STREET ELEVATION METHOD (ELEVATION 451.2)		PREVIOUS CHESTNUT LODGE APPROVALS
<i>Maximum Height Measured To</i>	<i>Provided (feet)</i>	
Deck Line of Main Roof	37.9	41*
Deck Line of Tower 1	51.5	63**
Deck Line of Tower 2	49.0	63**
AVERAGE GRADE ALONG BUILDING FRONTAGE (ELEVATION 452.0)		
<i>Maximum Height Measured To</i>	<i>Provided (feet)</i>	
Deck Line of Main Roof	37.1	41*
Deck Line of Tower 1	50.7	63**
Deck Line of Tower 2	48.2	63**

* Maximum height of previously approved new addition to historic Main Lodge structure.
 ** Maximum height of previous historic Main Lodge structure/tower.

South Elevation View



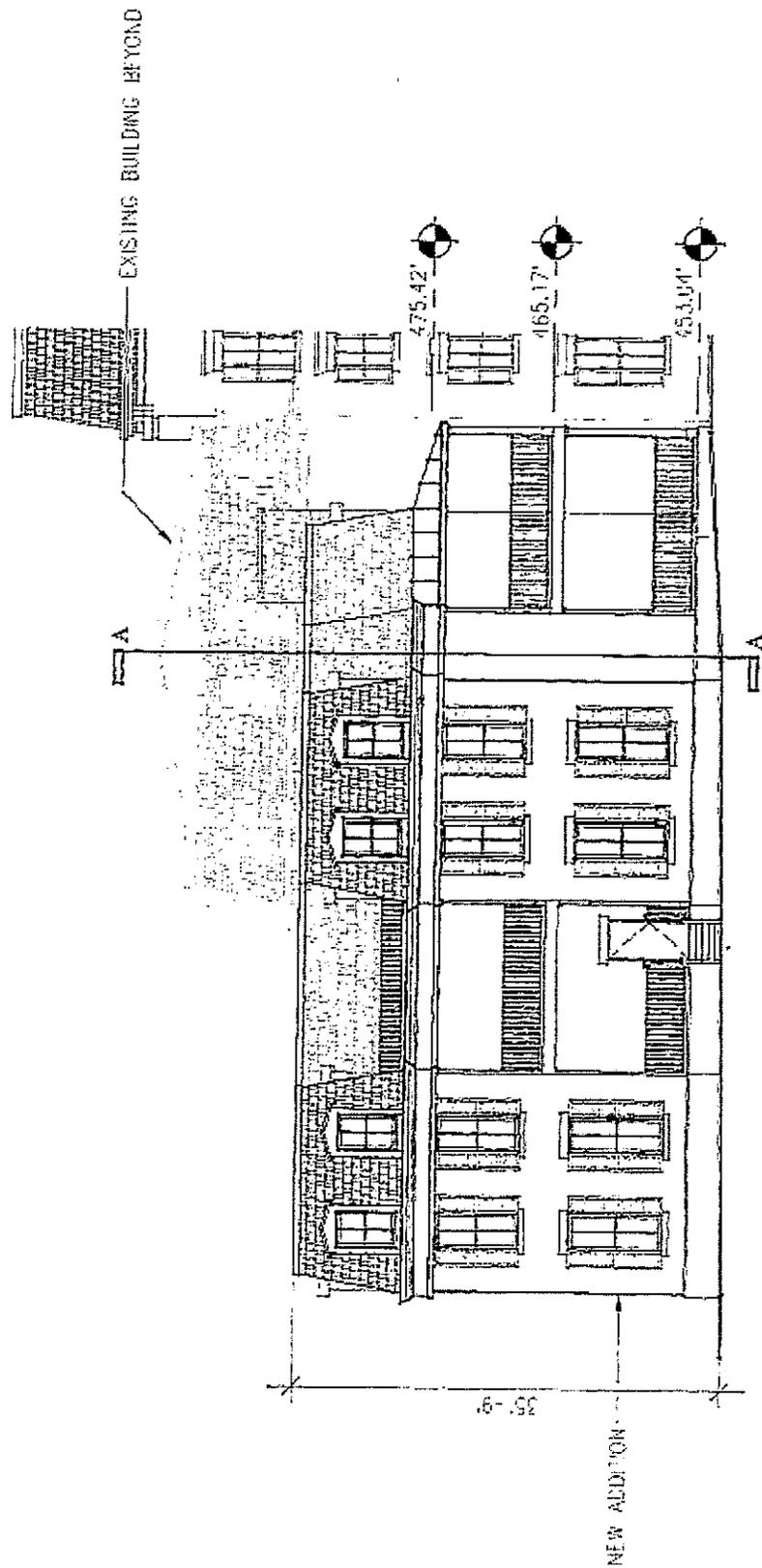
PARKER RODRIGUEZ, INC.
Landscape Architecture Land Planning Urban Design
CREASER/O'BRIEN
ARCHITECTS
100 N. BROADWAY, SUITE 1000
HOUSTON, TEXAS 77002

CHESTNUT LODGE

SOUTH ELEVATION

SEPTEMBER, 2015

Original PRU South Elevation



Chestnut Lodge - Proposed South Elevation
Scale: 3/4" = 1'-0"

West Elevation View

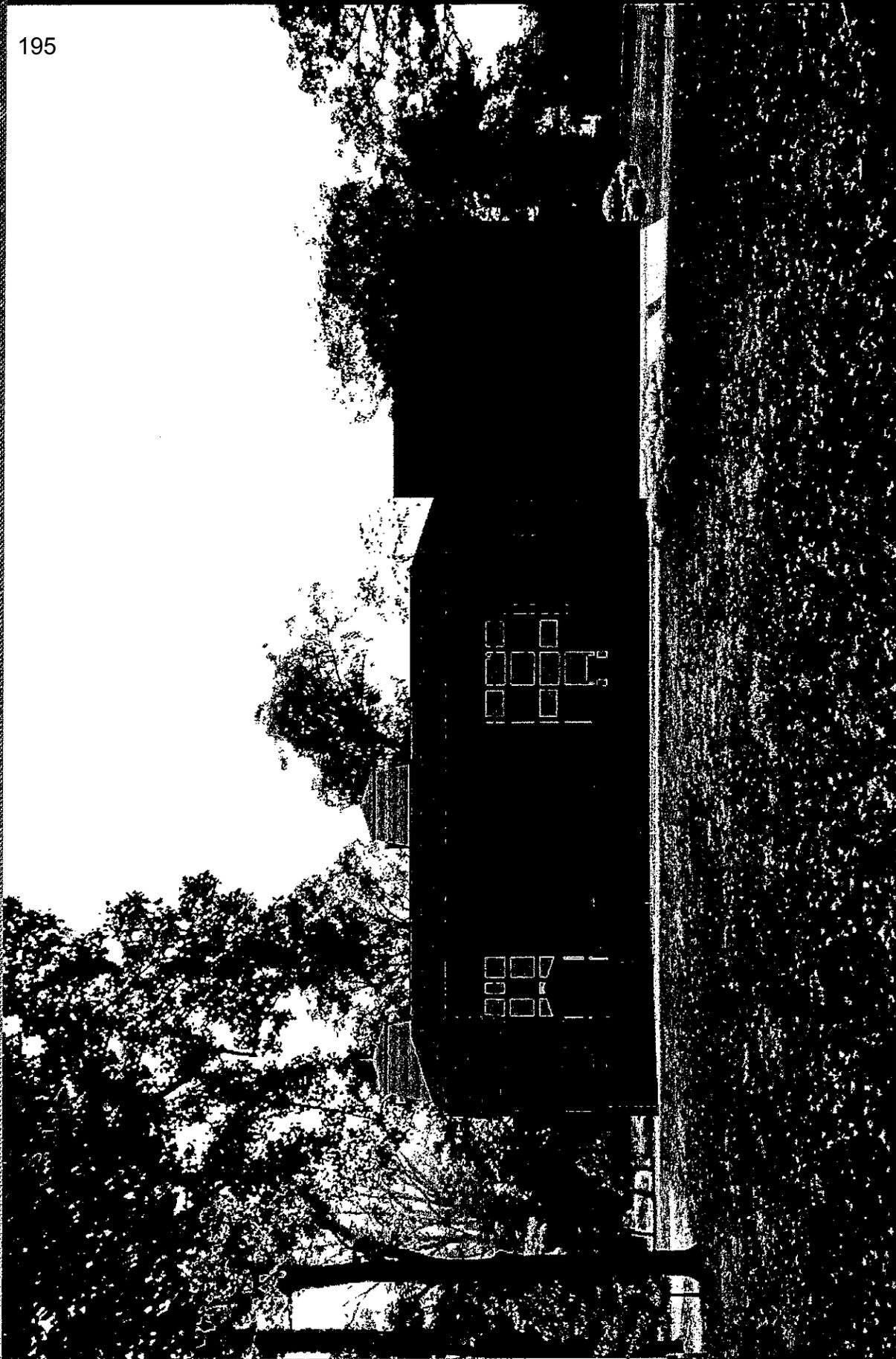


CHESTNUT LODGE
WEST ELEVATION

PARKER RODRIGUEZ, INC.
Landscape Architecture and Planning, Inc.
CREASER/CHAMBERLAIN
ARCHITECTS
1000 W. 10th St., Suite 100
Boulder, CO 80502

SEPTEMBER 2013

West Elevation View

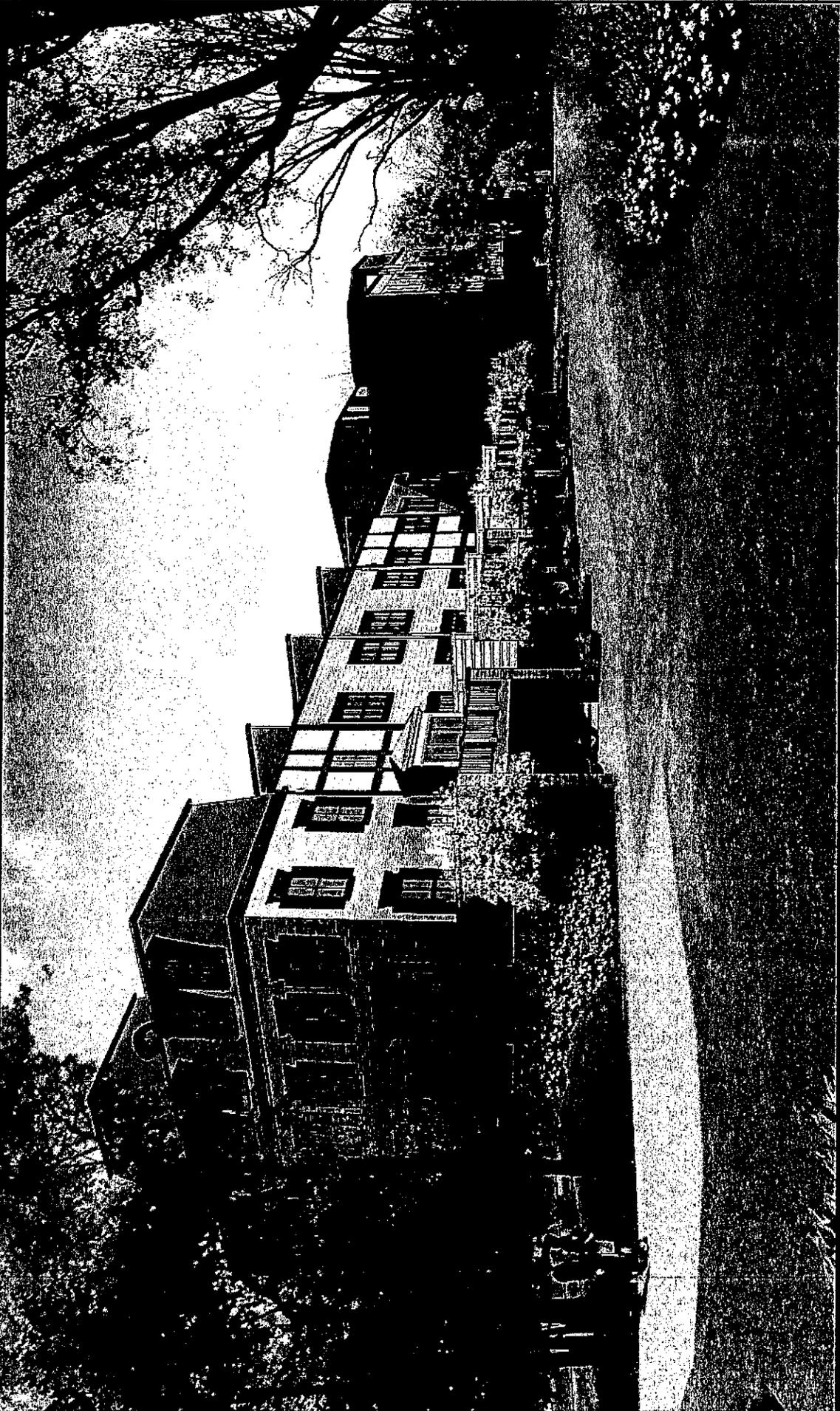


PARKER BONDURICK INC.
 Landscape Architecture & Planning
 CHESTER/OREN
 ARCHITECTS
 1000 N. 10th St. Ste. 200
 Lincoln, NE 68502

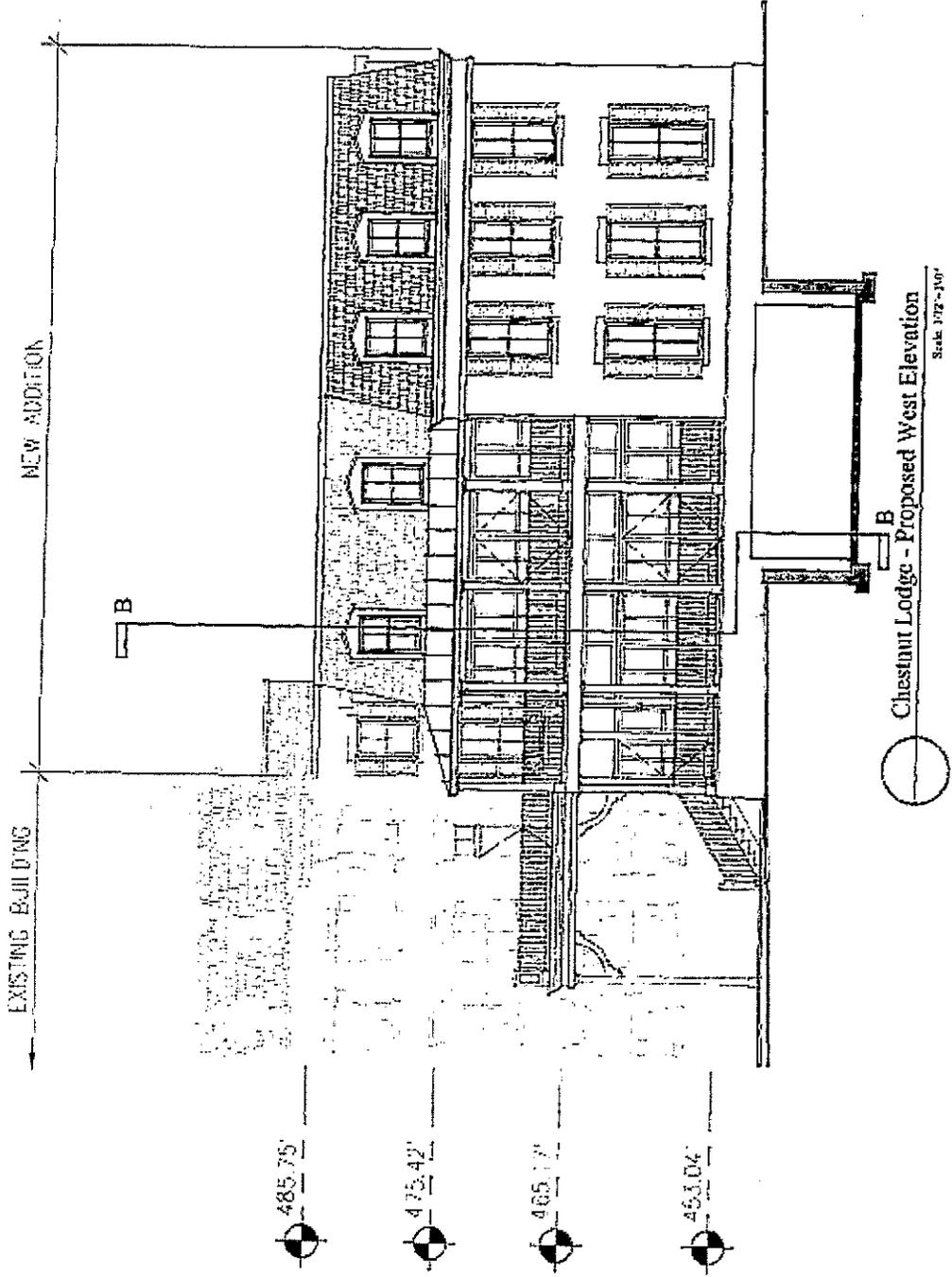
CHESTNUT LODGE
 WEST ELEVATION

NOVEMBER 2015

North and West Elevation Perspective



Original PRU West Elevation



West Montgomery Avenue Perspective

9



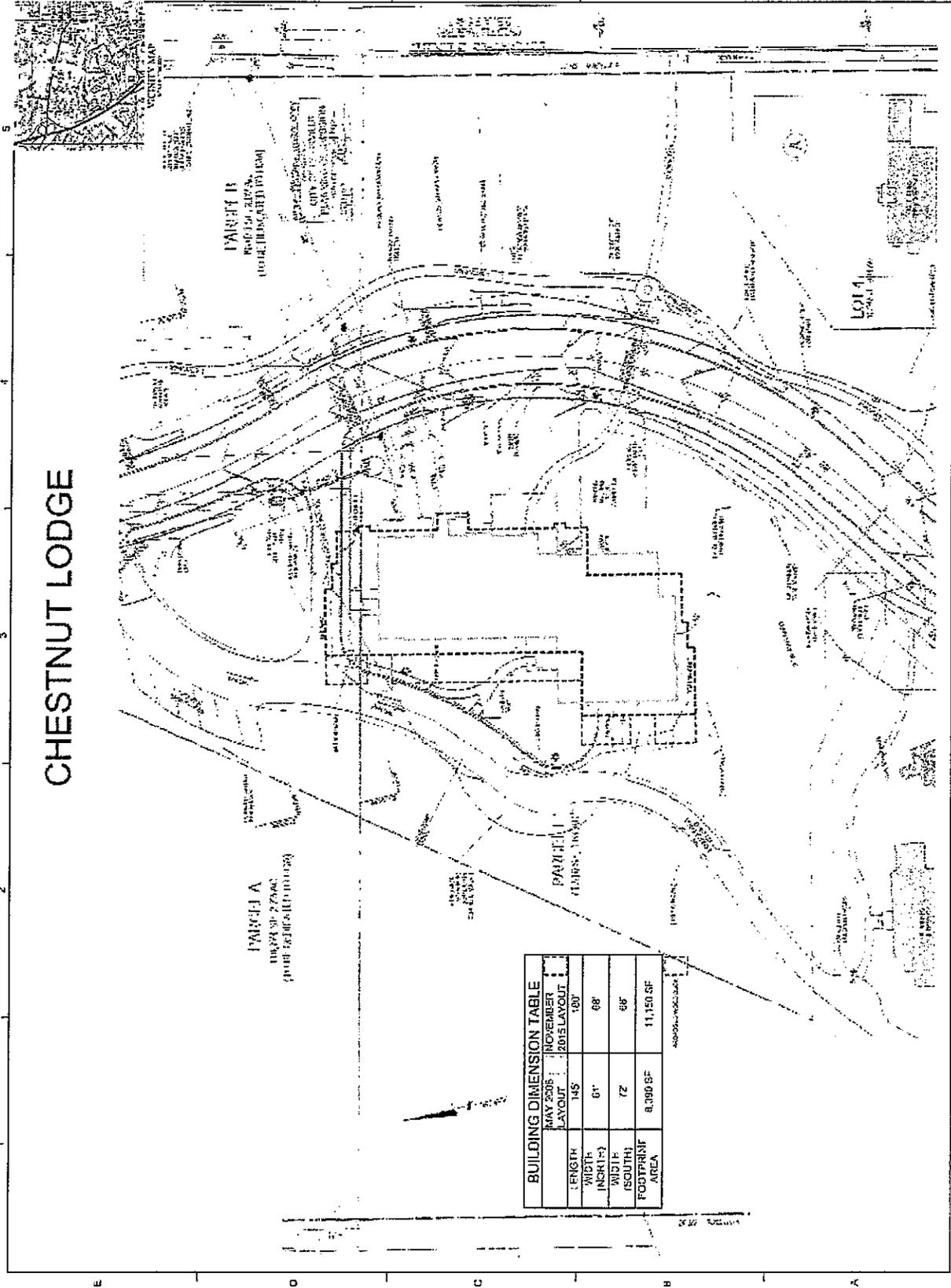
PARKER RODRIGUEZ, INC.
Landscape Architecture and Planning, Urban Design
CREASER/O'BRIEN
ARCHITECTS
100 S. 10TH ST., SUITE 200
PHILADELPHIA, PA 19107

CHESTNUT LODGE
WEST MONTGOMERY PERSPECTIVE

SEPTEMBER, 2015

Building Dimension Exhibit (November 2015)

CHESTNUT LODGE



BUILDING DIMENSION TABLE

	MAY 2008 LAYOUT	NOVEMBER 2015 LAYOUT
LENGTH (INCHES)	145	100
WIDTH (INCHES)	61	68
FOOTPRINT AREA	8,790 SF	11,150 SF

Dewberry

215 2nd Ave East, Suite 100
 27000155, Fax: 202/27017007
 dewberry.com

Client: Chestnut Lodge
 501 West Lake Drive
 Mount Airy, NC 27025

Project: CHESTNUT LODGE, LLC
 1000 W. Lake Drive
 Mount Airy, NC 27025
 PREPARED BY: DEWBERRY

Parcel 1, City of Rockville, MD
 Chestnut Lodge
 DIMENSION EXHIBIT
 DATE: 11/10/15

SCALE: 1" = 40'

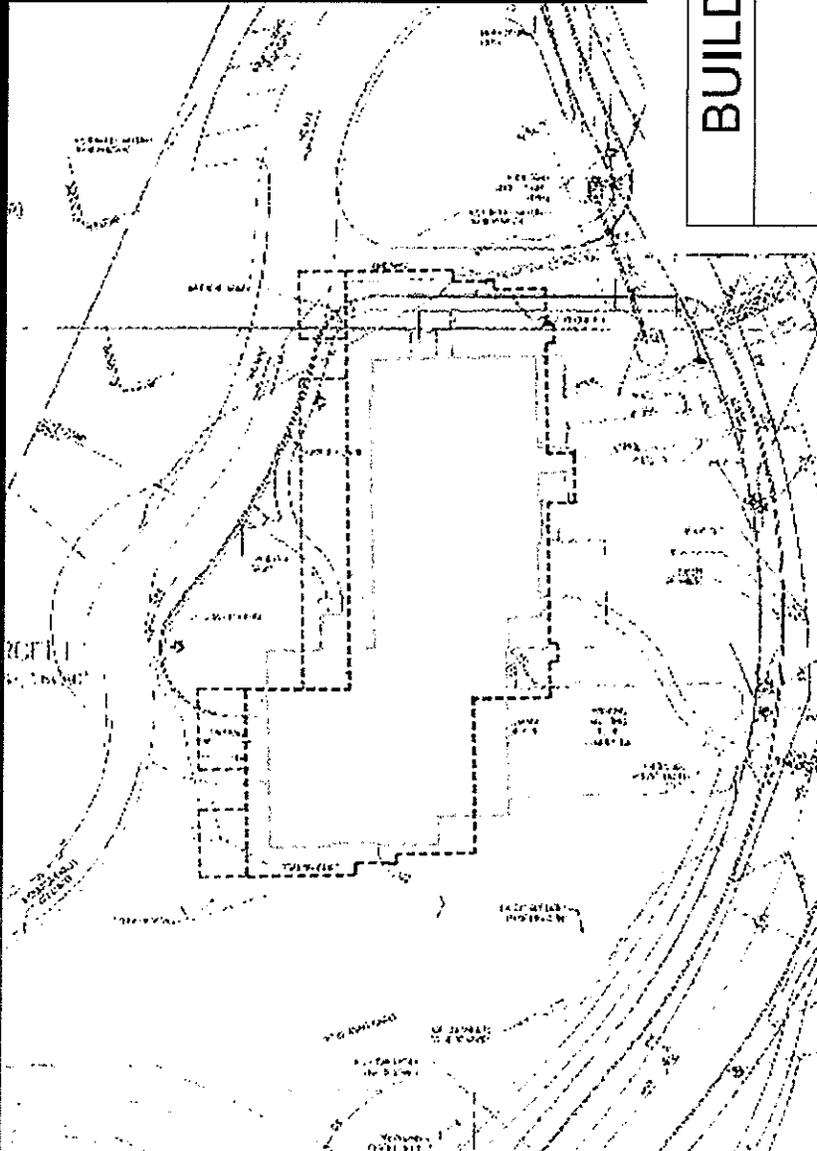
NO.	DATE	BY	REVISIONS

PROJECT NO. 15000155

DIM-1

1 of 1

Building Dimension Exhibit (November 2015)



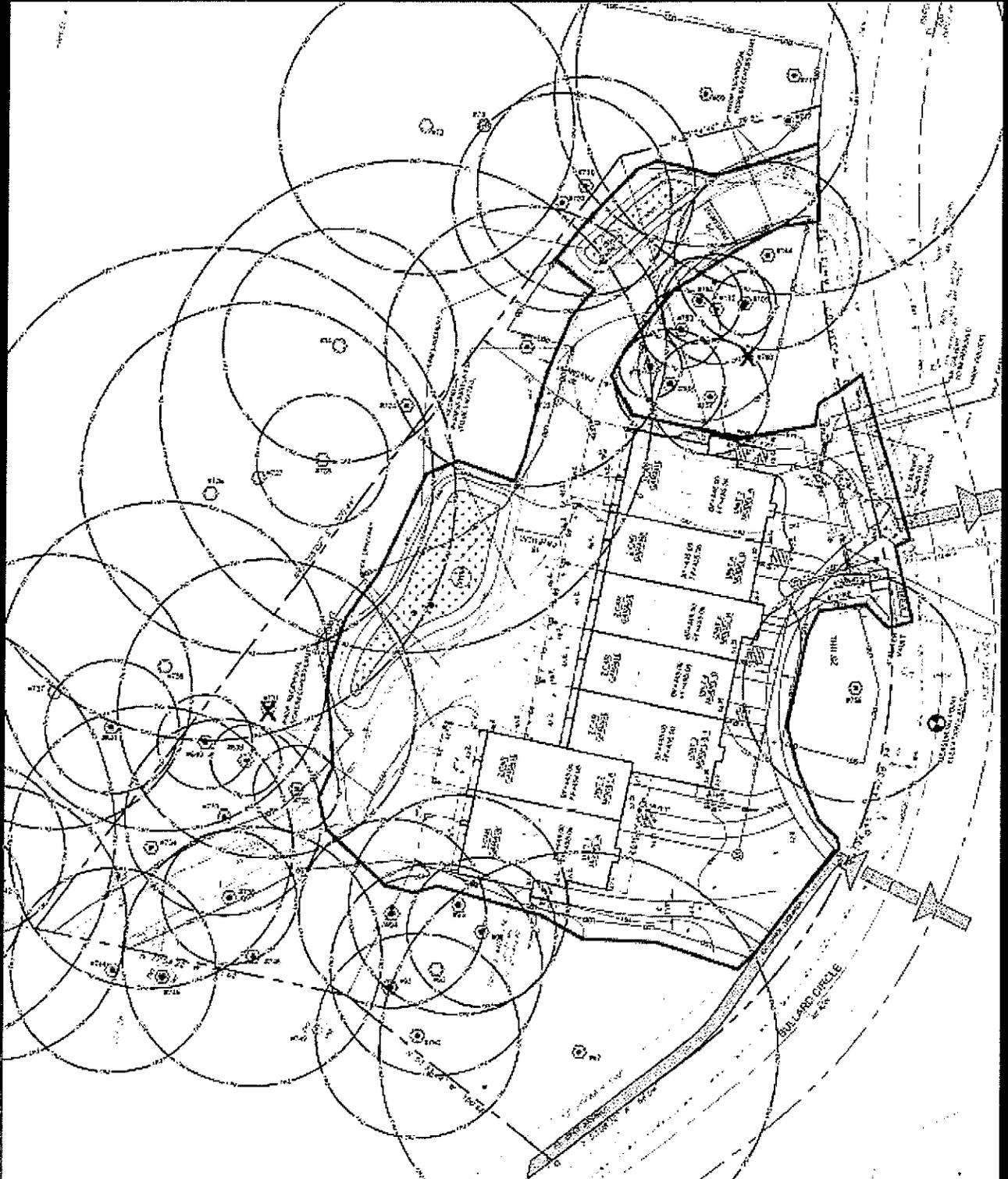
ATTACHMENT C

BUILDING DIMENSION TABLE

	MAY 2006 LAYOUT	NOVEMBER 2015 LAYOUT
LENGTH	145'	180'
WIDTH (NORTH)	61'	68'
WIDTH (SOUTH)	72'	68'
FOOTPRINT AREA	8,390 SF	11,150 SF

PROPOSED WOOD DECK

Amended Forest Conservation Plan





CHESTNUT LODGE

EAST ELEVATION

PARKER RODRIGUEZ INC.
Landscape Architecture Land Planning Urban Design
CREASER O'BRIEN
ARCHITECTS
100 MARKET ST. SUITE 2000
SAN FRANCISCO, CA 94102



Thank You

Questions?



Exhibit No. 17
Chestnut Lodge
PJT2015-00005

EDUCATION

Master of Architectural History, Concentration in Historic Preservation, University of Virginia, Charlottesville, Virginia, 1984

Bachelor of Arts in American Studies, Dickinson College, Carlisle, Pennsylvania, 1977

Facilitation Fundamentals, U.S. Institute for Environmental Conflict Resolution, 2011

Section 106 Advanced Seminar, Advisory Council on Historic Preservation, 2009

Training Course "Professional Development Program in Engineering for Older Buildings, including Heritage Buildings: Materials & Pathologies," Association for Preservation Technology & National Center for Preservation Technology and Training, 2003

Workshop "National Environmental Policy Act," University of Southern Maine, Summer Session Program, 1999

Workshop "Property Transfer Site Assessment Research Methods," Illinois State Museum, Springfield Illinois, 1992

Training Course "Historic Concrete: Investigation and Repair," Association for Preservation Technology, 1989

Training Course "Working With Section 106," Advisory Council on Historic Preservation and The Bureau of Land Management, 1988

London Summer School, The Victorian Society in America, 1980

Training Course "Wood Preservation Technology," Association for Preservation Technology, 1978

Historic Restoration and Preservation Technology Course Work, St. Lawrence College, Ontario, Canada, 1977

PROFESSIONAL ASSOCIATIONS

Member, Association for Preservation Technology; Member, International Council on Monuments and Sites; Member, Vernacular Architectural Forum; Member, Society of Architectural Historians.

PROFESSIONAL EXPERIENCE

Senior Vice President - Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1995 - Present

Vice President -- Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1991-1995

206

ATTACHMENT C

Assistant Vice President -- Architectural and Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland 1990 - 1991

Senior Project Manager, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, October 1989 - 1990

Architectural Historian, State of Nevada, Department of Conservation, Division of Historic Preservation and Archeology, State Historic Preservation Office, April 1984 - July 1989

Architectural Historian, Colorado Department of Highways, Project Development Branch, Denver, Colorado, October 1983 - March 1984

Architectural Historian, Community and Preservation Planning Consultants, Concord, New Hampshire, August 1981 - June 1982

Preservation Consultant, Stafford Rockingham Regional Council, Exeter, New Hampshire, June 1980 - August 1981

MANUSCRIPTS, PUBLICATIONS, AND PAPERS PRESENTED

- 1980a *Franklin Falls Historic District Nomination*. Franklin Falls, New Hampshire.
- 1980b *Cultural Resources of Rochester, New Hampshire*. Contributor, Survey Planning Report.
- 1981a *Plymouth Depot National Register Nomination*. Plymouth, New Hampshire.
- 1981b *Merchants Exchange*. Concord, New Hampshire. (HABS).
- 1981c *Rogers Garage*. Concord, New Hampshire. (HABS).
- 1982a *Boston Port Road Historic District Planning Report*. Rye, New York, Preservation planning study for National Register Historic District encompassing three estates on Long Island Sound.
- 1982b *Barret Hill Farm National Register District Nomination*. Wilton, New Hampshire.
- 1982c James Steam Mill Apartments, Historic Preservation Tax Certification Project, Newburyport, Massachusetts.
- 1982d Medical Clinic, Historic Preservation Tax Certification Project, Concord, New Hampshire.
- 1983a *Trinidad Foundry and Machine Company*. Trinidad, Colorado, (HAER).
- 1983b *Lime Kiln Near Morrison*. Morrison, Colorado (HAER).
- 1983c *Rooney Ranch*. Jefferson County, Colorado (HABS).
- 1984 *Midwest Iron & Steel Company*. Denver, Colorado, (HAER).
- 1985a The Architecture of Las Vegas, Nevada. Presentation sponsored by Nevada Humanities Committee and Nevada State Museum and Historic Society, Las Vegas, Nevada.

- ATTACHMENT C
- 207
1985b *Stewart Indian School Historic District Nomination.* Carson City, Nevada.
- 1987a *Multiple Resource Nomination of Buildings Designed by Frederick De Longchamps.* Washoe and Douglas Counties, Nevada.
- 1987b Speaker, "Oasis" Conference sponsored by Nevada Historical Society, Nevada
- 1988a Humanities Committee, Nevada State Council on the Arts, Nevada Division of Historic
- 1988b *Images of the Nineteenth-Century Agricultural Landscape, Nevada Historical Society Quarterly* Vol. XXXI, Winter 1988, No. 4.
- 1989a *Western Vernacular Architecture.* Museum Week lecture series, sponsored by Nevada State Museum and Historical Society, Carson City, Nevada.
- 1989b Preservation Workshop. Nevada State Museum and Historical Society, Las Vegas, Nevada.
- 1989c Walking Tour of Virginia City, Nevada. Sponsored by Historic Preservation Committee, Virginia City, Nevada.
- 1989d *Harmon School National Register Nomination.* Churchill County, Nevada.
- 1989e *Reed House National Register Nomination.* Gardnerville, Nevada.
- 1989f *Architectural Survey of the Planned Royersford Main Post Office, Montgomery County, Pennsylvania* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to the United States Postal Service, Facilities Service Center.
- 1989g *Elm Street School.* Frederick, Maryland (HABS).
- 1990a *Detailed Archeological and Architectural Investigations of the Tabard Village Project Area, Cedar Grove Complex (AA-881), and Archeological Site 18AN594, Anne Arundel County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to Classic Community Corporation.
- 1990b *Phase I and II Archeological Investigations of Bachelor's Hope Farm, St. Mary's County, Maryland* (with Martha Williams and Suzanne Sanders). Submitted to Archetype.
- 1990c *Phases I and II Archeological Investigations of the Frederick Municipal Golf Course, Frederick County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to City of Frederick, Maryland.
- 1990d *Archeological and Architectural Reconnaissance of the Suitland Federal Center, Prince Georges County, Maryland* (with Christopher R. Polglase, April Fehr, Michelle Therese Moran, and Janet S. Shoemaker). Submitted to Ward/Hall Associates, AIA.
- 1990e *Phase I Archeological Investigation at the Meadows, Baltimore County, Maryland,* (with R. Christopher Goodwin and Suzanne L. Sanders). Submitted to The Macks Group.
- 1990f *Phase I Archeological Investigations of Billingsley Road, U.S. Route 301 to the Charles County Sanitary Landfill No. 2, Waldorf, Maryland,* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Whitman, Requardt and Associates.

208

ATTACHMENT C

- 1990g *A Study of Secondary Impacts to Historic Resources Resulting from Construction of the Proposed Montgomery County Resource Recovery Facility, Dickerson, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to ENSR Consulting and Engineering.
- 1990h *Architectural Survey of the Planned Oakmont Green Development, Carroll County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Mary Kendall Shipe). Submitted to Oakmont Green Limited Partnership.
- 1991a *Phase I Archeological Survey and Architectural Investigation of the Proposed 7-Mile BG&E Dublin Extension Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Michelle Moran, Mary K. Shipe, and Martha R. Williams). Submitted to Biohabitats.
- 1991b *Phase I Archeological Survey and Architectural Investigation of the Proposed 24-Mile BG&E Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Martha R. Williams, Mary K. Shipe, and Peter Morrison). Submitted to Biohabitats.
- 1991c *Architectural Investigations of the Routzahn Home Farm, Frederick County, Maryland* (with R. Christopher Goodwin, Deborah Cannan, and Michelle T. Moran). Submitted to Allegheny Power System.
- 1991d *Historical and Architectural Investigations of the Humphrey Wolfe Farm Howard County, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Cattail Creek Country Club.
- 1991e *Architectural History Investigations of the Washington National Airport Surveillance Radar Facility, Washington, D.C.* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Information Systems and Network Corporation.
- 1991f *Architectural Recordation for Three Buildings Maryland Library for the Blind and Physically Handicapped, Baltimore, Maryland.* Submitted to Ayers Saint Gross.
- 1991g *Phase I Archeological Investigations and Architectural Reconnaissance Survey of the BG&E Utility Corridor from Herald Harbor Road to Maryland Route 3, Anne Arundel County, Maryland* (with R. Christopher Goodwin, Christopher R. Polglase, William R. Henry, and Michelle T. Moran). Submitted to Baltimore Gas & Electric Company.
- 1991h *Suitland Federal Center Historic Preservation Compliance Section 110 and 106 Compliance Prince Georges County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Deborah Cannan). Submitted to Ward/Hall Associates AIA.
- 1991i *Combined Phase I and Phase II Archeological Investigations of Centre 9500, Howard County, Maryland* (with R. Christopher Goodwin, Suzanne L. Sanders, and Michelle T. Moran). Submitted to Land Design Engineering, Inc.
- 1991j *Archeological and Architectural Investigations at Camden Yards, Baltimore, Maryland* (with R. Christopher Goodwin, Elizabeth Pena, and Suzanne M. Sanders). Submitted to the Maryland Stadium Authority.
- 1991k *HABS Recordation of Six Buildings Located within the Uptown National Register Historic District, New Orleans, Louisiana* (with Susan Barrett-Smith). Prepared for the United States Postal Service.

210

ATTACHMENT C

- 1993d The Rehabilitation of Mount Aventine Case Study presented to the Charles County Historical Trust.
- 1993e *Historical and Architectural Documentation of the Mississippi Basin Model, Clinton, Mississippi* (with Martha Williams and Bethany Usher). Report submitted to the Vicksburg District, U.S. Army Corps of Engineers.
- 1993f *Architectural Investigations Undertaken in Conjunction with the Base Realignment of Dahlgren Division, Naval Surface Warfare Center, Dahlgren, Virginia* (with Brooke V. Best and Leo Hirrel). Submitted to the Naval Facilities Engineering Command.
- 1993g *Historical Resource Study - Oxon Cove Park* (with Michelle T. Moran, Hugh McAloon and Peter Morrison). Report submitted to National Capital Park/East, National Park Service.
- 1993h *Fort George G. Meade - Cultural Resource Management Plan* (with Hugh McAloon, John Mintz, Martha Williams, Kathleen Child, and Leo Hirrel). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993i *Conditions Analyses and Preservation Treatment Recommendations for Historic Brick Buildings at Aberdeen Proving Ground* (with Brooke V. Best). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993j *Phase I Archeological Survey and Architectural Investigations of the Proposed Delmarva Power & Light Company, Easton-Steele 138 kV Transmission Line, Maryland* (with Michael A. Simons, Geoffrey E. Melhuish, W. Thomas Dod, and Christopher R. Polglase). Submitted to Delmarva Power & Light Company.
- 1993k *An Architectural History of St. Vincent De Paul Church, 120 North Front Street, Baltimore, Maryland* (with Michelle T. Moran and Martha R. Williams). Submitted to the St. Vincent de Paul Church.
- 1994a *Architectural and Historic Investigations for Four Former Defense Sites in Mississippi* (with Hugh B. McAloon and Leo Hirrel). Submitted to the U.S. Army Corps of Engineers, Vicksburg District.
- 1994b *Architectural Investigations Undertaken in the Dahlgren Residential Area, Naval Surface Warfare Center Dahlgren, Virginia* (with Brooke V. Best, Eliza Edwards, Leo P. Hirrel, and Patrick Jennings). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994c *Architectural Assessment of Buildings 296 and 297 Naval Hospital Cherry Point, North Carolina*. Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994d *Architectural Survey and Assessment of the DuPont Factory Structures at the Fleet and Industrial Supply Center, Cheatham Annex, York County, Virginia* (with Katherine Grandine and Hugh McAloon). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994e *Inventory of Standing Structures within the Operations and Industries Area at the Dahlgren Laboratory of the Dahlgren Division, Naval Surface Warfare Center* (with Brooke V. Best and Leo P. Hirrel). Submitted to the Naval Facilities Engineering Command, Atlantic Division).
- 1994f *National Historic Context for Department of Defense Installations, 1790 - 1940* (with Deborah K. Cannan, Leo Hirrel, Katherine E. Grandine, Bethany M. Usher, Hugh B. McAloon, and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.

- 211 ATTACHMENT C
1994g *Phase I Cultural Resource Investigations Undertaken at the U.S. Army Reserve Area Maintenance Support Activity (AMSA) Clarksburg, WV* (with Eliza H. Edwards, Suzanne L. Sanders, Leo P. Hirrel, and Hugh McAloon). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994h *Historic Context for Department of Defense Facilities World War II Permanent Construction* (Principal Investigator; by Deborah K. Cannan, Leo P. Hirrel, William T. Dod, and J. Hampton Tucker). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994i *Navy Cold War Guided Missiles Context: Resources Associated with the Navy's Guided Missile Program, 1946 - 1989* (with Brooke V. Best, Eliza Edwards, and Leo Hirrel). Submitted to the Department of the Navy, Atlantic Division, Naval Facilities Engineering Command.
- 1994j *Historic Context for the Army Material Command's World War II Facilities* (with Deborah K. Cannan, Leo Hirrel, Hugh McAloon, and Brooke V. Best). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1995a *Supplemental Cultural Resource Investigations to the Cultural Resource Management Plan, Aberdeen Proving Ground: Cultural Resource Procedures and Guidelines* (with Geoffrey Melhuish and Katherine Grandine). Submitted to the Atlantic Division, Naval Facilities Engineering Command.
- 1995b *Carlisle Indian Industrial School*. Brochure prepared with William P. Giglio and William McNamee. Submitted to the U.S. Army Research Laboratory and Carlisle Barracks.
- 1995c *St. Vincent de Paul and Baltimore: The Story of a People and Their Home* (with Thomas W. Spalding). Maryland Historical Society, Baltimore, 1995.
- 1995d *Monograph on Black Walnut Rural Historic District* (with Brooke V. Best and Hugh McAloon). Submitted to Old Dominion Electric Cooperative.
- 1995e *Architectural Investigations of the Dudderar Farm, Frederick County, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and Hugh B. McAloon). Submitted to the Ward Corporation.
- 1995f *HAER Documentation of the Kelly-Springfield Tire Plant, Cumberland, Maryland* (Principal Investigator). Prepared for the Allegany County Commissioners, Cumberland, Maryland.
- 1996a *Historical and Architectural Documentation of the Elmer Wolfe High School* (with Deborah Whelan). Submitted to Carroll County Public Schools, Westminster, Maryland.
- 1996b *Mason Row Maintenance Plan and National Register Documentation, Naval Weapons Station, Yorktown, Virginia* (with Katherine Grandine, Hugh McAloon, and Brooke V. Best). Submitted to Naval Facilities Engineering Command.
- 1996c *Historic American Building Survey Documentation: 5900-5910 Dalecarlia Place, Washington Aqueduct* (Principal Investigator; by Lori B. O'Donnell). Prepared for U.S. Army Corps of Engineers, Baltimore District.
- 1996d *Cultural Resource Investigations at Bayou Rapides Drainage Structure and Pumping Plant, Alexandria, Louisiana* (Principal Investigator; by Hugh McAloon). Submitted to U.S. Army Corps of Engineers, Vicksburg District.

212

ATTACHMENT C

- 1996e *HAER Recordation of Naval Surface Warfare Center Carderock Buildings 7, 11, 12, 13, 138, 139, 157* (Principal Investigator; by Geoffrey Melhuish). Submitted to Engineering Field Activity-Chesapeake, Washington D.C.
- 1996f *Architectural Investigations for the Wedgewood Industrial Park*. Submitted to Parker, Cade & Large, Inc., Millersville, Maryland.
- 1996g *Langley Air Force Base Cultural Resource Management Plan* (Principal Investigator; by Brooke V. Best, Martha Williams, and Lex Campbell). Submitted to the U. S. Army Corps of Engineers, Baltimore District.
- 1996h *Documentation of Bowie Tobacco Barn, Westwood Property, Prince George's County, Maryland* (Principal Investigator). Prepared for Donatelli & Klein, Inc.
- 1997a *Cultural Resources Investigations for Alignment and Environmental Studies, Halfway Boulevard Extended and Newgate Boulevard (PUR-577), Washington County, Maryland* (with April L. Fehr, Martha Williams, W. Patrick Giglio, and Ellen Saint Onge). Prepared for KCI Technologies.
- 1997b *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and April L. Fehr). Submitted to Engineering Field Activity - Chesapeake.
- 1997c *Revised National Register Documentation for "Guilford", Frederick County, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for Clagett Enterprises, Inc.
- 1997d *Navy Cold War Communication Context: Resources Associated with the Navy's Communication Program, 1946-1989* (Principal Investigator; by Brooke V. Best, Katherine Grandine, and Stacie Y. Webb). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997e *Intensive Architectural Survey at Naval Base Norfolk, Virginia* (Principal Investigator; by Katherine E. Grandine). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997f *Washington Aqueduct Cultural Resource Management Plan* (Principal Investigator; by Eliza E. Burden and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1997g *Architectural Investigations of St. Juliens Creek Annex* (Principal Investigator; by Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997h *Architectural Scoping Study: The Villages at Urbana, Frederick County, Maryland* (with Geoffrey L. Melhuish). Submitted to Monocacy Land Company, L.L.C.
- 1997i *Architectural and Historic Evaluation, U.S. Naval Air Station Keflavik, Keflavik, Iceland* (Principal Investigator; by Brooke V. Best, Geoffrey E. Melhuish, and Thomas W. Davis). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1997j *Dalecarlia Water Treatment Plant Historic American Engineering Record Documentation and Dalecarlia Employee Dwellings Historic American Building Survey Documentation* (with Lori O. Thursby). Prepared for Baltimore District, U.S. Army Corps of Engineers.

- 213 ATTACHMENT C
- 1997k *Architectural Impact Assessment for the Bethesda Trolley Trail, Bridges Over I-495 and I-270* (with Lex F. Campbell). Prepared for Hurst-Rosche Engineers, Inc.
- 1997l *Supplemental Phase I Archeological Investigations for the Proposed Storm Water Retention Pond, Naval Surface Warfare Center Carderock, Montgomery County, Maryland* (Principal Investigator; by April L. Fehr and Andrew D. Madsen). Prepared for Engineering Field Activity -Chesapeake, Washington, D.C.
- 1997m *Addendum Report to Phase I Archeological and Architectural Investigations for the Monrovia Wastewater Treatment Plant, Frederick County, Maryland* (with Geoffrey E. Melhuish and April L. Fehr). Prepared for Frederick County Department of Public Works.
- 1997n *Center of Military History, U.S. Army Ordnance Museum, Outdoor Ordnance Collection at Aberdeen Proving Ground, National Register Nomination* (Principal Investigator; by Katherine Grandine and Jane Armstrong). Prepared for Aberdeen Proving Ground and Baltimore District, U.S. Army Corps of Engineers.
- 1997o *HABS Recordation of Stephen J. Barbre Middle School, Kenner, Louisiana*. Submitted to Southeast Regional Office, National Park Service.
- 1997p *Architectural Survey and Impact Assessment for the Proposed Royal Oaks Subdivision, New Market, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for NML Corporation.
- 1997q *Architectural Evaluations of Properties I and IV for the Washington Gas Company Pipeline, Prince George's and Charles Counties, Maryland* (Principal Investigator; by Lori O. Thursby). Prepared for Stone & Webster Environmental Technology & Services.
- 1997r *Architectural Documentation of the Guilford Tenant House, Frederick, Maryland* (Principal Investigator; by Lex Campbell). Prepared for Claggett Enterprises, Inc.
- 1997s *Object Inventory, Edgewood Area, Aberdeen Proving Ground Summary Report* (with Katherine Grandine and Jane Armstrong). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1997t *Architectural Investigation of St. Timothy's School, Baltimore County, Maryland* (with Lex Campbell and Jane Armstrong). Prepared for St. Timothy's School, Stevenson, Maryland.
- 1997u *Historic American Buildings Survey Documentation: Abbey Mausoleum and Washington Navy Yard Buildings 28, 142, 143, 198, 201, 104, and 197* (Principal Investigator; by Katherine Grandine and Geoffrey Melhuish). Prepared for Engineering Field Activity - Chesapeake.
- 1997v *Architectural Investigations of the Pettingall/Bussard Farm, Frederick County, Maryland* (Principal Investigator; by W. Patrick Giglio and Jane Armstrong). Prepared for Maryland National Golf Club.
- 1997w *Architectural Resources Survey of 3,700 Acres, Naval Security Group Activity, Northwest, Chesapeake, Virginia* (Principal Investigator; by Brooke V. Best). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997x *Historic Preservation Plan: United States Naval Academy, Annapolis, Maryland* (Co-Principal Investigator; by Lex Campbell, John Seidel, and Martha Williams). Prepared for Engineering Field Activity - Chesapeake.

214

ATTACHMENT C

- 1997y *Preservation Analysis of the Derr House, Frederick, Maryland* (Principal Investigator). Prepared for Natelli Associates, Inc.
- 1998a *Architectural Analysis of Gateway Park Development, Prince George's County, Maryland* (Principal Investigator). Prepared for Federal Realty Investment Trust.
- 1998b *Intensive Level Architectural Survey at Naval Surface Warfare Center, Carderock Division, Annapolis Detachment, Annapolis, Maryland* (Principal Investigator; by Geoffrey Melhuish and Lori O. Thursby). Submitted to the Department of the Navy, Engineering Field Activity-Chesapeake:
- 1998c *Historic American Engineering Record Documentation: Caryville Bridge, Holes and Washington Counties, Florida* (Principal Investigator; by Lex Campbell, Brooke Best, and Michael Godzinski). Prepared for Florida Department of Transportation.
- 1998d *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Elaine Kiernan and Lex Campbell). Prepared for Engineering Field Activity - Chesapeake, Washington Navy Yard.
- 1998e *Mason Row National Register Nomination, Naval Weapons Station Yorktown, Yorktown, Virginia* (Principal Investigator; by Katherine Grandine). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998f *Architectural Investigations at Naval Station Roosevelt Roads, Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998g *MHT Documentation for the Gay Street Historic District* (Principal Investigator; by Elaine Kiernan). Prepared for Maryland Department of General Services.
- 1998h *Aberdeen Proving Ground Cold War Era Historic Context* (Principal Investigator; by Katherine Grandine). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1998i *Architectural Investigations at Marine Corps Air Station Cherry Point, North Carolina* (Principal Investigator; by W. Patrick Giglio, Brooke Best, Lex Campbell, and Hugh McAloon). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998j *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey Melhuish and April Fehr). Prepared for Engineering Field Activity - Chesapeake.
- 1998k *Architectural Survey and Assessment of Naval Amphibious Base, Little Creek, Virginia Beach, Virginia* (Principal Investigator; by Lex F. Campbell and Lori B. O'Donnell). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998l *Historical Assessment of the Laurel Machine Shop, Laurel, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Chester Engineers.
- 1998m *Architectural Inventory of Norfolk Naval Shipyard and Satellite Activities, Norfolk, Virginia* (with Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to the Naval Facilities Engineering Command, Atlantic Division.

ATTACHMENT C

- 215
1998n *Wyoming Valley Levee Raising Project: Intensive Architectural Survey in the Susquehanna River Valley* (Principal Investigator; with Katherine Grandine, Elaine Kiernan, and Jane Armstrong). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998o *Architectural Investigations of the Proposed Villages of Urbana Planned Urban Development (PUD) Frederick County, Maryland* (Principal Investigator; by Geoffrey Melhuish). Prepared for Monocacy Land Co., L.L.C.
- 1998p *Phase III Jackson Historic Resources Survey* (Principal Investigator; by Lex Campbell and Sheila Lewis). Prepared for City of Jackson, MS.
- 1998q *Chemical Area Storage Yard (CASY), Aberdeen Proving Ground, Edgewood Area, MHT Historic Properties Inventory Form* (Principal Investigator; with Katherine Grandine). Prepared for Dynamac Corporation.
- 1998r *Maryland Historical Trust State Historic Sites Inventory Form for Building Numbers 115, 123, 132, 144, and 153, Naval Surface Warfare Center, Carderock Division* (Principal Investigator; by Lex Campbell). Prepared for Naval Surface Warfare Center, Carderock Division.
- 1998s *Supplemental Architectural Investigations, Determination of Eligibility Documentation for Select Buildings, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Lex Campbell, W. Patrick Giglio, and Elaine Kiernan). Prepared for Engineering Field Activity – Chesapeake.
- 1998t *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR), Chesterfield County, Virginia* (Co-Principal Investigator with Ann Markell; Brooke Best, Bradley McDonald, Ann Markell, Henry Measells, and Brian Clevon). Prepared for Mill Creek Environmental Consultants, Ltd.
- 1998u *Phase I Architectural Survey and Archeological Investigations at Naval Communication Detachment Cheltenham, Prince George's County, Maryland* (Principal Investigator with Christopher R. Polglase; April Fehr and Katherine Grandine). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998v *Integrated Cultural Resources Management Plan, US Army Garrison, Fort Belvoir, Virginia* (Co-Principal Investigator with Christopher R. Polglase; Brooke Best, W. Patrick Giglio, and Martha Williams). Submitted to Dewberry & Davis on behalf of the Environmental & Natural Resources Division, Fort Belvoir, Virginia.
- 1999a *Architectural Survey and Assessment of Naval Air Station Oceana and Naval Auxiliary Landing Field Fentress, Virginia* (Principal Investigator; by Geoffrey E. Melhuish). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1999b *Archival and Architectural Investigations at Naval Station Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke V. Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Naval Facilities Engineering Command.
- 1999c *Architectural Survey of NSGA Sabana Seca, Sabana Seca, Puerto Rico* (Principal Investigator; by Brooke V. Best). Prepared for Atlantic Division, Naval Facilities Engineering Command.

216

ATTACHMENT C

- 1999d 800 Carroll Parkway, Frederick, Maryland, National Register Nomination (Principal Investigator; by Katherine Grandine). Prepared for Stuart/Grey Corporation.
- 1999e *Architectural Reconnaissance Survey of the Proposed Beech Tree Development, Prince George's County, Maryland* (Principal Investigator; by Katherine Grandine, Elaine Kiernan, and Brian Clevon). Prepared for Ryko Development, Inc.
- 1999f National Register of Historic Places Registration Form for Florida Avenue Siphon, New Orleans, Louisiana (Principal Investigator; by Brian Clevon and Ralph Draughon). Prepared for U.S. Army Corps of Engineers, New Orleans District.
- 1999g *Indian Head Division, Naval Surface Warfare Center, Historic and Archeological Resource Protection Plan* (Principal Investigator; by Thomas W. Davis). Prepared for Engineering Field Activity-Chesapeake.
- 1999h *Historic American Engineering Record Documentation: Florida Avenue Bridge, New Orleans, Louisiana* (with Brian Clevon and Ralph Draughon). Prepared for the United States Coast Guard Eighth Coast Guard Division.
- 1999i *Archeological Evaluation of Dudderar Farm (18FR729), Urbana, Frederick County, Maryland* (with Sonja Ingram, Hugh McAloon, and Geoffrey Melhuish). Submitted to Monocacy Land Company, LLC.
- 1999j *Architectural Inventory of New Jersey Army National Guard Facilities* (Principal Investigator; by Elaine K. Kiernan). Prepared for Southwest Missouri State University.
- 1999k *Interim Report on Architectural Reconnaissance Survey of the Proposed Independence Pipeline Corridor through Lawrence, Butler, Armstrong, Clarion, Jefferson, Forest, and Elk Counties, Pennsylvania* (Principal Investigator; by Elaine Kiernan, Patrick Giglio, Brooke Best, and Martha Williams). Submitted to ANR Pipeline Company.
- 1999l *Architectural Evaluation of the Farmstead on Rosenstock North Farm* (Principal Investigator; by Katherine Grandine). Submitted to Buckeye Development Construction Company, Inc.
- 1999m Visual Impact Assessment for Hunters Brooke Subdivision. Submitted to Universal Development Company, LLC.
- 1999n National Register Evaluation of the Claiborne Storehouse (Principal Investigator; by Katherine Grandine and Ralph Draughon). Submitted to New Orleans District, U.S. Army Corps of Engineers.
- 1999o *Architectural Documentation of the Sebastian Derr House, Frederick, Maryland* (Principal Investigator; with Katherine Grandine, W. Patrick Giglio, Brian Clevon, and Barry Warthen). Submitted to Natelli Communities.
- 1999p *Letter Report for MD 18: U.S. 301 to Greenspring Road, Queen Anne's County, Maryland* (Principal Investigator; with Katherine E. Grandine, W. Patrick Giglio, and Justin Edgington). Submitted to Maryland Department of Transportation.
- 1999q *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; with W. Patrick Giglio). Submitted to U.S. Army Corps of Engineers, Baltimore District.

ATTACHMENT C

- 217
1999r *Architectural and Historical Assessment of 9150 Darnestown Road, Rockville, Maryland* (Principal Investigator; with Brian Cleven and Katherine Grandine). Prepared for Dr. Bor-Chung Lee through Miller, Miller, & Canby, Rockville, Maryland.
- 1999s *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR)* (Principal Investigator with Ann Markel; with Brooke Best, Henry Measells, and Brian Cleven). Prepared for Mill Creek environmental Consultants, Ltd., Hampton, Virginia,
- 1999t *Architectural and Historical Evaluation of the Kelly-Brewser House, 1853 Reisterstown Road, Pikesville, Maryland.* Prepared for Southwood Holding Corporation, Baltimore, Maryland.
- 1999u *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; with Elaine K. Kiernan and Lex Campbell). Submitted to Department of the Navy, EFA Chesapeake.
- 2000a *Letter Report for Frederick House (BA-1206)* (Principal Investigator; with Katherine Grandine). Submitted to Mr. Arthur S. Tracey Personal Representative Eda Ensor Estate.
- 2000b *Rehabilitation Analysis of the Edward Campbell Farmstead, Frederick, Maryland* (Principal Investigator; with W. Patrick Giglio and Brian Cleven). Submitted to Millennium Development Group, L.L.C.
- 2000c *Integrated Cultural Resource Management Plan: Naval Surface Warfare Center, Carderock Division* (Principal Investigator; with April L. Fehr and Brooke V. Best). Submitted to Naval Surface Warfare Center.
- 2000d *Historic American Engineering Record Documentation: Galvez Street Wharf, New Orleans, Louisiana* (Principal Investigator; by Brian Cleven). Submitted to United States Coast Guard.
- 2000e *Integrated Cultural Resource Management Plan, United States Naval Academy, Annapolis, Maryland* (Principal Investigator; by Lex Campbell, John L. Seidel, and Martha R. Williams). Prepared for Engineering Field Activity – Chesapeake.
- 2000f *Campbell Farmstead (F-8-23) Addendum to Maryland Inventory of Historic Properties Form* (Principal Investigator; by Katherine E. Grandine and Brian Cleven). Prepared for Riverside Investment Group, LLC.
- 2000g *Architectural Recordation of Frederick Memorial Hospital and Nurses' Home, Frederick Maryland* (Principal Investigator; by Justin Edgington and Katherine E. Grandine). Prepared for Frederick Memorial Hospital.
- 2000h *Evaluation of National Register Eligibility of Bayou Boeuf, Bayou Sorrel, and Berwick Locks and the Calumet and Charenton Floodgates in the Atchafalaya Basin, Louisiana* (Principal Investigator; by Brian Cleven and Brooke V. Best). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000i *Historic American Engineering Record Documentation: Rock Creek Trestle, Montgomery County, Maryland* (Principal Investigator; by Brian Cleven). Prepared on behalf of Hurst-Rosche Engineers, Inc. for Montgomery County Department of Public Works and Transportation.

218

ATTACHMENT C

- 2000j *Historic American Engineering Record Documentation: Keystone Lock and Dam, St. Martinville, Louisiana* (Principal Investigator; by Brian Clevén). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000k *National Register Assessment of the Lock Keepers Dwelling at the Keystone Lock and Dam, St. Martin Parish, Louisiana* (with Brian Clevén). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000l *Architectural Inventory of the Gordon Building, 57 South Market Street, Frederick, Maryland* (Principal Investigator; by Brian Clevén and Nathaniel Patch). Prepared for the City of Frederick, Maryland.
- 2000m *Village on Falling Spring Transportation Enhancement Project, Borough of Chambersburg, Franklin County, Pennsylvania*. Prepared for Gannett Fleming, Inc.
- 2000n *Maryland Inventory of Historic Property Form: Birkhead House, 23629 Woodfield Road, Montgomery County* (Principal Investigator; with Katherine Grandine). Prepared for Iko Development, Inc.
- 2000o Speaker. *Tools for Preservation Planners*. Preservation and Revitalization Conference, Preservation Maryland.
- 2000p *Analysis of Regulations for Compliance with Section 106 of the National Historic Preservation Act of 1966, as Amended* (with April Fehr). Submitted to The INGAA Foundation, Inc.
- 2000q *Historical and Architectural Investigation of Memorial Stadium, Baltimore, Maryland* (with Brian Clevén). Prepared for Maryland Stadium Authority, Baltimore, Maryland.
- 2000r *Documentation of Federated Charities Building, 22 South Market Street, Frederick, Maryland* (Principal Investigator with Brian Clevén, Katherine Grandine, Justine Edgington, and Barry Warthen). Prepared for Federated Charities Corporation of Frederick.
- 2000s Sheffer House, Middletown, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000t Francis Scott Key Hotel, Frederick, Maryland. Federal Historic Rehabilitation Tax Certification prepared for Struever Bros., Eccles & Rouse, Inc.
- 2000u Thomas Cannery, Montgomery County, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Rockville Fuel and Feed.
- 2000v *National Register Nomination for the Sheffer House* (Principal Investigator; with Katherine Grandine). Prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000w *Study of Building Ornamentation at Langley Air Force Base, Langley, Virginia* (Principal Investigator; with Katherine Grandine and Justine Edgington). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 2000x *Marketing Prospectus for the Edward Campbell Farm, Frederick, Maryland*. Prepared for Millennium Development Corporation.

219

ATTACHMENT C

- 2000y *MD 26: Liberty Reservoir to MD 32, Carroll County, Maryland, Project No. CL850B11* (Principal Investigator; with Katherine Grandine). Prepared for the Maryland State Highway Administration.
- 2001a *Communications Tower Sites in Frederick County Maryland – Murphy Farm and Buffington Farm.* Assessment prepared for Sprint PCS.
- 2001b *Fairview (71A-13) Environmental Setting.* Letter report prepared for the Prince George's County Planning Department.
- 2001c *National Register Assessment of the Broadmoor Neighborhood* (with Katy Coyle). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001d Speaker. *Symposium on the Management of Capehart-Wherry Era Housing.* Department of the Army.
- 2001e *Energy Panel.* Task Force on Energy, Advisory Council on Historic Preservation Meeting, San Francisco, California.
- 2001f *Aberdeen Proving Ground Integrated Cultural Resources Management Plan.* (Principal Investigator with Christopher R. Polglase; with Katherine Grandine and Thomas W. Davis) Submitted to Advanced Technology Systems, Inc.
- 2001g *Historic American Engineering Record Documentation: St. Claude Bridge, New Orleans, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001h *Historic American Engineering Record Documentation: Inner Harbor Navigation Canal Lock, New Orleans, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001i *Supplemental Architectural and Historical Investigations for the Proposed Duke Energy Facility on the Vernon-Hines and Urciolo Properties, Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001j *Jesup Blair House and Park, Montgomery County, Maryland, Maryland Inventory of Historic Properties Form* (Principal Investigator; with Kirsten Peeler). Prepared for Montgomery College.
- 2001k *Phase I Archeological Survey for the Proposed Duke Energy North America (DENA), LLC Powerplant, German Township, Fayette County, Pennsylvania (Pennsylvania Environmental Report #2001-1219-051-C)* (with Jesse Kulp, Peter Holmes, Brian Clevon, Katherine Grandine, Michael Hornum, and Scott Meacham). Prepared for CH2M Hill.
- 2001l *Archeological and Historical Investigations for the Proposed Duke Energy Facility on the Offutt Property, Frederick, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, Scott Meacham, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001m *Architectural Investigation of Buildings and Structures at the Naval Surface Warfare Center Carderock Division Memphis Detachment, Memphis, Tennessee* (Principal Investigator; by Scott Meacham and Katherine Grandine). Prepared for Public Works Department.

220

ATTACHMENT C

- 2001n *Historic Context for Army Fixed-Wing Airfields 1903-1989* (Principal Investigator; by Katherine Grandine, Brian Clevon, Thomas W. Davis, and Nathaniel Patch). Prepared for U.S. Army Environmental Center.
- 2002a *Historic Properties Report on Hangars 745, 755, and 756, Langley Air Force Base, City of Hampton, Virginia VDHR File No. _____* (Principal Investigator; by Katherine Grandine and Brian Clevon). Prepared for Science Applications International Corporation (SAIC).
- 2002b *Evaluation of the National Register Eligibility of Calcasieu Lock, Calcasieu Parish, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for U.S. Army Corps of Engineers.
- 2002c *Historic American Buildings Survey Documentation: Fort Monroe, Buildings 65, 66, 67, 68, 69, 70, and 79* (Principal Investigator; by Katherine Grandine). Prepared for DPW Environmental Office.
- 2002d *HABS/HAER Level II Documentation of the Paint and Oil Storehouse (Building No. 216), Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Carrie Albee). Prepared for Naval Air Station Patuxent River.
- 2002e *Maryland Historical Trust Architectural Inventory Documentation Duke Energy North America Facility in Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2002f *Archival, Architectural, and Geophysical Remote Sensing Investigation at the Montevue Property, Frederick County, Maryland* (Principal Investigator with Christopher R. Polglase; by William Lowthert IV, Scott Meacham, Nate Patch, Brian Clevon, Jean B. Pelletier, and Katherine Grandine). Prepared for the Frederick County Department of Public Works.
- 2002g *Middletown Primary School Site Assessment, Middletown, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Frederick County Public Schools.
- 2002h *Research Design for Cultural Resource Assessment of Six State Parks, State Owned Cultural Resource Assessment Program, Department of Natural Resources Pilot Study* (Principal Investigator with Christopher R. Polglase; by Katherine E. Grandine, Jeffrey H. Maymon, and Martha Williams). Prepared for Maryland Historical Trust.
- 2002i *Archeological, Historical, and Architectural Reconnaissance Study of Crab Cay, Exuma Island, The Bahamas* (with Suzanne L. Sanders, R. Christopher Goodwin, and Jennifer A. Brown). Prepared for Islands By Design Ltd.
- 2002j *Baltimore East/South Clifton Park Historic District National Register Nomination* (Principal Investigator; by Katherine E. Grandine, Brian Clevon, Kirsten G. Peeler, Carrie Albee, and Nathaniel S. Patch). Prepared for Center Development Corporation.
- 2002k *Charity Ellen Frazier Farm Assessment, Knoxville, Maryland* (Principal Investigator; by Brian Clevon and Christine Heidenrich). Prepared for Hailey Development LLC.
- 2002l *HABS/HAER Level II Documentation of Boat House No. 2 (Building 214) Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Naval Air Station Patuxent River.

- ATTACHMENT C
- 221
- 2003a *Unaccompanied Personnel Housing (UPH) during the Cold War (1946-1989)* (Principal Investigator; with Brian Cleven, Nathaniel Patch, Katherine Grandine, and Christine Heidenrich). Prepared for the U.S. Army Environmental Center.
- 2003b *Neighborhood Design Guidelines for Army Wherry and Capehart Family Housing* (Principal Investigator; by Kirsten Peeler and Reid Wraase) Prepared for the Department of the Army.
- 2003c *Housing an Army: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962) Historic Context* (Principal Investigator; with Kirsten Peeler, Christine Heidenrich, Carrie Albee, and Katherine Grandine). Prepared for the Department of the Army.
- 2003d *Comus Inn National Register Nomination*. Prepared for the Comus Inn, Comus, Maryland.
- 2003e *Maryland Heritage Preservation & Federal Historic Preservation Certification Applications, Parts 1 & 2*. Prepared for the Comus Inn, Comus, Maryland.
- 2003f *Heritage Preservation Public Interpretation Kiosk* (Principal Investigator; with Reid Wraase and Christine Heidenrich). Prepared for Ikea, Inc.
- 2003g *Section 106 Effects Report, and Alternate Assessment for the Community Clinical and Behavioral Health Center, Baltimore, Maryland* (Principal Investigator; with Dr. R. Christopher Goodwin). Prepared for Kennedy Krieger Institute, Inc.
- 2003h *Historical and Architectural Investigations of Milcon P160, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Cleven). Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.
- 2004a *Determination of Eligibility Report Owens Property (Landing Road Cider Mill [MIHP #HO-420]), Howard County, Maryland* (Principal Investigator; by Brian Cleven, and Kathryn G. Smith). Prepared for The Keelty Company.
- 2004b *Maryland Heritage Preservation and Federal Historic Preservation Certification Applications. Parts 1, 2, & 3, Francis Scott Key Hotel, Frederick, Maryland*. Prepared for Struever Bros., Eccles & Rouse, Inc.
- 2004c *Draft Programmatic Agreement*. Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.
- 2004d *Architectural Survey for the Proposed Crown Landing Project Logan Township, Gloucester County, New Jersey and New Castle County, Delaware* (Principal Investigator; by Brian Cleven and Martha Williams). Prepared for Environmental Resource Management.
- 2004e *Historical and Architectural Investigation of 1950s-era Industrial Areas and Miscellaneous Buildings, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Cleven). Prepared for Indian Head Division, NSWC.
- 2004f *Determination of Eligibility Report; Feaga-Albaugh Farmstead, Frederick County, Maryland* (Principal Investigator; by Kathryn G. Dixon). Prepared for Horizon Frederick II LLC.
- 2005a *Determination of Eligibility Forms for Griffith's Adventure (Joshua F.C. Worthington House BA-0011)* (Principal Investigator; by Kirsten Peeler). Prepared for Whitney, Bailey, Cox & Magnani.

222

ATTACHMENT C

- 2005b *Determination of Eligibility Reports; Demarr Property (CH812), Quarles Property (CH-814), and Vliet Property (CH-813)* (Principal Investigator; by Kirsten Peeler, Kathryn Dixon, and Christine Heidenrich). Prepared for Whitman, Requardt and Associates, LLP.
- 2005c *Architectural Investigations for the Proposed Sudley Manor Drive Public-Private Transportation Act (PPTA), Prince William County, Virginia* (Principal Investigator; by Katherine Grandine and Martha Williams). Prepared for CH2M Hill.
- 2005d *Focused Literature Search – Naval Air Station Atlantic City* (Principal Investigator; by Dean Doerrfeld and Brian Cleven). Prepared for TRC Environmental Corporation.
- 2005e *Determination of Eligibility Report; Elmwood Farm, Washington County, Maryland MIHP No. WA-I-018* (Principal Investigator; by Kathryn G. Dixon and Kirsten Peeler). Prepared for Elmwood Farm Development, LLC c/o Terra Consultants, Inc.
- 2005f *An Addendum Report to Phase I Archeological Investigation of 15 Acres within the West Campus Shepherd University, Jefferson County, West Virginia* (Principal Investigator; by Dean A. Doerrfeld and Chris Heidenrich). Prepared for Shepherd University Facilities Management.
- 2005g *National Register of Historic Places Nomination for Spring Hill Farm, Loudoun County, Virginia* (Principal Investigator; by Dean Doerrfeld and Chris Heidenrich). Prepared for Larry Ritchie Williams.
- 2005h *National Register of Historic Places Nomination for Whiteford-Cardiff Historic District* (Principal Investigator; by Christine A. Heidenrich and Kirsten Peeler). Prepared for Whiteford, Pylesville, Cardiff Community Association, Inc.
- 2005i *Determination of Eligibility Form for Christian Kemp Farmstead (MIHP F-1-179)* (Principal Investigator; by Christine Heidenrich and Dean Doerrfeld). Prepared for Ausherman Development Corporation.
- 2005j *Gap Analysis, Mitigation for Cold War Era Unaccompanied Personnel Housing, World War II, and Cold War Era Ammunition Bunkers and Army Ammunition Plants* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Medical Research Acquisition Activity.
- 2005k *MIHP Form: PG:71-38, Bridge No. 16017, MD 450 Over CSX Railroad, Bowie, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland Department of Transportation.
- 2005l *Historic Context for Washington State Air National Guard* (with Kirsten Peeler, Dean A. Doerrfeld, and Christine Heidenrich). Prepared for Air National Guard Readiness Center.
- 2005m *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; by Katherine E. Grandine). Prepared for USAMRAA.
- 2005n *Environmental Assessment for the Disposition of Belle Chance Residence and Outbuildings, Andrews AFB, MD* (Principal Investigator; by Brian Cleven). Prepared for the Department of the Air Force.
- 2005o *World War I Barracks (E4400 Block) and Service Buildings at Edgewood Arsenal, Historical Documentation* (Principal Investigator; by Kathryn G. Dixon). Prepared for Aberdeen Proving Ground through U.S. Army Medical Research Acquisition Activity.

ATTACHMENT C

- 223
2005p *Determination of Eligibility Form for Bishop Field, United States Naval Academy* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for A. Morton Thomas Associates, Inc.
- 2005q *Maryland Determination of Eligibility Report for Lord Golf Project Fox Hall Farm* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for Lionheart Consulting.
- 2005r *Determination of Eligibility for Smith Farm (F-2-111)* (Principal Investigator; by Kirsten G. Peeler and Kathryn G. Dixon). Prepared for Jefferson Valley, LLC c/o Ausherman Development Corporation.
- 2005s *MIHP Form for Edgewood Area Industrial Area, Edgewood Area, Aberdeen Proving Ground, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Aberdeen Proving Ground.
- 2006a *BRAC/EIS Cultural Resources Support*. Prepared for Weston Solution, Inc.
- 2006b *Summary Report of Archival Research Department of the Navy Unaccompanied Personnel Housing (1946-1989) and Ammunition Storage Facilities (1939-1984)* (Principal Investigator; by Dean A. Doerrfeld).
- 2006c *Determination of Eligibility Form for Good Fellowship, MIHP #HO-190, Howard County, Maryland* (Principal Investigator; by Dean A. Doerrfeld). Prepared for Davis Branch LLC.
- 2006d *Housing an Air Force and a Navy: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962)* (Principal Investigator; by Kirsten Peeler, Christine Heidenrich, Katherine E. Grandine, and Dean A. Doerrfeld). Prepared for the United States Departments of the Air Force and Navy.
- 2006e *Maryland Inventory of Historic Properties Form: Feaga-Albaugh Farmstead, Frederick County, Maryland; MIHP No. F-3-226* (Principal Investigator; by Kathryn G. Dixon). Prepared for Cannon Bluff, LLLP.
- 2007a *Maryland Inventory of Historic Properties Form for Broadway Squares (B-5138) Baltimore City, Maryland* (Principal Investigator; by Kirsten Peeler, M.S.). Prepared for Madison Street Properties, Inc.
- 2007b *National Register Assessment of Buildings 7033, 7034, 7036, and 7215, Custer Hill Troop Area, Fort Riley, Kansas* (Principal Investigator; by Brian Clevon). Prepared for Fort Riley Kansas and U.S. Army Environmental Center.
- 2007c *Survey of the Architectural and Archeological Cultural Resources at the Virginia Air National Guard Installations at the Richmond International Airport, Henrico County and the State Military Reservation, Camp Pendleton, City of Virginia Beach, Virginia* (Principal Investigator; with Ann B. Markell, Katherine Grandine, and Nathan Workman). Prepared for ANGR/CEVP.
- 2007d *Army Ammunition and Explosives Storage During the Cold War (1946-1989)* (Principal Investigator; by Kathryn Dixon, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Christine Heidenrich, and Katherine E. Grandine). Prepared for USAEC.

224

ATTACHMENT C

- 2007e *Maryland Inventory of Historic Properties Addendums for 14 Properties* (Principal Investigator; by Brian Cleven and Kirsten Peeler). Prepared for H.B. Mellott Estate, Inc.
- 2007f *Army Ammunition Production During the Cold War (1946-1989)* (Principal Investigator; by Christine Heidenrich, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Katherine E. Grandine, Heather McMahon, and Benjamin Riggle). Prepared for USAEC.
- 2007g *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Blue Grass Army Depot, Richmond, Kentucky* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007h *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007i *Determination of Eligibility Forms for: Thomas W. Hall Farm (AA-2382) and Tobacco Farm on Johns Hopkins Road (AA-2383)* (Principal Investigator; by Kirsten Peeler). Prepared for McCrone, Inc.
- 2008a *Cultural Resources Survey, Architecture and Archeology, of Maine Air National Guard Installations at Bangor Air National Guard Base and South Portland Air National Guard Station, Penobscot and Cumberland Counties, Maine* (Principal Investigator with Ellen R. Cowie; with Jeffrey Maymon, Brian Cleven, Kathryn Dixon, Rebecca Gatewood, and Nathan S. Workman). Prepared for Air National Guard Readiness Center.
- 2008b *Cultural Resources Survey for Architecture and Archaeology of the Vermont Air National Guard Installation at Burlington International Airport, Chittendon County, Vermont* (Principal Investigator with Ann B. Markell; by Ann B. Markell, Kirsten Peeler, Christine Heidenrich, Martha Williams, and Nathan Workman). Prepared for Air National Guard Readiness Center.
- 2008c *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: White Sands Missile Range, White Sands, New Mexico* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008d *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Aberdeen Proving Ground, Aberdeen Maryland* (Principal Investigator; by Katherine Grandine). Prepared for U.S. Army Environmental Command.
- 2008e *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Louisiana Army Ammunition Plant, Minden Louisiana* (Principal Investigator; by Kirsten Peeler, Dean Doerrfeld, and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008f *Pinnacle Wind Project, Mineral County, West Virginia – Phase I Investigation for Architectural and Structural Resources* (Principal Investigator; by Rebecca J. Gatewood, Katherine Grandine, Chris Heidenrich, and Dean A. Doerrfeld). Prepared for Pinnacle Wind Force, LLC.
- 2008g *Army Ammunition Production During the Cold War Era – Site Report: Radford Army Ammunition Plant, Radford Virginia* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.

225

ATTACHMENT C

- 2008h *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Pine Bluff Arsenal, Pine Bluff, Arkansas* (Principal Investigator; by Katherine Grandine and Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008i *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008j *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Hawthorne Army Depot, Hawthorne, Nevada* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008k *Army Ammunition Production During The Cold War Era - Site Report: Iowa Army Ammunition Plant, Burlington, Iowa* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008l *Determination of Eligibility Form for Cricket Creek Farm (HO-480)* (Principal Investigator; by Kirsten Peeler). Prepared for Coscan/Adler Limited Partnership.
- 2008m *Programmatic Environmental Assessment for Site Selection, Veterans Affairs Medical Center (VAMC) and Louisiana State University Academic Medical Center of Louisiana (LSU AMC)* (with Katy Coyle and Lindsay Hannah). Submitted by EarthTech to the Department of Veterans Affairs and the Federal Emergency Management Agency.
- 2009a *Preliminary National Register of Historic Places Evaluation for the Enrico Fermi Atomic Power Plant Monroe County, Lagoona Beach, Michigan* (Principal Investigator; by Dean A. Doerrfeld and Ben Riggle). Prepared for Commonwealth Cultural Resources Group, Inc.
- 2009b *Architectural Investigations for the Monocacy Boulevard Central Section City of Frederick, Maryland* (Principal Investigator; by Kirsten Peeler and Melissa Crosby). Prepared for Fox & Associates, Inc.
- 2009c *Integrated Cultural Resource Management Plan for the Bangor International Airport (ANG) and the South Portland Air National Guard Station, Maine Air National Guard* (with Kathryn G. Dixon, Jeffrey H. Maymon, Troy J. Nowak, Adam Friedman, Nathan S. Workman, and Lindsay Hannah). Prepared for Maine Air National Guard and National Guard Bureau.
- 2009d *Architectural Reconnaissance Survey Blue Creek Wind Farm Project Paulding and Van Wert Counties, Ohio* (Principal Investigator; by Benjamin M. Riggle, Jennifer L. Evans, and Melissa Crosby). Prepared for Heartland Wind, LLC.
- 2009e *Site-Specific Environmental Assessment for Building #2 The Veterans Affairs Medical Center (VAMC), New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller).
- 2010a *Integrated Cultural Resource Management Plan for Forbes Field Army National Guard Base, Kansas Air National Guard* (Principal Investigator; by Kathryn G. Dixon and Benjamin Riggle). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.

226

ATTACHMENT C

- 2010b *Integrated Cultural Resource Management Plan for the Jefferson Proving Ground/Jefferson Range, Indiana Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for Indiana Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010c *Integrated Cultural Resource Management Plan for Otis Air National Guard Base - Massachusetts Air National Guard* (Principal Investigator; by Kathryn Dixon and Nathan Workman). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010d *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Gateway Converter Station and the Maryland/Delaware State Line in Wicomico County, Maryland* (Principal Investigator; by Roger L. Ciuffo and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2010e *Site-Specific Environmental Assessment for Veterans Affairs Medical Center (VAMC)* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011a *Integrated Cultural Resource Management Plan for the 179th Airlift Wing/Mansfield Lahm Airport - Ohio Air National Guard* (Principal Investigator; by Kathryn Dixon, Jennifer Evans, and Melissa Crosby). Prepared for Ohio Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011b *Integrated Cultural Resource Management Plan for the Selfridge Air National Guard Base - Michigan Air National Guard* (Principal Investigator; by Katherine E. Grandine and Kathryn Dixon). Prepared for Michigan Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011c *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Seal Beach, Seal Beach, California and Detachment Fallbrook, Fallbrook, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011d *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Marine Corps Base, Quantico, Virginia* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011e *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Training Center Great Lakes, Illinois* (Principal Investigator; by Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011f *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Charleston, Charleston, South Carolina* (Principal Investigator; by Katherine Grandine, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011g *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Surface Warfare Center, Crane Division, Indiana* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.

ATTACHMENT C

- 227
2011h *Navy Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Marine Corps Air Station Miramar, San Diego, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011i *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Air Station North Island California and Naval Amphibious Base Coronado, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011j *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) Site Report: Naval Installations in the Hampton Roads Area, Virginia (Naval Station Norfolk, Naval Amphibious Base Little Creek, Naval Air Station Oceana and Dam Neck Annex)* (Principal Investigator; by Kathryn G. Dixon, Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011k *Gladhill Annexation: Maryland Inventory of Historic Properties Form, 8518 East Patrick Street, Frederick, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Frederick Land Company.
- 2011l *Integrated Cultural Resource Management Plan for the 114th Fighter Wing / South Dakota Air National Guard at Joe Foss Field* (Principal Investigator; by Kirsten G. Peeler, M.S., B.A. and Kathryn G. Dixon, B.A.). Prepared for the South Dakota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011m *Architectural Investigations at U.S. Army Garrison, Yuma Proving Ground, Yuma County, Arizona* (Principal Investigator; by Kirsten G. Peeler, Jennifer L. Evans, and Kevin F. May). Prepared for U.S. Army Garrison Yuma.
- 2011n *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Choptank River and the Gateway Converter Station in Dorchester and Wicomico Counties, Maryland* (Principal Investigator; by Roger L. Ciuffo, Benjamin Riggle, and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2011o *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Ellsworth Air Force Base, Rapid City, South Dakota* (Principal Investigator; by Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011p *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Wright Patterson Air Force Base, Dayton, Ohio* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011q *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Minot Air Force Base, Minot, North Dakota* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.

228

ATTACHMENT C

- 2011r *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Lackland Air Force Base, San Antonio, Texas* (Principal Investigator; by Rebecca Gatewood and Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011s *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Kirtland Air Force Base, Albuquerque, New Mexico* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011t *Ammunition and Explosives Storage for the Navy (1939-1989) and the Air Force (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Kathryn G. Dixon, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011u *Air Force and Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011v *Site-Specific Environmental Assessment for Disposition of Veterans Affairs Medical Center (VAMC), 1601 Perdido Street, New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011w *Phase I Submerged Cultural Resources Investigation for the Terrebonne Basin Shoreline Restoration Whiskey Island Project Item, Terrebonne Parish, Louisiana* (with Troy J. Nowak, Kathryn Ryberg, Katy Coyle and Susan Barrett Smith). Prepared for MWH Americas, Inc., Louisiana Office of Coastal Protection and Restoration, and the New Orleans District, U.S. Army Corps of Engineers.
- 2011x *Mary Hadley Tenant House, MIHP Form No. AL-VI-B-358* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland State Highway Administration.
- 2011y *Clifton-on-the-Monocacy: Nomination to the Frederick County Register of Historic Places* (Principal Investigator; by Kathryn Dixon). Prepared for Mr. and Mrs. Howard Crum.
- 2011z *Architectural Reconnaissance Survey for the Proposed Desert Wind Energy Project, Pasquotank and Perquimans Counties, North Carolina* (Principal Investigator; by Rebecca J. Gatewood and Martha Williams). Prepared for Iberdrola Renewables.
- 2012a *An Historic Context for NASA's Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler and Travis Shaw). Prepared for Parsons Infrastructure and Technology Group.
- 2012b *Architectural Reconnaissance Survey for the Tuscarawas Gas Processing Plant, Tuscarawas County, Ohio* (Principal Investigator; with Benjamin Riggle, Katherine Grandine, and Jennifer Evans). Prepared for El Paso Midstream, Inc.
- 2012c *Integrated Cultural Resource Management Plan for Kingsley Field Air National Guard Base - Oregon Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Oregon Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.

- ATTACHMENT C
- 229
2012d *Integrated Cultural Resource Management Plan for the 148th Fighter Wing / Minnesota Air National Guard at Duluth International Airport Guard* (Principal Investigator; by Kathryn Dixon, Kirsten Peeler, and Melissa Crosby). Prepared for the Minnesota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012e *Integrated Cultural Resource Management Plan for Shepherd Field Air National Guard Base - West Virginia Air National Guard* (Principal Investigator; by Kathryn Dixon and Roger Ciuffo). Prepared for the West Virginia Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012f *Integrated Cultural Resource Management Plan for the 166th Airlift Wing / Delaware Air National Guard at New Castle Airport* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Delaware Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012g *Campus-Wide Architectural Survey, Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler) Draft Technical Reports prepared for Parsons Infrastructure & Technology Group, Inc.
- 2012h *Architectural Investigations – NASA Goddard Space Flight Center (PG4-19)* (Principal Investigator; by Kirsten G. Peeler, Travis F. Shaw, Rebecca J. Gatewood, and Kathryn G. Dixon). Prepared for Parsons Infrastructure & Technology Group.
- 2012i *Rucker Park Historic Landscape and Structures Survey, Fort Sill Oklahoma* (Principal Investigator; by Rebecca J. Gatewood). Prepared for PaleoWest Archaeology.
- 2012j *Rucker Park Management Plan, Fort Sill, Oklahoma* (Principal Investigator; by Lindsay S. Hannah). Prepared for PaleoWest Archaeology.
- 2012k *Cultural Resource Survey Stage 1A Report, Newtown Creek, New York* (Principal Investigator; Stephen Schmidt, David McCullough, Kathryn Ryberg, Kathryn Kuranda). Prepared for Anchor QEA.
- 2012l *Woodstock College Maryland Inventory of Historic Properties and Determination of Eligibility Forms (BA-7), Baltimore County, Maryland* (Principal Investigator; by Katherine Grandine and Benjamin Riggle). Prepared for PBDewberry.
- 2012m *History of Air Force Civil Engineering 1907 – 2010*. Draft manuscript prepared for the Air Force Civil Engineering Support Agency (Principal Investigator with Katherine Grandine and Rebecca Gatewood). Prepared for USAMRAA.
- 2013a *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for CH2M HILL.
- 2013b *Curation Needs Assessment for Archeological Collections, Archival Documents, and Buildings 326 and 438, Fort Sill, Oklahoma* (Principal Investigator; with Nathanael Heller and Michael Proffitt, AIA). Prepared for All Consulting, Inc.

230

ATTACHMENT C

- 2013c *199 Baughmans Lane Maryland Inventory of Historic Properties Form, Frederick County, Maryland.* (Principal Investigator with Katherine Grandine) Prepared for the Conley Family Limited Partnership, Frederick, Maryland.
- 2013d *Lewis J. Martz House (F-3-259) and Angleberger Farm (F-3-260) Maryland Inventory of Historic Properties Forms, Frederick County, Maryland* (Principal Investigator; with Katherine Grandine and Jennifer Evans). Prepared for Christopher Crossing, Hogan Companies, Annapolis, Maryland.
- 2013e *Integrated Cultural Resources Management Plan for NASA Goddard Space Flight Center* (Principal Investigator; by Kirsten G. Peeler). Prepared for Parsons Infrastructure & Technology Group.
- 2013f *Proposed Manor at Holly Hills, 24 MIHP Form Addenda and 5 new MIHP Forms* (Principal Investigator; by Rebecca Gatewood, Jennifer Evans, Travis Shaw, Katherine Grandine, Kathryn Dixon, and Kirsten Peeler). Prepared for the Manor at Holly Hills and Landsdowne Development Group, LLC.
- 2013g *Frederick County Register of Historic Places Nomination Form and Supporting Documentation* (Principal Investigator; by Rebecca Gatewood and Katherine Grandine). Prepared for Church of Scientology.
- 2013h *Maryland Inventory of Historic Properties form for Cadillac Motel (PA:85A-81)* (Principal Investigator; by Kirsten Peeler). Prepared for Angela Patel.
- 2013i *Determination of Eligibility Form for Clinton Street Pier (B-5268)* (Principal Investigator; by Kirsten Peeler). Prepared for KCI Technologies, Inc. for Maryland Port Administration.
- 2013j *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for CH2M Hill Engineers, Inc.
- 2013k *Historic Preservation Analysis: Melford, Prince George's County, Maryland* (Principal Investigator; with Rebecca J. Gatewood). Prepared for St. John Properties, Inc.
- 2014a *Architectural Investigations HPO # 13-0145-Preferred Alignment between Mile Posts 1.9 and 9.0, Gloucester County, New Jersey* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission Co.
- 2014b *West Virginia Historic Property Inventory Form, Files Creek Compressor Station, Randolph County, West Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Natural Resource Group, LLC.
- 2014c *Fort Belvoir Railroad Bridge, HAER No. VA-141* (Principal Investigator; by Kirsten Peeler). Prepared for A. Morton Thomas & Associates, Inc.
- 2014d *Naval Proving Ground Indian Head, Charles County, Maryland – NPS Project #1750, Historic American Engineering Record (HAER) Report (HAER No. mD-179; MIHP No. CH-371)* (Principal Investigator; by Rebecca Gatewood, Roger Ciuffo, and Benjamin Riggle). Prepared for Eastern Research Group, Inc.

- 231 ATTACHMENT C
- 2014e *Indian Head Wayside Exhibit Panel* (Principal Investigator; by Rebecca Gatewood and Kristopher West). Prepared for Eastern Research Group, Inc.
- 2014f *Architectural Survey in Support of Columbia Gas Transmission Line 3664 Replacement Project, Wayne Township, Greene County, Pennsylvania* (Principal Investigator with Michael Hornum; by Rebecca Gatewood). Prepared for CESO, Inc.
- 2015a *Historic Assessment National Institute of Standards and Technology Gaithersburg, Maryland.* Prepared for Metropolitan Architects & Planners on behalf of the National Institute of Standards and Technology.
- 2015b *Determination of Eligibility Form for North Gay Street Survey Area B-5283* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Baltimore Development Corporation.
- 2015c *Preliminary Cultural Resources Investigations – Monrovia Town Center, Frederick County, Maryland* (Principal Investigator; by Kirsten Peeler and Kathleen Child). Prepared for Stanley Business.
- 2015d *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach Xpress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for Columbia Gas Transmission, LLC.
- 2015e *Addendum to Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach Xpress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission, LLC.

ATTACHMENT C
Testimony for Mayor and Council
Application to Build Townhouses on Site of Chestnut Lodge
Project Plan Application PJT2015-00005

25 April 2016

Good Evening, Mayor Newton and Members of the Council. My name is Noreen Bryan and I live at 207 S. Washington Street. Currently I am serving as the President of the West End Citizen's Association and this evening I am speaking as its representative.

I will address three topics:

- WECA's long involvement with Chestnut Lodge and our efforts to preserve it.
- Widespread community opposition to the townhouses.
- Why the application must be evaluated as part of the whole historic site, not as a separate, stand-alone parcel.

WECA's Dedication to Preservation of Chestnut Lodge- The main building was, and is, viewed by residents of the historic West End neighborhood as the jewel in the crown, the most significant defining feature on the West Montgomery Avenue gateway to Rockville. West End neighbors worked hand-in-hand with the original developer to preserve this site. In order to keep the main lodge and the front acres as open treed lawn, residents made many concessions, including more houses, bigger houses, and smaller lots. Neighbors believed that this was a good faith, binding agreement that would preserve the historic site forever. Morty Levine, the original developer, agreed to convert the lodge to 7 condominiums with underground parking and insisted on maintaining the front acreage as private property owned by the PRU. When the houses behind the lodge were sold, purchasers knew that they were buying into the preservation costs of the treed lawn and other historic elements on the site.

In May 2015 the applicant presented his proposal at WECA's General meeting. Neighbors expressed significant concerns. They said that the row of townhouses is out of character with the historic site- wrong footprint, wrong height, not in any way reminiscent of the lodge destroyed by fire, and fails to preserve the history of the site, thereby, failing to fulfill the PRU agreement.

In specific,

- The proposed townhouses are not in character-size, orientation, architectural design- with the historic site, other historic buildings on the site or the main building that was destroyed by fire.
- Having the townhouses face Thomas Street is contradictory to the layout of the historic site. The lodge faced West Montgomery Avenue not Thomas Street.
- The lodge had finished facades on three sides- east, north and west. The west façade of the townhouses is proposed to be the backs of the townhouses

with decks, garages, and parking, which are out of character with the historic site and former lodge.

- Why hasn't the applicant given serious consideration to reconstruction of the former lodge?

Accordingly, I formed a WECA committee to address the merits of the application, asking Patricia Woodward, former head nurse at Chestnut Lodge and WECA President when the PRU agreement was approved, to be its chair. She assembled a committee composed of members with long knowledge and involvement with Chestnut Lodge. Many of them will testify tonight.

After deliberations the WECA Executive Board adopted the following resolution on September 3, 2015: *"WECA requests that the Mayor and Council 1) Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate to the site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site. (2) Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district."*

Community Opposition to Townhouses on Historic Chestnut Lodge Site

There is widespread community opposition to the townhouses. A petition has been circulated and 180 people have signed it. A paper copy of the petition and the list of signatures are provided for the record. Here are a couple comments from signers:

- Dr. Wesley Dingman: "As a long time resident in suburban Maryland (1960-2002) [Bethesda, Kensington, Rockville, Potomac, Adamstown] and a longtime physician employed at Chestnut Lodge Hospital (1977-2001), I am urging the City of Rockville not to allow town-houses to be built on the grounds of the former Chestnut Lodge Hospital."
- Elizabeth A. Reed: "In my opinion, the proposed town houses for the Chestnut Lodge site would constitute a travesty! It would in no way support the original intent of protecting the integrity of the Lodge's history and significance of this site as a more than 100-year old aspect of Rockville's history! I am a 4th generation resident of Rockville, and my Great Grandparents came to Rockville before 1890 for a summer-escape from the heat and congestion of D.C. staying at the Woodlawn Hotel which was the original use of the Chestnut Lodge building. It would be an enormous misuse to now put townhouses with presentation of the rear of the structure viewable from West Montgomery Avenue, along with the back porches, garbage cans, etc. Ass of which in no way references the Lodge's character or history. Please do not let this happen!!!"

The Application must be assessed in context of the whole historic site, not as a separate parcel

To date staff analysis has been treated the application as if it were a separate parcel divorced from the rest of the historic site. This is wrongful thinking. All of the historic buildings- the Main Lodge, Fromm-Reichmann cottage, the ice house, the stable and others are part of the historic district. The Planned Residential Unit created for the site encompasses the historic district and the houses behind it. When a property in the PRU is sold, the purchaser buys the covenants of the PRU as well as the land and buildings and must treat their property in accordance with the covenants. A simple example, if covenants include maintenance of the roads, then a new purchaser cannot opt out.

This application to build townhouses on the site of the main lodge cannot be treated independent of the whole. To that end, on May 24, 2004 the Rockville Mayor and Council adopted "Chestnut Lodge Design Guidelines." This document pertains exclusively to the Chestnut Lodge property. Some of the goals therein are:

- To preserve and protect the existing character of the historic districts, including the natural and built environments.
- To identify significant historical buildings and features on the property.
- To protect the architectural heritage, established character, and value of the West Montgomery Historic District.

Clearly the Guidelines intended that any individual building be considered in terms of the whole, not as a stand-alone entity. Further, the Design Guidelines establish a hierarchy and significance for the buildings. Specifically, the Guidelines say: *"The Chestnut Lodge site in the West Montgomery Avenue Historic District has two primary contributing structures-[the main building and the Fromm-Reichmann cottage] and four secondary or accessory structures. Primary structures define the character and the use of the site. Secondary or accessory structures contribute to the architectural and historic character and use of the site, but do not define it. For example, a fictional farmstead complex has two primary contributing structures, a farmhouse and a barn. Without these two structures it would not be a farmstead."* Without Chestnut Lodge main building and the Fromm-Reichmann cottage this site would not be an historic summer hotel and hospital. **A replacement structure must measure up to the original Main Lodge in character, size and footprint, and architectural design.**

For these reasons and those that will be provided by other members of the WECA committee, WECA believes that the application for townhouses does not meet the Chestnut Lodge Design Guidelines, conflicts with the Master Plan and should be denied.

No to Townhouses at Chestnut Lodge

Petition published by Chestnut Lodge Committee of WECA on Aug 30, 2015

Target: City of Rockville Mayor and Council

Region: United States of America

Petition Background (Preamble):

A developer has proposed 7 townhouses at 500 W. Montgomery Ave., the Chestnut Lodge site, which requires a change to the approval of the Planned Residential Unit (PRU) for that overall development. The former Main Building at Chestnut Lodge Hospital, originally known as the Woodlawn Hotel, was perhaps the most significant historic building in Rockville.

The approved PRU development on the site of the former hospital was designed specifically to honor the history of both the building and the hospital. The Main building was to have been the centerpiece of the 7 acre historic district, giving the surrounding historic buildings context, both within the Chestnut Lodge site itself and in the greater W. Montgomery Historic District.

To facilitate this goal, which required maintaining the green space and gracious tree lawn along the West Montgomery frontage, a compromise was reached between the prior developer and The City which allowed the new houses to the rear in the non-historically designated portion of the PRU to be built more densely than would be allowed in the R-90 zone.

The Main building was to have been renovated with underground parking to preserve the iconic appearance and vistas from West Montgomery Ave. as well as from the other restored historic buildings behind it. Tragically, the Main building was destroyed by a fire in 2009, having stood empty for eight years.

While the original Main Building is now gone, that does not mean any structure, so long as it contains up to the 7 residential units approved for the site, should be allowed. We strongly believe it is imperative that any new building must: 1. Maintain the integrity of the approved PRU which honors the site's history, 2. Protect Rockville's cultural landscape, and 3. Preserve the historic view shed from all four sides.

This proposal places the side of the townhouse structure facing W. Montgomery, historically the front of the site. The backs of garages, surface parking, trash cans and the like would be placed along the west side of the site, clearly visible to all approaching from the west as well as from the residences to the west, south and north, including some in the historic district.

There are no other townhouses in the West Montgomery Historic District, along W. Montgomery Ave., nor were any allowed in the back of the new Chestnut Lodge development.

Townhouses in this area clearly do not preserve Rockville's cultural landscape, the historic view shed, nor would they do anything to speak to the history of this site.

Petition:

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the

solution that will adequately preserve and honor this historic site.

2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Record of Petition: **No To Townhouses at Chestnut Lodge**

The petition was circulated by hand and on-line.

- 65 people signed the petition on-line
- 115 people signed the paper petition

The original hand signatures are attached with a copy of the on-line signers.

PETITION

239

NOT TOWNHOUSES AT CHESTNUT LODGE
ATTACHMENT C

A developer has proposed 7 townhouses at 500 W. Montgomery Ave., the Chestnut Lodge site, which requires a change to the approval of the Planned Residential Unit (PRU) for that overall development. The former Main Building at Chestnut Lodge Hospital, originally known as the Woodlawn Hotel, was perhaps the most significant historic building in Rockville. The approved PRU development on the site of the former hospital was designed specifically to honor the history of both the building and the hospital. The Main building was to have been the centerpiece of the 7 acre historic district, giving the surrounding historic buildings context, both within the Chestnut Lodge site itself and in the greater W. Montgomery Historic District. To facilitate this goal, which required maintaining the green space and gracious tree lawn along the West Montgomery frontage, a compromise was reached between the prior developer and The City which allowed the new houses to the rear in the non-historically designated portion of the PRU to be built more densely than would be allowed in the R-90 zone. The Main building was to have been renovated with underground parking to preserve the iconic appearance and vistas from West Montgomery Ave. as well as from the other restored historic buildings behind it. Tragically, the Main building was destroyed by a fire in 2009, having stood empty for eight years.

While the original Main Building is now gone, that does not mean any structure, so long as it contains up to the 7 residential units approved for the site, should be allowed. We strongly believe it is imperative that any new building must: 1. Maintain the integrity of the approved PRU which honors the site's history, 2. Protect Rockville's cultural landscape, and 3. Preserve the historic view shed from all four sides.

This proposal places the side of the townhouse structure facing W. Montgomery, historically the front of the site. The backs of garages, surface parking, trash cans and the like would be placed along the west side of the site, clearly visible to all approaching from the west as well as from the residences to the west, south and north, including some in the historic district. There are no other townhouses in the West Montgomery Historic District, along W. Montgomery Ave., nor were any allowed in the back of the new Chestnut Lodge development. Townhouses in this area clearly do not preserve Rockville's cultural landscape, the historic view shed, nor would they do anything to speak to the history of this site.

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

No to Townhouses at Chestnut Lodge

Petition published by Chestnut Lodge Committee of WECA (author.php?petid=74604) on Aug 30, 2015

Background (Preamble):

A developer has proposed 7 townhouses at 500 W. Montgomery Ave., the Chestnut Lodge site, which requires a change to the approval of the Planned Residential Unit (PRU) for that overall development. The former Main Building at Chestnut Lodge Hospital, originally known as the Woodlawn Hotel, was perhaps the most significant historic building in Rockville.

The approved PRU development on the site of the former hospital was designed specifically to honor the history of both the building and the hospital. The Main building was to have been the centerpiece of the 7 acre historic district, giving the surrounding historic buildings context, both within the Chestnut Lodge site itself and in the greater W. Montgomery Historic District.

To facilitate this goal, which required maintaining the green space and gracious tree lawn along the West Montgomery frontage, a compromise was reached between the prior developer and The City which allowed the new houses to the rear in the non-historically designated portion of the PRU to be built more densely than would be allowed in the R-90 zone.

The Main building was to have been renovated with underground parking to preserve the iconic appearance and vistas from West Montgomery Ave. as well as from the other restored historic buildings behind it. Tragically, the Main building was destroyed by a fire in 2009, having stood empty for eight years.

While the original Main Building is now gone, that does not mean any structure, so long as it contains up to the 7 residential units approved for the site, should be allowed. We strongly believe it is imperative that any new building must: 1. Maintain the integrity of the approved PRU which honors the site's history, 2. Protect Rockville's cultural landscape, and 3. Preserve the historic view shed from all four sides.

This proposal places the side of the townhouse structure facing W. Montgomery, historically the front of the site. The backs of garages, surface parking, trash cans and the like would be placed along the west side of the site, clearly visible to all approaching from the west as well as from the residences to the west, south and north, including some in the historic district.

There are no other townhouses in the West Montgomery Historic District, along W. Montgomery Ave., nor were any allowed in the back of the new Chestnut Lodge development.

Townhouses in this area clearly do not preserve Rockville's cultural landscape, the historic view shed, nor would they do anything to speak to the history of this site.

Petition Text:

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Comment: Townhouses should not be built in replacement!

45N/G Diane	Kilcoyne	dpkilcoyne@yahoo.com	N/G	N/G	N/G	USA	N/G	Oct 19, 2015
44N/G Patrick	Schoof	patrick@patricksschoof.com	N/G	N/G	N/G	USA	N/G	Oct 15, 2015

Comment: Yes, Patricia, I agree

ATTACHMENT C

43N/G Elizabeth A. Reed	eareed1@gmail.com	100 Thomas Street	Rockville	Maryland	Canada	20850		Oct 14, 2015
-------------------------	-------------------	-------------------	-----------	----------	--------	-------	--	--------------

Comment: In my opinion, the proposed town houses for the Chestnut Lodge site would constitute a travesty! It would in no way support the original intent of protecting the integrity of the Lodge's history and significance of this site as a more than 100-year old aspect of Rockville's history! I am a 4th generation resident of Rockville, and my Great Grandparents came to Rockville before 1890 for a summer-escape from the heat and congestion of D.C., staying at the Woodlawn Hotel which was the original use of the Chestnut Lodge building. It would be an enormous misuse to now put townhouses with presentation of the rear of the structure viewable from West Montgomery Avenue, along with their back porches, garbage cans, etc. All of which in no way references the Lodge's character or history. Please do not let this happen!!!

42N/G Lauri	Shapiro	lshapiro526@gmail.com	533 Brent Road	Rockville	MD	USA	20850	Oct 06, 2015
-------------	---------	-----------------------	----------------	-----------	----	-----	-------	--------------

Comment: I'm not opposed to the redevelopment of the property, but I do not think townhouses are the right fit for the Historic District of Rockville. I hope the City, Neighbors and Developer can work together to agree on an aesthetically pleasing and mutually beneficial use for the property.

41N/G Matthew	Shapiro	matt@e-shapiro.com	533 Brent Rd	Rockville	MD	USA	20850	Oct 06, 2015
---------------	---------	--------------------	--------------	-----------	----	-----	-------	--------------

40N/G Jessica	Smith	smith.jmott@gmail.com	N/G	N/G	N/G	N/G	N/G	Oct 04, 2015
39N/G Benjamin	Smith	benpsmith@gmail.com	N/G	N/G	N/G	N/G	N/G	Oct 04, 2015
38N/G Phyllis Hull	Alturk	akturkph@gmail.com	N/G	N/G	N/G	N/G	N/G	Oct 02, 2015

Comment: Worked part time in reception from 1966-1971. So sad to see original building gone! Would like to see a park there!

37N/G Oren	Fromberg	orenfromberg@gmail.com	N/G	N/G	N/G	N/G	N/G	Sep 27, 2015
36N/G Laurie	Fromberg	lauriefromberg@gmail.com	N/G	N/G	N/G	N/G	N/G	Sep 27, 2015
35N/G Keith	Jacobson	keith.jacobson305@gmail.com	119 Forest	N/G	N/G	N/G	N/G	Sep 25, 2015
34N/G Katherine	Michaelian	kmichaelian91@gmail.com	119 Forest	N/G	N/G	N/G	N/G	Sep 25, 2015
33N/G Robert	Gale	rob.crgale@verizon.net	108 w. Argyle st	Rockville	Md	USA	20850	Sep 24, 2015

Comment: I support development of the property, but should be an extension of the current homes on Bullard Circle. Back yards should NOT be visible from Montgomery Ave. Treat same as Henson Oaks Lane with end homes facing Montgomery Ave

32N/G JONATHAN WALSH	jonwalsh@yahoo.com	AUTUMN WIND WAY	ROCKVILLE	MD		N/G	20850	Sep 21, 2015
----------------------	--------------------	-----------------	-----------	----	--	-----	-------	--------------

31N/G Douglas	Lunenfeld	dlunenfeld@gmail.com	N/G	N/G	N/G	N/G	N/G	Sep 21, 2015
---------------	-----------	----------------------	-----	-----	-----	-----	-----	--------------

Comment: The fire was questionable as to how and who started it and Rockville lost a landmark. 7 townhouses does nothing in keeping with the landmark. They should rebuild the old building if anything and go with the original plans or do nothing at all

30N/G Rusty	Morgan	rustymorgan@mris.com	103 N Van Buren Street	Rockville	md	USA	20850	Sep 21, 2015
29N/G Luc	Hale	lucjameshale@gmail.com	310 mannakee st	Rockville	MD	USA	20850	Sep 20, 2015

Comment: No thank you

28N/G Pat	Dowler	patsdowler@aol.com	620 Anderson Ave	Rockville	N/G	N/G	20850	Sep 20, 2015
-----------	--------	--------------------	------------------	-----------	-----	-----	-------	--------------

27N/G Bruce	Plunkett	btep@comcast.net	419 west Montgomery ave	Rockville	N/G	USA	N/G	Sep 20, 2015
-------------	----------	------------------	-------------------------	-----------	-----	-----	-----	--------------

26N/G Jeanne	Omeara	jeanne.omeara@timelife.com	419 west Montgomery ave	Rockville	N/G	USA	N/G	Sep 20, 2015
--------------	--------	----------------------------	-------------------------	-----------	-----	-----	-----	--------------

25N/G Casey	McCants	caseymccants@yahoo.com	N/G	N/G	N/G	N/G	N/G	Sep 19, 2015
-------------	---------	------------------------	-----	-----	-----	-----	-----	--------------

24N/G Nadia	Azumi	nadia@nadiasilk.com	6, Nocturne Court	Rockville	MD - Maryland	N/G	20850	Sep 19, 2015
-------------	-------	---------------------	-------------------	-----------	---------------	-----	-------	--------------

Comment: I strongly oppose the re development of the Chestnut Lodge. In fact it would be better to have the old Hotel rebuilt there.

23N/G Don	Kettlestrings	daket@verizon.net	N/G	N/G	N/G	N/G	N/G	Sep 19, 2015
-----------	---------------	-------------------	-----	-----	-----	-----	-----	--------------

22N/G Bill	Burchett	bbb243@msn.com	119 South Adams St	N/G	N/G	N/G	N/G	Sep 19, 2015
------------	----------	----------------	--------------------	-----	-----	-----	-----	--------------

Comment: No to sideways facing townhouses. Yes to reconstructing the original building as condos.

21N/G Kaye	Kubas	kayekubas@gmail.com	503 Carr Avenue	Rockville	Maryland	N/G	20850	Sep 19, 2015
------------	-------	---------------------	-----------------	-----------	----------	-----	-------	--------------

20N/G Mary Garrett	Abert	babyabert@aol.com	9 Maryland Ave.	Rockville	Maryland	N/G	20850	Sep 19, 2015
--------------------	-------	-------------------	-----------------	-----------	----------	-----	-------	--------------

24119 S Van

HAND SIGNED
PETITION
TOTAL: 115

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE
This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge> 242

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration. Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Mary Tyler Vitob	11 Wall St		Rockville	MD	20850
	Ida L. Wassenmeyer	401 Anderson Av		Rockville	MD	20850
	Richard Powers	131 S. Adams St.		Rockville	MD	20850
	Rose Mullen	211 Russell Ave.		Gaithersburg	MD	20877
	Susan Mabry	21 Duke St.		Rockville	MD	20850
	William C. Hyatt	5 Clevesand Ct.		Rockville	MD	20850
	Babette Wells	44 E. F. Cleveland Ct		Rockville	MD	20850
	George E. Mabry	21 Date Street		South Rockville	MD	20850
	Charles Woodward	10 Maryland Ave		Rockville	MD	20850
	Philip F. Williams	116 Stallenford Rd		Dartmouth	VA	22721

ATTACHMENT C

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Patricia Woodward	111 North Van Buren St.	Rockville, Md.	20850		
	Carlotta Woodward	13224 Lewisdale Road	Chilburg	MD	20871	
	Valli Nicole Hauspurg	11720 LeClare Drive	Rockville	MD	20854	
	Mary Annala	11301 Harvest Hill Ln.	Germanstown	MD	20894	
	Presenta Ruiz	24405 Olms View Drive	DAMASCUS, MD	20872		
	Brian Rubinstem	4835 Conwell Ave	Bethesda, MD	20814		
	Rodney Hermann	5003 Walnut Dr	Rockville	MD	20855	
	Ashley Endersbyth	11526 Patuxent Dr.	Rockville	MD	20852	
	Robin Braun	26808 Howard Chapel Dr	DAMASCUS, MD	20872		
	Karen Mooney	21611 Ripplemead Dr.	Laytonsville	MD	20882	

ATTACHMENT

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration. Signed:

Signature	Print Name	Address:	Street	City/Town	State/County	ZIP
	Maizie Cummings-Rocke	307 Woodland Rd	Rockville MD			20850
	EAWARA BOWLING	1 ENGLISHTOWN CT.	ROCKVILLE MD			20854
	GAIL HIXENBAUGH	634 GOLDSBOROUGH DRIVE	ROCKVILLE MD			20850
	Jennifer Schwartz	Tennife Schwantz	4936 Small Gumb	Fredrick MD		20850
	Laurie Sweeney	5705 Serenity Ln	Rockville MD			20850
	Janet Sedlick	2205 Glenmore Ter	Rockville MD			20850
	Jean Provost	1705 Electonberry Rd	Rockville MD			20854
	JANET T. PROVOST	1705 Glenstoneberry Rd.	Rockville, MD.			20854
	Carolyn Manning	18611 Chickadee Lane	Gaithersburg MD			20879
	Paul G. Woodward	4 Beltsam Dr.	Cumberland Ctry, MD			21022

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
<i>[Handwritten Signature]</i>	NADIA AZOH	6 HICKORYNE ST	ROCKVILLE	MD		20850
<i>[Handwritten Signature]</i>	William B. Morgan	11800 Eastern Street	Rockville	MD		20850
<i>[Handwritten Signature]</i>	Monty's Cupman	298 Lynch St	Rockville	MD		20850
<i>[Handwritten Signature]</i>	Susan Myers	509 W Montgomery Ave	Rockville	MD		20850
<i>[Handwritten Signature]</i>	Myron Myers	509 W Montgomery Ave	"	"	"	"
<i>[Handwritten Signature]</i>	JAMES T MARRIMAN	5 OLD CREEK ST	ROCKVILLE	MD		20854
<i>[Handwritten Signature]</i>	Irene S. Pickering	105 Caldwell Rd.	Rockville	Md.		Irene S. Pickering
<i>[Handwritten Signature]</i>	Ronald A. Pickering	105 Caldwell Rd.	Rockville	Md.		Ronald A. Pickering
<i>[Handwritten Signature]</i>	Beth Porfiri	4017 Briars Rd	Oiney	MD		20832

ATTACHMENT C

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address:	Street	City/Town	State/County	ZIP
<i>Helen C. Murdock</i>	Helen C. Murdock	605 Astor Blvd		Rockville	Md	Montgomery 20850
<i>Genevieve J. Ricketts</i>	Genevieve Ricketts	408 Woodburn Rd		Rockville	MD	20850
<i>Diane F. Albertini</i>	Diane F. Albertini	1326 Canterbury Way		Rockville	MD	20854
<i>Nell Hubbard</i>	Nell Hubbard	14601 Malinda Lane		Rockville	MD	Montgomery 20851
<i>M. Joyce Flick</i>	Joyce Flick	3 Stevens Ct		Rockville	MD	Montgomery 20850
<i>Margie M. Morris</i>	MARIE MORRIS	17	AD CREEK	ROCKVILLE	MD	20857
<i>Elizabeth Young</i>	Elizabeth Young	2004 Freeland Rd.		Rockville	MD	20853
<i>Frances D. Conger</i>	Frances D. Conger	1501 Ritchie Pkwy		Rockville	MD	20852
<i>Elizabeth Manning</i>	ELIZABETH MANNING	106 N. Van Buren		Rockville	MD	20850
<i>Robert Manning</i>	ROBERT MANNING	"		"	"	"

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration. Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Sherman Lien	313 North Van Buren St.		Rockville	MD	20860
	Cassie Du	14105 Chelmsford Rd		Rockville	MD	20853
	Rose Sahr	103 North St		Rockville	MD	20850
	Jesse Sahr	103 North St		Rockville	MD	20850
	STEWART BROWN	207 W. MONTGOMERY AVE		ROCK	MD	20850
	Manuel Olive	118 North St		Rockville	MD	20861
	Herinda Olive	118 7th St.		Rockville	MD	20850
	Shyam Shrestha	120 North St		Rockville	MD	20850
	Shannon Sikes	McCart Doan St		Rockville	MD	20850
	Melanie Zalesky	101 North Street		Rockville	MD	20850

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
<i>Sharon Omdorff</i>	Sharon Omdorff	1107 Gilbert Rd		Rockville	MD/Montgomery	20857
<i>Nancy Robertson</i>	Nancy Robertson	12024 Whipple		Rockville	Md/Montgomery	20852
<i>Kenneth Dohls</i>	Kenneth Dohls	4505 Holney Ln		Olney	MD Montg	20832
<i>Angela Alley</i>	Angela Alley	10700 Game		Platinum Rd.		20879
<i>Julia Dohls</i>	Julia Dohls	3 Raddy		Dodge Rd	G.B	20878
<i>Baker Wells-Hopit</i>	Baker Wells-Hopit	5 Cleveland		et	Rockville	20850
<i>W.C. Hyatt</i>	W.C. Hyatt	5 Cleverland		et	Rockville	20850
<i>Walter K. ...</i>	Walter K. ...	Judith Miamon		177 Gas	Rockville	20854
<i>Eugenie N. Ashby</i>	Eugenie N. Ashby	Gregory		4123 Larsson	La.	MT Airy, MD 21721
<i>Rodger K. Gregory</i>	Rodger K. Gregory	"		"	"	"

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Ruth Shaver	304 Great Falls Rd.	Rockville	Md.	Mont.	20850
	Monique DeFrees	503 Beall A	Rockville	MD		20850
	David Mann	503 Beall Ave.	Rockville	MD		20850
	Kathy Moch	201 Nelson Street.	Rockville	MA		20850
	MARGARET HOPMAN	15012 BRAUER DRIVE	ROCKVILLE	MD		20853

ATTACHMENT

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE
This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

250

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
<i>Elizabeth A. Reed</i>	Elizabeth A Reed	100	Thomas St.	Rockville	MD	20850
<i>Phyllis R. Morrow</i>	Phyllis R. Morrow			27 W. Montg.	Rockville, MD	20850
<i>Jane M. Pontius</i>	Jane M. Pontius	122 S. Van Buren St.		Rockville, MD		20850
<i>James M. Pontius</i>	James M. Pontius	128 S. Van Buren St.		Rockville, MD		20850
<i>Robert J. Foreman</i>	Robert J. Foreman	23404	Stoughton Rd.	Cockeysburg, Md.		20870

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

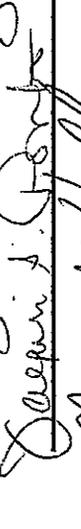
WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Charles O. Mayor	301 W Montgomery		Rockville	MD	20850
	Margaret May	" "	" "	" "	" "	" "
	Jacquie Fort	307 West Montgomery		Rockville	MD	20850
	MARGARET HASCY	215 Hawley St		Rockville	MD	20850
	KENNAN A. SOMERS	710 SWANWOOD PARK		ROCKVILLE	MD	20850
	KEVIN ZALETSKY	101 NORTH ST		ROCKVILLE	MD	20850
	ROBERT MCGUIRE	1215 SUNBURN ST		ROCKVILLE	MD	20850

ATTACHMENT C

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE
This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

252

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Mary McEachern	208 Forest Ave		Rockv.	USA	20850
	Julian Sparrow	1912 Mill Run Dr.		Deerwood,	MD	20855
	Jennifer Ricketts	11		"	"	"
	James Vitol	11 Wall St.		Rockville	MD	20850
	Tyler Pete	102 N Adams St		Rockville	MD	20850
	Patrick Dagher	111 N. Van Buren St.		Rockville	MD	20850

ATTACHMENT

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address:	Street	City/Town	State/County	ZIP
<i>Régine He S. Schaffer</i>	Régine He S. Schaffer	5 Mojave Ct.		Rockville	MD	20850
<i>Margaret L. Gelin</i>	Margaret L. Gelin	105 S. Van Buren	" "	" "	" "	20850
<i>Frederick W. Newson</i>	FREDERICK W. NEWSON	10 Dale		Rockville	MD	20850
<i>Anna D. Mighell</i>	Anna D. Mighell	510 Lynch St		Rockville	MD	20857
<i>Kaye L. Hubas</i>	Kaye L. Hubas	503 Carr Ave		Rockville	MD	20850
<i>Evelyn F. Bosley</i>	Evelyn F. Bosley	505 Lynch St		Rockville	MD	20850
<i>Leah D. Randolph</i>	Leah D. Randolph	20501 Staffordshire Dr.		Germanatown	MD	20874

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge> 254

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
	Alex O'Neil	128 Calvert Rd		Rockville	MD	20850
	DAVID LIPMAN	18186 Maple		Rockville	MD	20850
	Sheree Lane	13105 Atlantic Ave		Rockville	MD	20850
	Shauna Cardin			Rockville	MD	20850
	JOAN HUNTER	7ETHAN ST		Rockville	MD	20850
	David Weinstein	707 Brentwood		Rockville	MD	20850
	Deirdre Unger			Rockville	MD	20850
	Anne Keirns			Brent, Rockville		20850
	Janice Compton			Rockville, MD		20850
	Gough Egan			Rockville, MD		20850

ATTACHMENT C

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address:	Street	City/Town	State/County	ZIP
	Kimberly R. James Ostell	2250 Owens St	Rockville	MD	21086	21086
	James Ostell	128 Calver Rd	Rockville	MD	20850	20850
	Kelly D. Hale	706 Roxboro Ave	Rockville	MD	20850	20850

ATTACHMENT C

To: 256 Mayor & Council, Rockville MD

ATTACHMENT C
24 April 2016

Subject: Proposed Amendment to PJT2015-00005 for the amendment of the Chestnut Lodge
Planned Residential Unit (PRU2005-00022)

I request that you do not approve the proposed amendment by JNP Chestnut Lodge LLC for construction of seven townhouses on the site of the former Chestnut Lodge Hospital at 500 West Montgomery Avenue.

Original PRU allowed for significant exemption to zoning restrictions in permitting seven condominium units in the then existing main Chestnut Lodge Building. The exemptions were largely granted in exchange for preserving the original structure that occupied this site for more than 100 years.

My reasons for this request include:

- * Original PRU allowed for significant exemptions to zoning restrictions in permitting seven condominium units in the then existing main Chestnut Lodge building.

- * Proposal fails to resemble the original building in many ways:

 - orientation to West Montgomery Ave. is wrong
 - height is substantially lower (more than 1 storey lower),
 - mansard roof is not recreated,
 - prominent tower is missing

- * Newly constructed townhouses have not been permitted within the Historic District.

The current owner of this property should not be permitted to build without following the original conditions of PRU2005-00022.

I would argue further that this property has as much significance to the history of Rockville as the Glenview Mansion on the Lyon's Estate. Chestnut Lodge Sanatorium in its 90 years of existence was a major, highly regarded mental health institution in the United States that influenced the evolution of psychiatric practice and treatment in this country and worldwide.

Another way to honor the Chestnut Lodge is to plant new chestnut trees. This effort should be a joint one involving the developer, citizens and Rockville Recreation & Parks Department.

This proposal is an affront to the historic district and does no honor to Rockville's history.

Respectfully submitted,

Marian L. Hull
Marian Hull
529 Brent Road
Rockville MD 20850

Reconstruction (as I see it)

Exhibit No. 20
Chestnut Lodge
PJT2015-00005

ATTACHMENT C

- A new term being used in Rockville, interpreted in many ways, but in essence:
 - depicting, by means of new construction, the form, features, and detailing of a non-surviving site, for the purpose of *replicating its appearance at a specific period of time and in its historic location.*
- What I've seen in recent months is that Reconstruction is real and has and is being used to preserve history of places, past peoples, as well as significant historical events
 - It provides a context for understanding the past

- There is no one-size-fits-all description of Reconstruction
 - In the last few months I've visited (5) different reconstructed building at 3 different locations, some used for different purposes and *everyone of them rebuilt differently*

Reconstruction (2)

- I'll try to go through the 5 examples at three sites, so excuse me if I am talking quickly and not getting into too many specifics – I've only got 3 minutes

In the past 5 months, I've visited 3 sites

- Appomattox, VA (National Historical Park)
- Staunton, VA, in the Shenandoah Valley, where almost everything in the city is historic
- Edgewater, VA, Southern Anne Arundel County
 - Site of some of the earliest settlements in Maryland

Reconstruction - Appomattox

- Famous for its '15 minutes of fame'
 - And I mean the surrender by General Lee to General Grant of the Army of NOVA in April 1865 (151 years ago this month)
 - Appomattox wasn't famous before it, and was largely forgotten for 30 years and the site abandoned when the railroad came close, but not close enough to keep the site relevant

ATTACHMENT C

Reconstruction (4)

- Surrender took place in the McLean house, a private residence
 - It was Sunday, so the logical place, the courthouse was closed and no one around had the key
 - Surrender took place in the McLeans' Living Room, while they stayed upstairs in their bedroom
 - In less than 3 hours, the surrender was over

Reconstruction (5)

- After abandoned, houses fell into repair and 1892 the brick Courthouse burned out (much like CL)
- In 1893, a private venture disassembled the McLean house and move it to DC for a proposed Civil War Museum.
- But economy went bad, and the McLean house parts were left in a pile on the site – exposed and unprotected

ATTACHMENT C

Reconstruction (6)

- The site was left as-is until 1940, when plan began for a National Historical Park
 - WWII interrupted that.
- Work restarted in 1947, and the McLean house was rebuilt in 1947-1949, opened in 1950
 - Difficult restoration – rotted wood, souvenir hunters, and rudimentary documentation left from the 1893 disassembly
 - Handwritten notes describing the rooms (dimensions and some details on interior trim)
 - A few photos and crude drawings
 - And an archaeological dig – only original piece was the basement fireplace hearth – buried intact

Reconstruction (7)

- From the 1950-1960s, other buildings were either renovated, rehabilitated, but two other buildings were Reconstructed
 - Appomattox Court House (rebuilt 50+ years after the fire) – luckily they had records of its construction
 - But building was repurposed – it is now the Visitor's Center, museum, small theatre, and offices for NPS personnel
 - McLean Kitchen (separate from the house)
 - Rebuilt, but only reference is a photo showing the upper half of the building
 - The rest was research on similar buildings and a lot of conjecture

Reconstruction (8) - Staunton

- Visited Staunton to see Western State Hospital, a former mental health hospital, now being converted into renovated single family homes, and Hospital buildings into condos and apartments

But I got distracted when I found a Reconstruction instead:

- The American Shakespeare Center's *Blackfriars Theatre*
- *The only Reconstruction in the world of London's Blackfriars Theatre, an upscale, fully lit⁸ theatre of which Shakespeare was part owner.*

Reconstruction (9)

- The Focus of the Reconstruction of the Blackfriars is the interior and the desire to present Shakespeare's work as it was originally presented to audiences in the 17th century

The original London theatre was demolished during the English Civil War in 1666

There are no surviving architectural descriptions of the theatre, inside or out, except some rough dimensions

- The architect had to visit London to view similar theatres of that time and even use Shakespeare's instructions to determine the size, shape and orientation of the stage

Reconstruction (10)

ATTACHMENT C

- Blackfriars is intimate, but fully lit even for the audience and seating are wooden chairs and benches
- Actors were encouraged to get the audience to interact during the play
 - The stage is small and the audience is close
- So if you want to see Shakespeare the way he intended the audience to experience it, you need go to Blackfriars in Staunton, VA

Reconstruction (11) All Hallows'

- All Hallows' Parish and Church were constructed in Colonial America by the Church of England (Anglican)
 - Parish in 1669, Church in 1729
- All brick structure, small and simple with a modest congregation (including Sellmans until 1919)
- Church in continuous operation, with some renovations, until 1940, until the church burned down (like CL)

Reconstruction (12)

ATTACHMENT C

- The Congregation decided to Reconstruct the church
 - Remaining brick walls were repaired and replaced, and entire building reconstructed back to its 1729 design inside and out
 - Drawings, sketches referenced
 - Only 'modern' convenience is electrical lighting
 - No A/C and the only heat is an old fireplace at the far back of the church
 - Church is a working church: services every Sunday at 10:30am¹²

Reconstruction (13)

- So I've described (5) reconstructed buildings, most of which were done for different reasons and rationale
- But they all preserve history (structures, people, events of the past) and provide the current users a taste of that past
- Are there any questions?

ATTACHMENT C

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Tuesday, April 26, 2016 9:45 AM
To: Allen Schiffenbauer; mayorcouncil
Subject: RE: Comments on Chestnut Lodge

Mr. Schiffenbauer,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Allen Schiffenbauer [mailto:aschiffenbauer@gmail.com]
Sent: Monday, April 25, 2016 10:16 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Comments on Chestnut Lodge

Attached please find a copy of the remarks I made at the Mayor and Council session on 4/25

Allen Schiffenbauer

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Tuesday, April 26, 2016 9:45 AM
To: Paul Newman; mayorcouncil
Subject: RE: Testimony re: Chestnut Lodge

Mr. Newman,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Paul Newman [mailto:Newman1259@live.com]
Sent: Monday, April 25, 2016 6:44 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Testimony re: Chestnut Lodge

To: Mayor and Council of Rockville
Re: Chestnut Lodge (Public Hearing of 4/25/2016)

JNP Chestnut Lodge, LLC for a proposal to amend **Project Plan Application PJT2015-00005**, Planned Residential Unit PRU2005-00022, to allow for seven (7) townhouse units instead of seven (7) multifamily units and approval of a height waiver from Section 25.14.07.d.4, to allow for the tower elements maximum height to not exceed 52 feet, where feet 40 feet is required in the equivalent zone (RMD-15), on the former Main Lodge property, Parcel "I".
Planner: Nicole Walters, 240-314-8215.

Testimony of:
Paul Newman
8 Henson Oaks Lane, Rockville, MD
President, Thirty Oaks Homeowners Association
(The Thirty Oaks community is adjacent to the subject property)

I would like to express our significant concerns about the townhouses that JNP Chestnut Lodge is proposing to build on the site of the former Chestnut Lodge main building (aka the Woodlawn Hotel). Briefly, our concerns include the following:

- 1) The footprint of the proposed building is much larger than that of the renovated and expanded building approved in the Chestnut Lodge PRU. The PRU stipulated a building there of a specific size, shape, and footprint. Such a sizable expansion to the footprint is not a minor change to the planned development and significantly alters the character of the site.
- 2) Instead of a finished, 4-sided building the proposed plan changes the west side into a back alley of 9 garage doors, vehicular parking, and trash bins. This is a material change to the character of the historic entry drive to the renovated Little Lodge, restored Ice House, and rebuilt Stable; a historic relationship and circulation pattern the original PRU was designed to preserve.

Not only will this back alley be visible to adjacent neighbors but it will also be seen by everyone traveling eastbound on West Montgomery Avenue, the historic West End gateway to the City. Again, this is a material change to the intent and requirements of the approved PRU, not a minor amendment.

- 3) The developer has presented no analysis or rationale for why a building meeting the approved plan cannot be constructed on this site.

I would like to acknowledge that I have met with the developer and his proposed design has evolved. He has made efforts to address many of the concerns that have been expressed. His architects, in fact, have done a masterful job of trying to address some of those concerns in exterior design elements.

In contrast, though, the proposed development has grown even larger than the original plan. First it was 6 townhomes, now it is 7. First respecting the iconic traffic circle at the entry, and now obliterating it.

We understand that something will be built there. There was a building there for over 100 years. We all knew there was a building there, and we all expected there to continue to be a building there. I don't think that's at issue here. The suggestion that perhaps it could be preserved as open space is a wonderful thought. But I think realistically everyone understands there was an intention of a building there, and that building is a central element of the chestnut lodge historic district. As such, whatever is built there should respect, represent, and honor the site's history, character, and relationship to other elements of the site and the community.

So perhaps we are asking the wrong question. Perhaps we're too busy talking about whether this is an acceptable application, if it meets the zoning codes, and if it seems reasonable. That's what we do for new construction. But we are in a PRU, and this is also a historic district. This PRU was hard fought. Compromises were made to preserve this property. Houses were approved and built with smaller lots and minimal setbacks.

So shouldn't we instead be asking the question: Why should anything change from the approved footprint and plan that were approved in the PRU?" Maybe the applicant should be showing us why that cannot be built. That would follow the spirit of the PRU and the plan. It seems to me we should be asking that question.

Thank you.

Sara Taylor-Ferrell

ATTACHMENT C

From: Allen Schiffenbauer <aschiffenbauer@gmail.com>
Sent: Tuesday, April 26, 2016 9:52 AM
To: Sara Taylor-Ferrell
Subject: RE: Comments on Chestnut Lodge

Happy to have this confirmation that you received my comments.

On Apr 26, 2016 9:44 AM, "Sara Taylor-Ferrell" <sferrell@rockvillemd.gov> wrote:

Mr. Schiffenbauer,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell

Acting City Clerk

City of Rockville

111 Maryland Avenue

Rockville, Maryland 20850

Office [240-314-8282](tel:240-314-8282)

Fax [240-314-8289](tel:240-314-8289)

From: Allen Schiffenbauer [mailto:aschiffenbauer@gmail.com]

Sent: Monday, April 25, 2016 10:16 PM

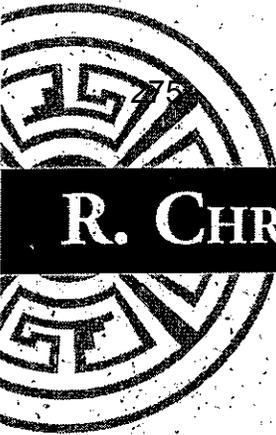
ATTACHMENT C

To: mayorcouncil <mayorcouncil@rockvillemd.gov>

Subject: Comments on Chestnut Lodge

Attached please find a copy of the remarks I made at the Mayor and Council session on 4/25

Allen Schiffenbauer



R. CHRISTOPHER GOODWIN & ASSOCIATES, INC.

cultural resource management and preservation planning

April 20, 2016

Elizabeth Hughes
Director / State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, Maryland 21032

Dear Ms. Hughes:

Neil Ziehl, Chief, Office of Planning, Education and Outreach, suggested that I contact you for technical assistance related to the application of the Secretary of the Interior's *Standards for Reconstruction*, the contexts appropriate for the approach, the degree of flexibility allowable in interpreting the *Standards*, and the level of documentation necessary to avoid conjecture and a false sense of history.

These issues have been raised in a case involving the former Chestnut Lodge Psychiatric Hospital, a monumental, four-story, brick building that was located in Rockville, Maryland. This building was proposed for rehabilitation for condominiums as part of a Planned Residential Development approved by the City of Rockville in 2006. The building was destroyed by fire in 2009 before substantive physical investigation and architectural documentation were completed. Further, architectural salvage and archeological investigation were not undertaken prior to the building remains being razed within 4 days of the fire. The City's Fire Marshal required immediate demolition/removal after determining that the remaining building structure was unsafe and posed an imminent threat to the safety of emergency service professionals attempting to completely extinguish the fire as well as to the general public residing within the general vicinity.

The property was listed in the National Register of Historic Places in 1975 and is part of the City of Rockville's West Montgomery Avenue Historic District. Narrative descriptions of the building and its historical significance survive, as do select historic photographs of the building, which was constructed in 1889 as the Woodlawn Hotel and repurposed as a hospital in the early twentieth century. Architectural plans are limited to schematic floor plans and building sections developed to illustrate the unit lay-out of the condominiums proposed in 2006. Documentation on the building is insufficient to support plans and specifications for reconstruction applying the Secretary's *Standards*.

241 East Fourth Street, Suite 100 Frederick, MD 21701
(301) 694-0428 Fax (301) 695-5237 frederick@rcgoodwin.com www.rcgoodwin.com

Frederick, MD

New Orleans, LA

Tallahassee, FL

Lawrence, KS

Las Cruces, NM

April 20, 2016

Page 2
276

ATTACHMENT C

The Chestnut Lodge Hospital was a significant and much beloved landmark in the City of Rockville. Its loss continues to be felt by a segment of the community who are advocating for the recreation of the hospital based on the general approximation of the design.

As you know, the City of Rockville is a Certified Local Government and has adopted the Secretary of the Interior's *Standards for the Treatment of Historic Properties* for the review of work within their historic districts. Our client, JNP Chestnut Lodge, LLC, acquired the property after the fire and has coordinated with the city's Historic Preservation Planner, Shelia Bashiri, and with the Historic District Commission (HDC) during two courtesy reviews (June 18, 2015; November 19, 2015) to develop a new building design for the site that is compatible with the district. The HDC has advised against any design that creates a false sense of historicism. A formal application for the HDC's review cannot be made until after the Mayor and Council's approval of an amendment to the 2006 Planned Residential Development which had called for the rehabilitation of the then-vacant hospital as condominiums.

JNP Chestnut Lodge, LLC currently is seeking said amendment. This process involves exhaustive staff review, recommendations from the Planning Commission following a public meeting, and final action by the Mayor and Council following a public meeting. It is anticipated that formal application for HDC review will be filed following resolution of this amendment.

Staff issued their report recommending conditional approval of the construction of a new building on March 2, 2016 and the Planning Commission meeting was held on March 9, 2016. Staff recommended against reconstruction of the Chestnut Lodge Hospital due to the potential for creating a false sense of history. Public testimony and discussion during the Planning Commission meeting suggested that a recreation of the hospital was an appropriate approach and that the Secretary of the Interior's *Standards*, while germane to the case, were open to liberal interpretation regarding the level accuracy in a reconstruction.

While I understand that the MHT cannot comment directly on the case, I am requesting a letter providing technical guidance from your office on the requirements of the *Standards for Reconstruction* and the role of the local HDC in interpreting those *Standards* to clarify the issues involved for the meeting with Mayor and Council. Unfortunately, the Mayor and Council are scheduled to hear the case during on April 25th; I anticipate that the record will remain open for a week after the meeting.

Thank you in advance for your assistance. I look forward to hearing from your office.

Sincerely,



Kathryn M. Kuranda, M.Arch.Hist.
Senior Vice-President

cc: JNP Chestnut Lodge, LLC

KMK/blb





ATTACHMENT C

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

David R. Craig, Secretary
Wendi W. Peters, Deputy Secretary

April 22, 2016

Kathryn M. Kuranda
Senior Vice President
R. Christopher Goodwin and Associates, Inc.
241 East Fourth Street, Suite 100
Frederick, MD 21701

Dear Ms. Kuranda:

I am in receipt of your inquiry regarding application of the Secretary of the Interior's Standards for Reconstruction, the contexts appropriate for this approach, the degree of flexibility allowable in interpreting this Standard, and the level of documentation required. This standard is one of four treatment standards included in the Secretary of the Interior's Standards for the Treatment of Historic Properties. These four standards are promulgated by the National Park Service in order to promote responsible preservation practices and address preservation, rehabilitation, restoration, and reconstruction activities.

In the experience of the Trust, the reconstruction treatment standard is applied to a construction project when the goal is to re-create vanished or non-surviving portions of a property – most typically for interpretive purposes. This treatment standard may only be employed successfully when sufficient documentary and physical evidence exists to permit accurate reconstruction with minimal speculation. If sufficient evidence does not exist to permit for an accurate reconstruction, then other types of interpretive methods should be pursued. Reconstruction is only recommended when this approach is essential to public understanding of a property.

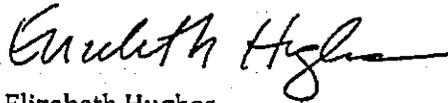
The first step in undertaking a reconstruction is development of a documentation plan. A thorough archeological investigation of the site where reconstruction is proposed is also required in most cases. These efforts are intended to satisfy the strict documentation requirements that serve as the basis for reconstruction projects as described in Standard #4:

4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.

The reconstruction standard provides little flexibility. Reconstructions based on conjecture do not meet the Secretary of the Interior's Standards for Reconstruction. A high level of documentation is required to meet the standard. At the same time, reconstructions must be clearly of their own time and clearly identified as contemporary re-creations.

For further information on application of the Secretary of the Interior's Standards for the Treatment of Historic Properties, I recommend you contact Brian Goekken, Chief of the Office of Technical Preservation Services at the National Park Service. He can be reached at (202) 354-2033 or brian_goekken@nps.gov.

Sincerely yours,



Elizabeth Hughes
Director
Maryland Historical Trust

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Thursday, May 05, 2016 9:31 AM
To: P & L Jennings; mayorcouncil
Subject: RE: look and feel of Rt 28 passing by Chestnut Lodge

P & L Jennings,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

-----Original Message-----

From: P & L Jennings [mailto:pax.jen@verizon.net]
Sent: Wednesday, May 04, 2016 9:50 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: look and feel of Rt 28 passing by Chestnut Lodge

When the city approved the Chestnut Lodge development, the decision was based on the concept that the look and feel from Rt 28 should stay the same, meaning that the view of the open space and the historic building footprint was paramount. The townhouse development proposal does not meet this standard.

Sara Taylor-Ferrell

280

~~ATTACHMENT C~~

From: Sara Taylor-Ferrell
Sent: Thursday, May 05, 2016 9:34 AM
To: jim@bullardfamily.org; mayorcouncil
Subject: RE: Chestnut Lodge History

Mr. Bullard,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: jim@bullardfamily.org [mailto:jim@bullardfamily.org]
Sent: Thursday, May 05, 2016 9:33 AM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Subject: Chestnut Lodge History

I am writing to object to the planned townhouse project to be built on the Thomas Street side of the Chestnut Lodge property. History needs to be preserved and to obliterate the open space and remove the historical site that references Chestnut Lodge is inappropriate. Sincerely James W. Bullard, MD , grandson of the founder of Chestnut Lodge

No to Townhouses at Chestnut Lodge

Petition published by Chestnut Lodge Committee of WECA on Aug 30, 2015

281

ATTACHMENT C

Background (Preamble):

A developer has proposed 7 townhouses at 500 W. Montgomery Ave., the Chestnut Lodge site, which requires a change to the approval of the Planned Residential Unit (PRU) for that overall development. The former Main Building at Chestnut Lodge Hospital, originally known as the Woodlawn Hotel, was perhaps the most significant historic building in Rockville.

The approved PRU development on the site of the former hospital was designed specifically to honor the history of both the building and the hospital. The Main building was to have been the centerpiece of the 7 acre historic district, giving the surrounding historic buildings context, both within the Chestnut Lodge site itself and in the greater W. Montgomery Historic District.

To facilitate this goal, which required maintaining the green space and gracious tree lawn along the West Montgomery frontage, a compromise was reached between the prior developer and The City which allowed the new houses to the rear in the non-historically designated portion of the PRU to be built more densely than would be allowed in the R-90 zone.

The Main building was to have been renovated with underground parking to preserve the iconic appearance and vistas from West Montgomery Ave. as well as from the other restored historic buildings behind it. Tragically, the Main building was destroyed by a fire in 2009, having stood empty for eight years.

While the original Main Building is now gone, that does not mean any structure, so long as it contains up to the 7 residential units approved for the site, should be allowed. We strongly believe it is imperative that any new building must: 1. Maintain the integrity of the approved PRU which honors the site's history, 2. Protect Rockville's cultural landscape, and 3. Preserve the historic view shed from all four sides.

This proposal places the side of the townhouse structure facing W. Montgomery, historically the front of the site. The backs of garages, surface parking, trash cans and the like would be placed along the west side of the site, clearly visible to all approaching from the west as well as from the residences to the west, south and north, including some in the historic district.

There are no other townhouses in the West Montgomery Historic District, along W. Montgomery Ave., nor were any allowed in the back of the new Chestnut Lodge development.

Townhouses in this area clearly do not preserve Rockville's cultural landscape, the historic view shed, nor would they do anything to speak to the history of this site.

Petition Text:

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.

2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

#	Title	FirstName	Surname	Email	Address	Town/City	S/C/P	Region	Zip/PC	Commen	Date
46	Mr.	Frederick	Graboske	eksobarg@lycos.com	101 N Van Buren St.	Rockville	MD	N/G	N/G	N/G	Nov 09, 2015
47	Mr	Josh	Noda	jkn4676@yahoo.com	N/G	N/G	N/G	N/G	N/G	N/G	Nov 06, 2015
46	N/G	Nicole	hammond	nicolehammond@comcast.net	N/G	N/G	N/G	N/G	N/G	View	Oct 19, 2015
45	MD	Diane	Kilcoyne	dpkilcoyne@yahoo.com	N/G	N/G	N/G	USA	N/G	N/G	Oct 19, 2015
44	Mr	Patrick	Schoof	patrick@patrickshoof.com	N/G	N/G	N/G	USA	N/G	View	Oct 15, 2015
43	Ms.	Elizabeth A.	Reed	eareed1@gmail.com	100 Thomas Street	Rockville	Maryland	Canada	20850	View	Oct 14, 2015
42	Mrs	Lauri	Shapiro	lshapiro526@gmail.com	533 Brent Road	Rockville	MD	USA	20850	View	Oct 06, 2015
41	Mr	Matthew	Shapiro	matt@e-shapiro.com	533 Brent Rd	Rockville	MD	USA	20850	N/G	Oct 06, 2015
40	N/G	Jessica	Smith	smith.jmott@gmail.com	N/G	N/G	N/G	N/G	N/G	N/G	Oct 04, 2015
39	N/G	Benjamin	Smith	benpsmith@gmail.com	N/G	N/G	N/G	N/G	N/G	N/G	Oct 04, 2015
38	Ms	Phyllis Hull	Alturk	akturkph@gmail.com	N/G	N/G	N/G	N/G	N/G	View	Oct 02, 2015
37	Mr	Oren	Fromberg	orenfromberg@gmail.com	N/G	N/G	N/G	N/G	N/G	N/G	Sep 27, 2015
36	Dr	Laurie	Fromberg	lauriefromberg@gmail.com	N/G	N/G	N/G	N/G	N/G	N/G	Sep 27, 2015
35	N/G	Keith	Jacobson	keith.jacobson305@gmail.com	119 Forest	N/G	N/G	N/G	N/G	N/G	Sep 25, 2015
34	N/G	Katherine	Michaelian	kmichaelian91@gmail.com	119 Forest	N/G	N/G	N/G	N/G	N/G	Sep 25, 2015
33	Mr	Robert	Gale	rob.cgale@verizon.net	108 w. Argyle st	Rockville	Md	USA	20850	View	Sep 24, 2015
32	N/G	JONATHAN	WALSH	jonrwalsh@yahoo.com	410 AUTUMN WIND WAY	ROCKVILLE	MD	N/G	20850	N/G	Sep 21, 2015
31	Mr	Douglas	Lunenfeld	dlunenfeld@gmail.com	N/G	N/G	N/G	N/G	N/G	View	Sep 21, 2015
30	Mr.	Rusty	Morgan	rustymorgan@mris.com	103 N Van Buren Street	Rockville	md	USA	20850	N/G	Sep 21, 2015
29	Mr	Luc	Hale	lucjameshale@gmail.com	310 mannakee st	Rockville	MD	USA	20850	View	Sep 20, 2015
28	N/G	Pat	Dowler	patsdowler@aol.com	620 Anderson Ave	Rockville	N/G	N/G	20850	N/G	Sep 20, 2015
27	Mr	Bruce	Plunkett	btpet@comcast.net	419 west Montgomery ave	Rockville	N/G	USA	N/G	N/G	Sep 20, 2015
26	Mrs	Jeanne	Omeara	jeanne.omeara@timelife.com	419 west Montgomery ave	Rockville	N/G	USA	N/G	N/G	Sep 20, 2015
25	N/G	Casey	McCants	caseymccants@yahoo.com	N/G	N/G	N/G	N/G	N/G	N/G	Sep 19, 2015

#	Title	FirstName	Surname	Email	Address	Town/City	S/C/P	Region	Zip/PC	Commer	Date
283	Mr.	Andrew	Sellman	sellmana@verizon.net	411 West Montgomery Ave	Rockville	MD	USA	20850	View	Sep 08, 2015
1	N/G	Marian	Hull	marian.hull@verizon.net	529 Brent Rd	Rockville	MD	USA	20850	View	Sep 04, 2015

- * N/C - field not collected by the author
- * N/G - not given by the signer
- * S/C/P - State, County or Province
- * PC - Post Code
- * View - view comment

100-year old aspect of Rockville's history! I am a 4th generation resident of Rockville, and my Great Grandparents came to Rockville before 1890 for a summer-escape from the heat and congestion of D.C., staying at the Woodlawn Hotel which was the original use of the Chestnut Lodge building. It would be an enormous misuse to now put townhouses with presentation of the rear of the structure viewable from West Montgomery Avenue, along with their back porches, garbage cans, etc. All of which in no way references the Lodge's character or history. Please do not let this happen!!!

42 Lauri Shapiro

[Back to signature list](#)

I'm not opposed to the redevelopment of the property, but I do not think townhouses are the right fit for the Historic District of Rockville. I hope the City, Neighbors and Developer can work together to agree on an aesthetically pleasing and mutually beneficial use for the property.

38 Phyllis Hull Alturk

[Back to signature list](#)

Worked part time in reception from 1966-1971. So sad to see original building gone! Would like to see a park there!

33 Robert Gale

[Back to signature list](#)

I support development of the property, but should be an extension of the current homes on Bullard Circle. Back yards should NOT be visible from Montgomery Ave. Treat same as Henson Oaks Lane with end homes facing Montgomery Ave

31 Douglas Lunenfeld

[Back to signature list](#)

The fire was questionable as to how and who started it and Rockville lost a landmark. 7 townhouses does nothing in keeping with the landmark. They should rebuild the old building if anything and go with the original plans or do nothing at all

29 Luc Hale

[Back to signature list](#)

No thank you

24 Nadia Azumi

[Back to signature list](#)

I strongly oppose the re development of the Chestnut Lodge. In fact it would be better to have the old Hotel rebuilt there.

22 Bill Burchett

[Back to signature list](#)

No to sideways facing townhouses. Yes to reconstructing the original building as condos.

19 Francis Parks

[Back to signature list](#)

I am against allowing townhouses in this property.

12 Terrel Hale

[Back to signature list](#)

This new development is ridiculous! We already are having trouble getting out of our neighborhood on to West Montgomery. The traffic already is unbearable. The people that make these kinds of decisions really need to live in the neighborhood!

9 joanne snyder

[Back to signature list](#)

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.
2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration. Signed: _____

Signature _____ Print Name _____ Address: _____ Street _____ City/Town _____ State/County _____ ZIP _____

Robert Treseler 109 N Van Buren St Rockville MD 20851

Jennifer Treseler 109 N Van Buren St Rockville MD 20851

William H. Heston 102 N. Van Buren St Rockville MD 20850

Corbin 102 N. Van Buren St Rockville MD 20850

Henry Black 105 N. Van Buren St, Rockville MD 20850-1860

Maime Black 105 N Van Buren St Rockville, Md. 20850 West.

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE

This petition was started by Chestnut Lodge Committee of West End Citizens' Association 30 August 2015

WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.

2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration.

Signed:

Signature	Print Name	Address	Street	City/Town	State/County	ZIP
<i>[Signature]</i>	Jessica Speicher	7510 Damascus Rd	Lanham	MD	20882	
<i>[Signature]</i>	Christina Conway	1201 Mount Arney Rd	Brookville	MD	20833	
<i>[Signature]</i>	Amy Bills	12439 Ansin Circle Dr	Potomac	MD	20854	
<i>[Signature]</i>	KATHY KNISHT	19559 GATSBY TRK.	OWESY	MD	20832	
<i>[Signature]</i>	Laura Barnett	6418 Lake Verana Drive	Gaithersburg	MD	20878	
<i>[Signature]</i>	KATALINA PRISAF	7859 Titonkaway	Rockville	MD	20855	
<i>[Signature]</i>	Matthew Geavis	13224 Levensdale Rd	Clarkshury	MD	20871	

PETITION: NO TO TOWNHOUSES AT CHESTNUT LODGE
 This petition was started by Chestnut Lodge Design Committee of West End Citizens' Association 30 August 2015

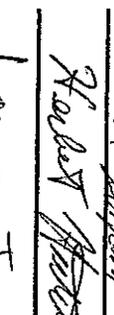
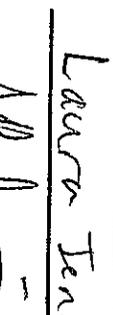
WEBSITE: <http://www.gopetition.com/petitions/not-townhouses-at-chestnut-lodge>

Given neither the Master Plan, the PRU, nor the Chestnut Lodge Design Guidelines anticipated the total loss of the Main Building there is no solid guidance for this property. We respectfully request two things of the Mayor and Council:

1. Deny this application to modify the existing PRU for Chestnut Lodge. There are likely many possible structures and creative uses that would be appropriate on this site, but this proposal is not it. To fill the site now with a sideways stick of townhouses would foreclose any future opportunity to thoughtfully find the solution that will adequately preserve and honor this historic site.

2. Begin a City lead process to engage Rockville residents and all other stakeholders to define a vision for the site that would fulfill the original goals of the existing PRU and historic district.

Thank you for your consideration. Signed:

Signature	Print Name	Address:	Street	City/Town	State/County	ZIP
	John Marshall	102	Alexander Rd	Rockville	MD	20850
	SAM ARSED	705	Roxboro Rd	Rockville	MD	20850
	MARK GROSSMAN	214	Roxboro Rd.	Rockville		20850
	E. Martin	716	Roxboro Rd	Rockville	MD	20850
	ROBERT HURD	708	Roxboro Rd	Rockville	MD	20850
	Laura Jennings	702	Roxboro Rd	Rockville	MD	20850
	G. Patricke Jennings	702	Roxboro Rd	Rockville	MD	20850

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Friday, May 06, 2016 12:21 PM
To: Margaret Burke; mayorcouncil
Cc: Jim Wasilak; Sheila Bashiri; 'jproakis@jnpcap.com'; SLCho; 'kkuranda@rcgoodwin.com'; Stephen Orens; Lori Douglas
Subject: RE: Chestnut Lodge Project Plan Amendment PJT 2015-00005

Ms. Burke,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Margaret Burke [mailto:MBurke@mcmillanmetro.com]
Sent: Friday, May 06, 2016 11:54 AM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Cc: Jim Wasilak <jwasilak@rockvillemd.gov>; Sheila Bashiri <sbashiri@rockvillemd.gov>; 'jproakis@jnpcap.com' <jproakis@jnpcap.com>; SLCho <SLCho@mmcanby.com>; 'kkuranda@rcgoodwin.com' <kkuranda@rcgoodwin.com>; Stephen Orens <SOrens@mcmillanmetro.com>; Lori Douglas <LDouglas@mcmillanmetro.com>
Subject: Chestnut Lodge Project Plan Amendment PJT 2015-00005

Dear Mayor Newton, Councilmember Feinberg, Councilmember Onley, Councilmember Carr and Councilmember Pierzchala,

Please see attached Stephen Orens' letter and memorandum concerning the Chestnut Lodge Project Plan Amendment PJT 2015-00005. Originals of the letter and memorandum will be delivered to you today by courier.

Thank you.

Margaret Burke, Legal Assistant
McMillan Metro, P.C.
ATTORNEYS AT LAW

1901 Research Boulevard
Suite 500
Rockville, MD 20850
p. (301) 251-1180
d. (240) 778-2328
f. (301) 251-0447
www.mcmillanmetro.com

ATTACHMENT C

INFORMATION CONTAINED IN THIS E-MAIL IS ATTORNEY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. THE REVIEW, DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION TO ANYONE OTHER THAN THE INTENDED ADDRESSEE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS MESSAGE IN ERROR, PROMPTLY NOTIFY THE SENDER BY RETURN EMAIL AND PERMANENTLY DELETE THIS MESSAGE FROM YOUR COMPUTER. THANK YOU.

 Please consider the environment before printing this email.

May 6, 2016

VIA REGULAR MAIL

VIA ELECTRONIC MAIL:

The Honorable Bridget Donnell Newton, Mayor
The Honorable Beryl L. Feinberg, Councilmember
The Honorable Virginia D. Onley, Councilmember
The Honorable Julie Palakovich Carr, Councilmember
The Honorable Mark Pierzchala, Councilmember
111 Maryland Avenue
Rockville, Maryland 20850

Stephen J. Orens
Of Counsel

Direct: 240-778-2324
sorens@mcmillanmetro.com

Maryland Bar
District of Columbia Bar

Re: Memorandum in Support of the Chestnut Lodge
Project Plan Amendment PJT 2015-00005

Dear Mayor Newton and
Councilmember Feinberg,
Councilmember Onley
Councilmember Carr
Councilmember Pierzchala

We, Stephen J. Orens and McMillan Metro, P.C., are co-counsel with Soo Lee-Cho and Miller, Miller & Canby representing JNP Chestnut Lodge, L.L.C in connection with the above referenced application to amend the approved project plan for Chestnut Lodge.

Enclosed please find our Memorandum requesting that the Mayor and City Council approve the Project Plan Amendment enabling the Applicant to move forward with the approved land use at the approved density by removing the requirement that the seven (7) approved condominium dwelling units be located in the Main Lodge building that was destroyed in 2009.

Sincerely,

MCMILLAN METRO, PC



Stephen J. Orens

SJO/mrb

Encl.

cc: James Wasilak, Rockville Chief of Planning
Sheila Bashiri, Rockville Preservation Planner
James N. Proakis, JNP Capital Management, LLC
Soo Lee-Cho, Esquire, Miller, Miller & Canby, Chartered
Kathryn M. Kuranda, Senior Vice President, R. Christopher Goodwin & Associates, Inc.

McMillan Metro, P.C.

ATTORNEYS AT LAW

1901 Research Boulevard, Suite 500, Rockville, Maryland 20850-3168
p 301.251.1180 • f 301.251.0447
www.mcmillanmetro.com

MEMORANDUM

To: THE MAYOR AND CITY COUNCIL OF ROCKVILLE

From: STEPHEN J. ORENS

Re: CHESTNUT LODGE PROJECT PLAN AMENDMENT PJT 2015-00005

Date: May 6, 2016

MEMORANDUM IN SUPPORT OF AMENDMENT

The following Memorandum is submitted on behalf of the Applicant, JNP Chestnut Lodge LLC in coordination with the memorandum submitted by Soo Lee-Cho and Miller, Miller & Canby and the letter submitted by Kathryn M. Kuranda in support of approval of the proposed Amendment.

I. Relevant Facts.

The Chestnut Lodge PRC exploratory application was approved by the Mayor and City Council on February 6, 2006 for a 44 unit residential development on the 20.43 acre property known as "Chestnut Lodge." 7.9 acres of the 20.43 acre site are located in the West Montgomery Historic District and was the site of the main Chestnut Lodge Hospital facility known as the "Main Lodge."

The approved "Land Use" for the 20.43 acre Chestnut Lodge property adopted by the Mayor and City Council by Resolution No. 3-06, required that:

The development shall consist of not more than 36 new single family detached dwelling units with detached garages and other accessory structures, **7 residential condominium units (in the Main Lodge building)** and two rehabilitated buildings (Little Lodge and Frieda's

Cottage) each to be used as single family detached homes.” Resolution No. 3-06, Page 8.) (Emphasis added.)

The 36 approved detached dwelling units were built, sold and are now owner occupied. The 1.68 acre Parcel I approved for 7 residential condominium units became vacant as a result of the fire that destroyed the “Main Lodge” and remains vacant today.

The development standards adopted by the Mayor and City Council by Resolution No. 3-06, required that the Main Lodge located on the 1.68 acre recorded parcel, “Parcel I” contain “**residential condominium units.**” (Resolution 3-06, Page 11.) (Emphasis added.)

Both the approved Land Use Standards and the approved Development Standards identify residential condominium units as the approved land use for Parcel I.

The Main Lodge was destroyed by fire in 2009 rendering compliance with the condition requiring that the 7 condominium units be “in the Main Lodge building” an impossibility.

Because the 7 residential condominium units were intended to be located in the rehabilitated and renovated Main Lodge building the condominium unit type was assumed to be multi-family. However, neither the land use designation nor the development standards established for Chestnut Lodge by the approval resolution restrict the development of Parcel I to multi-family units. The only development requirement for Parcel I pertained to the conversion of the now destroyed Main Lodge building to residential use, a requirement that became impossible to fulfill.

II. The Requested Amendment.

JNP Chestnut Lodge, LLC, (the “Applicant”) the owner of Parcel I, has requested that the Mayor and City Council amend the approved exploratory application to delete the requirement that the 7 condominium units be located in the Main Lodge building and permit development of the 7 condominium units as attached dwelling units in a structure that would sympathetically replace the Main Lodge building that was destroyed by fire.

Approval of the requested amendment will enable the Rockville Historic District Commission to conduct formal proceedings that will assure that the approved design of the 7 attached unit structure is appropriate for the West Montgomery Historic District, without creating the false sense of history that would result from the replacement of the destroyed Main Lodge building with a replica.

III. Compliance with the Secretary of the Interiors Standards.

Significantly, one of the principles upon which the Secretary of the Interior's Standards for Preservation Planning is based is that "important historic properties cannot be replaced if they are destroyed." (See the Secretary of the Interior's Standards for Historic Preservation Planning page 1.)

As stated in a separate submission by the Applicant's historic preservation consultant and architectural historian, Kathryn M. Kuranda of R. Christopher Goodwin & Associates, Inc, a requirement that it reconstruct the Main Lodge would violate the Standards established by the Secretary of the Interior, standards which the Mayor and City Council are statutorily required to follow as a Certified Local Government.

IV. The Governing Legal Standards and the Substantial Evidence of Record.

The regulatory process by which the original Chestnut Lodge PRU approval may be amended requires that the Mayor and City Council conduct a public hearing for the purpose of receiving oral testimony and written submissions that form the evidence of record upon which the decision must be based. The relevant factual testimony and evidence of record before the Mayor and City Council compels approval of the requested amendment to eliminate the requirement that the 7 condominium units approved for Parcel I be located in a building that was destroyed by fire and therefor no longer exists.

The catastrophic loss of the Main Lodge building on Parcel I could not have been anticipated when the Mayor and City Council approved the original PRU Application. It was expected that the "7 residential condominium units" would reside in a renovated Main Lodge structure with some of the units sharing entry points and hallways, making some of the units "multi-family" in nature by default under applicable building codes. The use of the term "multi-family" interchangeably in the approval Resolution, however, does not limit the PRU approval to that singular type of residential use.

Parcel I is a distinct recorded, buildable parcel classified in a zoning category that permits attached single family dwellings and the approved land use for Parcel I is 7 residential condominium dwelling units, not 7 multi-family units. The unrefuted evidence in support of the requested amendment adduced at the public hearing before the Mayor and City Council, includes the recommendation of approval from the Planning Staff and the positive courtesy site and building design reviews by the Historic District Commission, in addition to the testimony

and power point presentation by Soo Lee-Cho, Esquire and Kathryn M. Kuranda. None of the witnesses who testified in opposition presented any credible evidence to support a denial, to support construction of a replica or to support what is really desired by some who are opposed to this application that the City require the Applicant to leave the property vacant.

While the anger and disappointment at the destruction of the historic Main Lodge is understandable it is not a legally sustainable factual basis for the perpetuation of a development requirement that was rendered an impossibility by subsequent events. It is no longer possible to modify the interior of the Main Lodge to accommodate individual dwelling units. The destruction of the Main Lodge however, did not render Parcel I undevelopable under either the Zoning Ordinance or the approved PRU. A refusal to approve a plan acceptable to the Historic District Commission ("HDC") and recommended by the Planning Staff that proposes the same number of condominium dwelling units as originally approved would be arbitrary and unsustainable.

None of the witnesses who testified in opposition at the public hearing refuted the factual evidence produced by the Applicant and the Planning Staff regarding compliance with the standards and requirements of the Zoning Ordinance and it is the Zoning Ordinance requirements that govern the action to be taken by the Mayor and City Council.

Virtually all of the testimony presented at the public hearing in opposition to the approval of the PRU amendment focused on the historical significance of Chestnut Lodge to the modern day practice of psychiatry. Without question, the Doctors Bullard deserve the recognition they have been afforded and without question the Bullard family and Chestnut Lodge influenced society and significantly contributed to the history of the City of Rockville.

None of the opposition witnesses testifying before the Mayor and City Council identified architecture as a basis for requiring this developer to build a replica of the destroyed Main Lodge to house the 7 condominium dwelling units previously approved for Parcel I.

It is important to recall that the evidence before the Mayor and City Council includes documentation of the exterior modifications to the original hotel structure when the hotel was converted to a psychiatric hospital. It is also worthy of consideration that the approved PRU envisioned additional exterior modifications to the Main Lodge that, like the present Applicant's proposed attached dwelling unit plan, included structural elements reminiscent of the Chestnut Lodge period.

The answer to the zoning and land use question before the Mayor and City Council cannot be found in the opposition testimony about Dr. Bullard and the operation of Chestnut Lodge. The questions before the Mayor and Council are land use and zoning questions and the answers are found in the Zoning Ordinance. Because Parcel I is in the West Montgomery Historic District, building and site design must be approved by the HDC due to its location in the West Montgomery Historic District, even though the Main Lodge, which was the defining feature of the Chestnut Lodge, is no longer there.

The City of Rockville is a Certified Local Government having a State approved system of historic preservation that allows the City to participate in State and Federal grants and tax incentive programs. The City has established a HDC as authorized by State Law to administer the City's regulations governing historic districts, sites and resources. It is the HDC's statutory duty to determine the appropriate level of scrutiny and then approve, modify or reject new development within the Historic District.

It is not for the Mayor and City Council to usurp the jurisdiction of the HDC and determine the level of scrutiny appropriate for consideration of new construction on Parcel I, a no-longer contributing resource. That determination is the province of the HDC and is exclusively within the HDC's jurisdiction just as zoning and land use are exclusively in the jurisdiction of the Mayor and City Council.

The Mayor and City Council needs to approve the land use and zoning elements of the requested amendment and forward the development proposal to the HDC without imposing conditions that would unduly restrict the HDC's jurisdictional judgment or endanger Certified Local Government [CLG] Certification. (See Section B. 7 of the requirements for local government CLG certification.)

We submit that it would be arbitrary for the Mayor and City Council to refuse to amend the PRU requirement that the approved 7 condominium units be located in a building that no longer exists thereby depriving the property owner of all beneficial use of Parcel I and denying the property owner of its investment backed expectation of development in accordance with applicable regulations.

Neither a denial of the requested amendment nor a requirement to replicate the Main Lodge that was destroyed by fire would be sustainable in court. Failure to act in order to "wait and see what might happen next" would be a taking requiring the payment of just compensation under State Law governing inverse condemnation.

Inaction by a local government body has been found by the Maryland Appellate Courts to constitute inverse condemnation where, as here, inaction results in a total deprivation of the right to use property.

According to the Court of Appeals in *Litz v. Maryland Department of the Environment*, 446 Md. 254, 131 A3d 923 (2016), inverse condemnation is “a shorthand description of the manner in which a landowner recovers just compensation for a taking of his property when condemnation proceedings have not been instituted.” Refusing to amend the PRU and allow the Applicant to develop Parcel I in accordance with the applicable zoning standards consistent with the City’s Master Plan would constitute a taking under Maryland law. (See *Litz* p. 12.)

Inverse Condemnation will be found and the property owner compensated when a governmental agency fails to act when it had an affirmative duty to act.

When inaction of a governmental agency effectively denies a property owner of the physical or economically viable use of the property the Courts will find that a taking has occurred and that the property owner has been denied due process. (See *Litz* p13)

V. Conclusion

Approval of the proposed development of Parcel I with 7 attached residential condominium dwelling units is, under the circumstances, the best possible result and the most appropriate way to pay homage to the historical memory of Chestnut Lodge. The proposed development will be visually reminiscent of the Main Lodge with structural elements reminiscent of the Main Lodge.

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Friday, May 06, 2016 1:41 PM
To: Sharon A. Little; mayorcouncil
Cc: Jim Wasilak; Sheila Bashiri; jproakis@jnpcap.com; SLCho; ldouglas@mcmillanmetro.com; sorens@mcmillanmetro.com
Subject: RE: Letter in support of the Chestnut Lodge Submitted by Kathryn Kuranda

Ms. Little,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

Sara Taylor-Ferrell
Acting City Clerk

City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850
Office 240-314-8282
Fax 240-314-8289

From: Sharon A. Little [mailto:slittle@rcgoodwin.com]
Sent: Friday, May 06, 2016 1:39 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Cc: Jim Wasilak <jwasilak@rockvillemd.gov>; Sheila Bashiri <sbashiri@rockvillemd.gov>; jproakis@jnpcap.com; SLCho <SLCho@mmcanby.com>; ldouglas@mcmillanmetro.com; sorens@mcmillanmetro.com
Subject: Letter in support of the Chestnut Lodge Submitted by Kathryn Kuranda

Dear Mayor Newton, Councilmember Feinberg, Councilmember Onley, Councilmember Carr and Councilmember Pierzchala,

Please see attached Kathryn M. Kuranda's letter and attachments concerning the Chestnut Lodge Project Plan Amendment PJT 2015-00005.

Thank you,

Sharon A. Little

Administrative Coordinator

298

ATTACHMENT C

R. Christopher Goodwin & Associates, Inc.

241 East Fourth Street, Suite 100

Frederick, Maryland 21701

(301) 694-0428

(301) 695-5237 fax

www.rcgoodwin.com

This message is the property of R. Christopher Goodwin & Associates, Inc. (RCG&A). It is intended for the named recipient(s) only. Its contents (including any attachments) may be confidential, legally privileged or otherwise protected from disclosure by law. Unauthorized use, copying, distribution or disclosure of any part of it may be unlawful and is strictly prohibited. RCG&A assumes no responsibility and does not accept liability for any errors or omissions which are a result of this email transmission. If you have received this message in error, please notify us immediately by reply email to the sender and confirm that the original message and any attachments and copies have been destroyed and deleted from your system.

R. CHRISTOPHER GOODWIN & ASSOCIATES, INC.

cultural resource management and preservation planning

May 6, 2016

VIA ELECTRONIC MAIL

The Honorable Bridget Donnell Newton, Mayor
The Honorable Beryl L. Feinberg, Councilmember
The Honorable Virginia D. Onley, Councilmember
The Honorable Julie Palakovich Carr, Councilmember
The Honorable Mark Pierzchala, Councilmember
111 Maryland Avenue
Rockville MD 20850

RE: Project Plan PJT2015-00005 for the amendment of the Chestnut Lodge Planned Residential Unit (PRU2005-00022)

Dear Mayor Newton and
Councilmember Feinberg
Councilmember Onley
Councilmember Carr
Councilmember Pierzchala

Thank you for the opportunity to provide additional information for the public record in the consideration of the amendment to the Chestnut Lodge PRU by the Mayor and Council. My firm, R. Christopher Goodwin & Associates, Inc., was retained by the applicant, JNP Chestnut Lodge, LLC, as the preservation consultants in this case and provided expert testimony in the current hearings. I have particular knowledge and experience with the Chestnut Lodge property having served as the architectural historian on the development team for the Chestnut Lodge PRU in 2006. My professional qualifications exceed those established by the Secretary of the Interior in architectural history. A copy of my curriculum vitae is attached for your reference.

Chestnut Lodge was a significant local landmark in the West Montgomery Avenue Historic District. The Chestnut Lodge fire in 2009 was a tragedy for all of Rockville. The historic building was destroyed and a non-renewable historic resource was lost.

The now empty site remains a part of the West Montgomery Avenue Historic District. JNP Chestnut Lodge, LLC has worked with staff and the Historic District Commission (HDC) to develop a compatible new design for over a year. The JNP Chestnut Lodge, LLC team has consulted formally with the HDC through two courtesy reviews and anticipates that application for formal HDC review will be filed following resolution of the current request for amendment.

As you know, the HDC applies the Secretary of the Interior's *Standards for the Treatment of Historic Properties* in its deliberations. These *Standards* were developed to promote responsible preservation practice to support the protection of our nation's irreplaceable cultural resources. Four treatment approaches are recognized under the *Standards*: preservation, rehabilitation, restoration, and reconstruction.

241 East Fourth Street, Suite 100 Frederick, Maryland 21701

(301) 694-0428

Fax (301) 695-5237

frederick@rcgoodwin.com

www.rcgoodwin.com

New Orleans, LA

Lawrence, KS

Frederick, MD

Tallahassee, FL

Las Cruces, NM

- Preservation is defined as the process of sustaining the existing form, integrity, and materials of an historic property.
- Rehabilitation makes possible a compatible use for an historic property through repair, alteration, and addition while preserving those portions or features that convey historical, cultural, or architectural values. The City of Rockville applies the *Standards for Rehabilitation* in the HDC review of exterior changes to resources within their historic districts under the Certified Local Government Program. These *Standards* also are referenced in the *Chestnut Lodge Design Guidelines* adopted by the City on May 24, 2004.
- Restoration is the process of accurately returning the form, features, and character of a property to a particular time in its history.
- Reconstruction is the process of accurately depicting the form, features, and detailing of a non-surviving resource as it appeared at a specific period in its history.

The relative importance of the building to our nation's history, the physical condition of the resource, proposed use, and mandated code requirements are considered in selecting the appropriate treatment strategy. New construction is addressed under both the *Standards for Rehabilitation* and the *Standards for Reconstruction*. The *Standards for Rehabilitation* allow for new construction within historic districts that are compatible in materials, features, size, scale, proportion, and massing to protect the integrity of the district and its environment. The HDC applies the *Standards for Rehabilitation* for new construction within the City's historic districts.

The *Standards for Reconstruction* govern the contemporary, accurate depiction of a building from a particular period when it is required to understand and interpret a property's historic value, when no other property survives with the same associative value, and when sufficient historical documentation exists to ensure an accurate reproduction. Reconstruction is a treatment strategy that is very rarely adopted due to its limited application, high standards for accuracy, and potential for creating a false sense of history. The facts related to the Main Lodge do not meet the requirements necessary to justify a reconstruction.

Interpretation of Historic Value. Buildings required to understand and to interpret a property's historic value generally are restricted to museum contexts, such as in the example cited in testimony during the public hearing at Appomattox Court House National Historical Park in Virginia where reconstructed buildings are actively interpreted by the National Park Service through a living history program. The active interpretation of a property's historic value rarely is possible or appropriate in a private property context such as the present case.

The two other properties offered as examples of reconstructions during the April 25th hearing are not comparable to the Chestnut Lodge case. The Blackfriars Playhouse of the American Shakespeare Center in Staunton, Virginia is an interior theatre space incorporated into a contemporary building. The 300-seat theatre recreates the staging conditions of a renaissance theatre. All Hallows' Church in Anne Arundel County was constructed ca. 1710 and listed in the National Register of Historic Places in 1969 for the quality of its intact 18th century exterior design. The interior of the church was damaged by fire in 1727 and in 1940. The 1940 work on the interior of the church is an accurate restoration to the period of ca. 1710 supported by historical and physical evidence. Neither the Blackfriars Playhouse nor All Hallows' Church are reconstruction projects undertaken in accordance with the *Secretary of the Interior's Standards*. Blackfriars Playhouse is an example of a new building that incorporates an interior theatre space that is a re-creation of Shakespeare's original theatre. All Hallows' Church is an intact 18th century church that includes an accurately restored interior and not a reconstruction.

Properties of Sole Associative Value. Chestnut Lodge was important for its construction as the Woodlawn Hotel in 1889 and for its association with the Chestnut Lodge Sanitarium from 1908 – 1996. The appear-

ance, historical integrity, and significance of the building at the time of its loss was most closely associated with the period 1908 – 1996, as reflected in the public testimony that focused on the historical importance of the property as part of the psychiatric hospital complex from this period. The contributions of the Chestnut Lodge Sanitarium in advancing psychiatric care and particularly the national importance of the work of Dr. Frieda Fromm-Reichmann at the facility are well documented. Dr. Fromm-Reichmann's residence at Chestnut Lodge, now owned by Peerless Rockville, survives and is preserved. Frieda's Cottage possesses an historical association and associative value to the Chestnut Lodge Sanitarium as did the Main Lodge. The high degree of importance of these two buildings was recognized in the hierarchy of historic properties developed in the *Chestnut Lodge Guidelines*. Frieda's Cottage and the Main Lodge possess the same associative value. **The Main Lodge does not meet the sole property criterion as required for consideration for reconstruction.**

Documentation to Support Accurate Recreation. The necessity for historical accuracy in applying the Secretary's *Standards for Reconstruction* has been discussed at length. Testimony suggested that the *Standard* allow flexible interpretation of the original design, materials and construction techniques of the Main Lodge in a reconstruction. I sought clarification on the degree of flexibility allowable for reconstructions within historic districts from Ms. Elizabeth Hughes, Maryland State Historic Preservation Officer. Ms. Hughes, Director of the Maryland Historical Trust, provided technical assistance on this issue in correspondence dated April 22, 2016 and affirmed that a high level of historical accuracy is required in a reconstruction meeting the *Secretary's Standards*. Copies of this correspondence are attached for your reference.

As noted in the hearing testimony provided by respected local historian, Eileen McGuckian, a wealth of historical data exists on the history of Chestnut Lodge including articles, oral histories, memoirs, photographs, National Register nominations, archeological surveys, architectural inventories, and schematic architectural drawings developed to support the 2006 discussions on rehabilitation. Much of this data relates to the historical events associated with Chestnut Lodge rather than to the design, materials, systems, and ornamentation found on the building. While the existing historic data does provide a picture of the overall appearance of Chestnut Lodge, it does not provide the level of detail necessary to support full exterior, let alone any interior plans, and specifications for the reconstruction of the massive, four-story, brick masonry building. The intensive building investigations required to document changes and modifications to the building over time and to record the design, materials, and construction of the full range of architectural elements contained in the building were not completed prior to the fire. While the general appearance of the building is known and documented through narrative descriptions and photographs, **the level of detail to enable reconstruction is lacking. The conjecture involved in any attempt to reconstruct Chestnut Lodge to some undetermined date in its history would, in my professional opinion, not comply with the Standards for Reconstruction.**

In their April 20th letter, Peerless Rockville questioned the overall appropriateness of townhouses within the historic district while also arguing that the site requires a building of monumental institutional scale. While single family may be a common use in the West Montgomery Avenue Historic District, the Chestnut Lodge site is unique and demands a design that respects the historicity of its context, its importance as a focal point for the surviving elements of the campus, and its prominence within the historic district. The historic lodge has been lost, but the economic challenges of long-term sustainability that plagued the former hospital are relevant to any viable new design. Townhouse use, within a building designed to read as a unified whole, meet these site challenges and economic realities. I agree with Peerless Rockville and with Ms. McGuckian that a new high quality, compatible building is achievable on this site. The applicant is committed to working with the HDC and the preservation community to achieve a compatible, approvable and sustainable design.

Testimony before the Mayor and Council underscored the importance of the Chestnut Lodge Sanitarium to Rockville's local history and referenced numerous materials in public and private collections related to the events at Chestnut Lodge Sanitarium. Consultation of these materials into a publicly assessable archive dedicated to the history of Chestnut Lodge would be a lasting asset to the community. Frieda's Cottage was initially requested to be considered for use as a library or museum under the original PRU. Re-use of Frieda's Cottage as a museum dedicated to the history of the Chestnut Lodge Sanitarium may warrant reconsideration as a location for the archive. In light of the volume of historical information brought forward in this case, it is recommended that the stakeholders (JNP Chestnut Lodge LLC, City of Rockville, Peerless Rockville, and the public) come together to create such a lasting asset for the community. JNP Chestnut Lodge LLC, would be committed to participating in a meaningful way towards such an effort.

Thank you again for your well-considered deliberation in this case.

Sincerely,



Kathryn M. Kuranda, M. Arch.Hist.
Senior Vice President

KMK/sal

Enclosures:

Curriculum Vitae

Letter to Elizabeth Hughes from Kathryn Kuranda

Letter to Kathryn Kuranda from Elizabeth Hughes

cc: James Wasilak, Rockville Chief of Planning
Sheila Bashiri, Rockville Preservation Planner
James N. Proakis, JNP Capital Management, LLC
Soo Lee-Cho, Esquire, Miller, Miller & Canby, Chartered

EDUCATION

Master of Architectural History, Concentration in Historic Preservation, University of Virginia, Charlottesville, Virginia, 1984

Bachelor of Arts in American Studies, Dickinson College, Carlisle, Pennsylvania, 1977

Facilitation Fundamentals, U.S. Institute for Environmental Conflict Resolution, 2011

Section 106 Advanced Seminar, Advisory Council on Historic Preservation, 2009

Training Course "Professional Development Program in Engineering for Older Buildings, including Heritage Buildings: Materials & Pathologies," Association for Preservation Technology & National Center for Preservation Technology and Training, 2003

Workshop "National Environmental Policy Act," University of Southern Maine, Summer Session Program, 1999

Workshop "Property Transfer Site Assessment Research Methods," Illinois State Museum, Springfield Illinois, 1992

Training Course "Historic Concrete: Investigation and Repair," Association for Preservation Technology, 1989

Training Course "Working With Section 106," Advisory Council on Historic Preservation and The Bureau of Land Management, 1988

London Summer School, The Victorian Society in America, 1980

Training Course "Wood Preservation Technology," Association for Preservation Technology, 1978

Historic Restoration and Preservation Technology Course Work, St. Lawrence College, Ontario, Canada, 1977

PROFESSIONAL ASSOCIATIONS

Member, Association for Preservation Technology; Member, International Council on Monuments and Sites; Member, Vernacular Architectural Forum; Member, Society of Architectural Historians.

PROFESSIONAL EXPERIENCE

Senior Vice President - Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1995 - Present

Vice President -- Architectural & Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, 1991-1995

304

ATTACHMENT C

Assistant Vice President -- Architectural and Historical Services, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland 1990 - 1991

Senior Project Manager, R. Christopher Goodwin & Associates, Inc., Frederick, Maryland, October 1989 - 1990

Architectural Historian, State of Nevada, Department of Conservation, Division of Historic Preservation and Archeology, State Historic Preservation Office, April 1984 – July 1989

Architectural Historian, Colorado Department of Highways, Project Development Branch, Denver, Colorado, October 1983 – March 1984

Architectural Historian, Community and Preservation Planning Consultants, Concord, New Hampshire, August 1981 – June 1982

Preservation Consultant, Stafford Rockingham Regional Council, Exeter, New Hampshire, June 1980 – August 1981

MANUSCRIPTS, PUBLICATIONS, AND PAPERS PRESENTED

1980a *Franklin Falls Historic District Nomination.* Franklin Falls, New Hampshire.

1980b *Cultural Resources of Rochester, New Hampshire.* Contributor, Survey Planning Report.

1981a *Plymouth Depot National Register Nomination.* Plymouth, New Hampshire.

1981b *Merchants Exchange.* Concord, New Hampshire. (HABS).

1981c *Rogers Garage.* Concord, New Hampshire. (HABS).

1982a *Boston Port Road Historic District Planning Report.* Rye, New York, Preservation planning study for National Register Historic District encompassing three estates on Long Island Sound.

1982b *Barret Hill Farm National Register District Nomination.* Wilton, New Hampshire.

1982c James Steam Mill Apartments, Historic Preservation Tax Certification Project, Newburyport, Massachusetts.

1982d Medical Clinic, Historic Preservation Tax Certification Project, Concord, New Hampshire.

1983a *Trinidad Foundry and Machine Company.* Trinidad, Colorado, (HAER).

1983b *Lime Kiln Near Morrison.* Morrison, Colorado (HAER).

1983c *Rooney Ranch.* Jefferson County, Colorado (HABS).

1984 *Midwest Iron & Steel Company.* Denver, Colorado, (HAER).

1985a The Architecture of Las Vegas, Nevada. Presentation sponsored by Nevada Humanities Committee and Nevada State Museum and Historic Society, Las Vegas, Nevada.

1985b *Stewart Indian School Historic District Nomination.* Carson City, Nevada.

305

ATTACHMENT C

- 1987a *Multiple Resource Nomination of Buildings Designed by Frederick De Longchamps.* Washoe and Douglas Counties, Nevada.
- 1987b Speaker, "Oasis" Conference sponsored by Nevada Historical Society, Nevada
- 1988a Humanities Committee, Nevada State Council on the Arts, Nevada Division of Historic
- 1988b *Images of the Nineteenth-Century Agricultural Landscape, Nevada Historical Society Quarterly* Vol. XXXI, Winter 1988, No. 4.
- 1989a *Western Vernacular Architecture.* Museum Week lecture series, sponsored by Nevada State Museum and Historical Society, Carson City, Nevada.
- 1989b Preservation Workshop. Nevada State Museum and Historical Society, Las Vegas, Nevada.
- 1989c Walking Tour of Virginia City, Nevada. Sponsored by Historic Preservation Committee, Virginia City, Nevada.
- 1989d *Harmon School National Register Nomination.* Churchill County, Nevada.
- 1989e *Reed House National Register Nomination.* Gardnerville, Nevada.
- 1989f *Architectural Survey of the Planned Royersford Main Post Office, Montgomery County, Pennsylvania* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to the United States Postal Service, Facilities Service Center.
- 1989g *Elm Street School.* Frederick, Maryland (HABS).
- 1990a *Detailed Archeological and Architectural Investigations of the Tabard Village Project Area, Cedar Grove Complex (AA-881), and Archeological Site 18AN594, Anne Arundel County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to Classic Community Corporation.
- 1990b *Phase I and II Archeological Investigations of Bachelor's Hope Farm, St. Mary's County, Maryland* (with Martha Williams and Suzanne Sanders). Submitted to Archetype.
- 1990c *Phases I and II Archeological Investigations of the Frederick Municipal Golf Course, Frederick County, Maryland* (with Thomas W. Neumann and Michelle T. Moran). Submitted to City of Frederick, Maryland.
- 1990d *Archeological and Architectural Reconnaissance of the Suitland Federal Center, Prince Georges County, Maryland* (with Christopher R. Polglase, April Fehr, Michelle Therese Moran, and Janet S. Shoemaker). Submitted to Ward/Hall Associates, AIA.
- 1990e *Phase I Archeological Investigation at the Meadows, Baltimore County, Maryland*, (with R. Christopher Goodwin and Suzanne L. Sanders). Submitted to The Macks Group.
- 1990f *Phase I Archeological Investigations of Billingsley Road, U.S. Route 301 to the Charles County Sanitary Landfill No. 2, Waldorf, Maryland*, (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Whitman, Requardt and Associates.

306

ATTACHMENT C

- 1990g *A Study of Secondary Impacts to Historic Resources Resulting from Construction of the Proposed Montgomery County Resource Recovery Facility, Dickerson, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to ENSR Consulting and Engineering.
- 1990h *Architectural Survey of the Planned Oakmont Green Development, Carroll County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Mary Kendall Shipe). Submitted to Oakmont Green Limited Partnership.
- 1991a *Phase I Archeological Survey and Architectural Investigation of the Proposed 7-Mile BG&E Dublin Extension Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Michelle Moran, Mary K. Shipe, and Martha R. Williams). Submitted to Biohabitats.
- 1991b *Phase I Archeological Survey and Architectural Investigation of the Proposed 24-Mile BG&E Pipeline, Harford County, Maryland* (with R. Christopher Goodwin, Martha R. Williams, Mary K. Shipe, and Peter Morrison). Submitted to Biohabitats.
- 1991c *Architectural Investigations of the Routzahn Home Farm, Frederick County, Maryland* (with R. Christopher Goodwin, Deborah Cannan, and Michelle T. Moran). Submitted to Allegheny Power System.
- 1991d *Historical and Architectural Investigations of the Humphrey Wolfe Farm Howard County, Maryland* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Cattail Creek Country Club.
- 1991e *Architectural History Investigations of the Washington National Airport Surveillance Radar Facility, Washington, D.C.* (with R. Christopher Goodwin and Michelle T. Moran). Submitted to Information Systems and Network Corporation.
- 1991f *Architectural Recordation for Three Buildings Maryland Library for the Blind and Physically Handicapped, Baltimore, Maryland.* Submitted to Ayers Saint Gross.
- 1991g *Phase I Archeological Investigations and Architectural Reconnaissance Survey of the BG&E Utility Corridor from Herald Harbor Road to Maryland Route 3, Anne Arundel County, Maryland* (with R. Christopher Goodwin, Christopher R. Polglase, William R. Henry, and Michelle T. Moran). Submitted to Baltimore Gas & Electric Company.
- 1991h *Suitland Federal Center Historic Preservation Compliance Section 110 and 106 Compliance Prince Georges County, Maryland* (with R. Christopher Goodwin, Michelle T. Moran, and Deborah Cannan). Submitted to Ward/Hall Associates AIA.
- 1991i *Combined Phase I and Phase II Archeological Investigations of Centre 9500, Howard County, Maryland* (with R. Christopher Goodwin, Suzanne L. Sanders, and Michelle T. Moran). Submitted to Land Design Engineering, Inc.
- 1991j *Archeological and Architectural Investigations at Camden Yards, Baltimore, Maryland* (with R. Christopher Goodwin, Elizabeth Pena, and Suzanne M. Sanders). Submitted to the Maryland Stadium Authority.
- 1991k *HABS Recordation of Six Buildings Located within the Uptown National Register Historic District, New Orleans, Louisiana* (with Susan Barrett-Smith). Prepared for the United States Postal Service.

307

ATTACHMENT C

- 19911 *Mitigative Measures for Cultural Resources, Wyoming Valley Levee Raising Project* (with Christopher R. Polglase). Submitted to the U.S. Army Corps of Engineers, Baltimore District).
- 1991m *Cultural Resource Reconnaissance and Sensitivity Study for the C & D Canal Feasibility Study, Chesapeake Bay and Delaware River* (with R. Christopher Goodwin, Christopher R. Polglase, Katherine Grandine, Michelle T. Moran, Peter H. Morrison, and Thomas W. Neumann). Submitted to Maryland Port Administration.
- 1992a *Phase I and Phase II Archeological and Architectural Investigations for the Proposed Site of the William H. Natcher Building, National Institutes of Health, Bethesda, Maryland* (with R. Christopher Goodwin and Suzanne L. Sanders). Prepared for AEPA Architects Engineers.
- 1992b *Architectural and Archeological Investigations In and Adjacent to the Bywater Historic District, New Orleans* (with Stephen Hinks, Jack Irion, Ralph Draughon, William P. Athens, and Paul Heinrich). Submitted to the U.S. Army Corps of Engineers, New Orleans.
- 1992c *Historic Military Quarters Handbook* (with R. Christopher Goodwin and Deborah K. Cannan). Submitted to Baltimore District, U.S. Army Corps of Engineers on behalf of Department of Defense Legacy Resource Management Program.
- 1992d *Cultural Resource Investigation of Brown's Battery Breaking Site, Berks County, Pennsylvania* (with John J. Mintz, Leo Hirrel, Hugh B. McAloon, Christopher Polglase, and Thomas W. Davis). Prepared under contract to U.S. Army Corps of Engineers.
- 1992e *Cultural Resources Investigations of Four Formerly Used Defense Sites, Mississippi* (with Stephen Hinks and Ralph Draughon). Submitted to the U.S. Army Corps of Engineers, Vicksburg.
- 1992f Case Study: Historic Evaluation of Cantonment Areas (with Deborah Cannan). Presentation for DoD Historical and Archeological Resources Workshop, F.E. Warren AFB, WY.
- 1992g *HAER Recordation of Buildings 28 and 28A, Norfolk Naval Shipyard, Portsmouth, VA* (with Hugh McAloon). Submitted to the Norfolk Naval Shipyard.
- 1992h *Visual Impact Study of the Proposed Millpoint Tower* (with Hugh McAloon and Katherine Grandine). Submitted to TEA Corporation.
- 1992i *Cultural Resource Investigations of Camp Shelby, Mississippi* (with Leo Hirrel). Submitted to Vicksburg District, U.S. Army Corps of Engineers.
- 1993a HAER Level 1 Documentation of the Canal Street Transit Station, New Orleans, Louisiana.
- 1993b *Cultural Resources Management Plan and Maintenance, Rehabilitation, and Repair Guidelines for Aberdeen Proving Ground, Maryland* (with Christopher Polglase, Katherine Grandine, and Thomas Davis). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1993c The National Historic Context for Department of Defense Installations. Paper presented at the Conference of the National Council on Public History, Valley Forge, Pennsylvania.

- 308 ATTACHMENT C
- 1993d The Rehabilitation of Mount Aventine Case Study presented to the Charles County Historical Trust.
- 1993e *Historical and Architectural Documentation of the Mississippi Basin Model, Clinton, Mississippi* (with Martha Williams and Bethany Usher). Report submitted to the Vicksburg District, U.S. Army Corps of Engineers.
- 1993f *Architectural Investigations Undertaken in Conjunction with the Base Realignment of Dahlgren Division, Naval Surface Warfare Center, Dahlgren, Virginia* (with Brooke V. Best and Leo Hirrel). Submitted to the Naval Facilities Engineering Command.
- 1993g *Historical Resource Study - Oxon Cove Park* (with Michelle T. Moran, Hugh McAloon and Peter Morrison). Report submitted to National Capital Park/East, National Park Service.
- 1993h *Fort George G. Meade - Cultural Resource Management Plan* (with Hugh McAloon, John Mintz, Martha Williams, Kathleen Child, and Leo Hirrel). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993i *Conditions Analyses and Preservation Treatment Recommendations for Historic Brick Buildings at Aberdeen Proving Ground* (with Brooke V. Best). Report submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1993j *Phase I Archeological Survey and Architectural Investigations of the Proposed Delmarva Power & Light Company, Easton-Steele 138 kV Transmission Line, Maryland* (with Michael A. Simons, Geoffrey E. Melhuish, W. Thomas Dod, and Christopher R. Polglase). Submitted to Delmarva Power & Light Company.
- 1993k *An Architectural History of St. Vincent De Paul Church, 120 North Front Street, Baltimore, Maryland* (with Michelle T. Moran and Martha R. Williams). Submitted to the St. Vincent de Paul Church.
- 1994a *Architectural and Historic Investigations for Four Former Defense Sites in Mississippi* (with Hugh B. McAloon and Leo Hirrel). Submitted to the U.S. Army Corps of Engineers, Vicksburg District.
- 1994b *Architectural Investigations Undertaken in the Dahlgren Residential Area, Naval Surface Warfare Center Dahlgren, Virginia* (with Brooke V. Best, Eliza Edwards, Leo P. Hirrel, and Patrick Jennings). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994c *Architectural Assessment of Buildings 296 and 297 Naval Hospital Cherry Point, North Carolina*. Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994d *Architectural Survey and Assessment of the DuPont Factory Structures at the Fleet and Industrial Supply Center, Cheatham Annex, York County, Virginia* (with Katherine Grandine and Hugh McAloon). Submitted to the Naval Facilities Engineering Command, Atlantic Division.
- 1994e *Inventory of Standing Structures within the Operations and Industries Area at the Dahlgren Laboratory of the Dahlgren Division, Naval Surface Warfare Center* (with Brooke V. Best and Leo P. Hirrel). Submitted to the Naval Facilities Engineering Command, Atlantic Division).
- 1994f *National Historic Context for Department of Defense Installations, 1790 - 1940* (with Deborah K. Cannan, Leo Hirrel, Katherine E. Grandine, Bethany M. Usher, Hugh B. McAloon, and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.

309

ATTACHMENT C

- 1994g *Phase I Cultural Resource Investigations Undertaken at the U.S. Army Reserve Area Maintenance Support Activity (AMSA) Clarksburg, WV* (with Eliza H. Edwards, Suzanne L. Sanders, Leo P. Hirrel, and Hugh McAloon). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994h *Historic Context for Department of Defense Facilities World War II Permanent Construction* (Principal Investigator; by Deborah K. Cannan, Leo P. Hirrel, William T. Dod, and J. Hampton Tucker). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1994i *Navy Cold War Guided Missiles Context: Resources Associated with the Navy's Guided Missile Program, 1946 - 1989* (with Brooke V. Best, Eliza Edwards, and Leo Hirrel). Submitted to the Department of the Navy, Atlantic Division, Naval Facilities Engineering Command.
- 1994j *Historic Context for the Army Material Command's World War II Facilities* (with Deborah K. Cannan, Leo Hirrel, Hugh McAloon, and Brooke V. Best). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1995a *Supplemental Cultural Resource Investigations to the Cultural Resource Management Plan, Aberdeen Proving Ground: Cultural Resource Procedures and Guidelines* (with Geoffrey Melhuish and Katherine Grandine). Submitted to the Atlantic Division, Naval Facilities Engineering Command.
- 1995b *Carlisle Indian Industrial School*. Brochure prepared with William P. Giglio and William McNamee. Submitted to the U.S. Army Research Laboratory and Carlisle Barracks.
- 1995c *St. Vincent de Paul and Baltimore: The Story of a People and Their Home* (with Thomas W. Spalding). Maryland Historical Society, Baltimore, 1995.
- 1995d *Monograph on Black Walnut Rural Historic District* (with Brooke V. Best and Hugh McAloon). Submitted to Old Dominion Electric Cooperative.
- 1995e *Architectural Investigations of the Dudderar Farm, Frederick County, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and Hugh B. McAloon). Submitted to the Ward Corporation.
- 1995f *HAEER Documentation of the Kelly-Springfield Tire Plant, Cumberland, Maryland* (Principal Investigator). Prepared for the Allegany County Commissioners, Cumberland, Maryland.
- 1996a *Historical and Architectural Documentation of the Elmer Wolfe High School* (with Deborah Whelan). Submitted to Carroll County Public Schools, Westminster, Maryland.
- 1996b *Mason Row Maintenance Plan and National Register Documentation, Naval Weapons Station, Yorktown, Virginia* (with Katherine Grandine, Hugh McAloon, and Brooke V. Best). Submitted to Naval Facilities Engineering Command.
- 1996c *Historic American Building Survey Documentation: 5900-5910 Dalecarlia Place, Washington Aqueduct* (Principal Investigator; by Lori B. O'Donnell). Prepared for U.S. Army Corps of Engineers, Baltimore District.
- 1996d *Cultural Resource Investigations at Bayou Rapides Drainage Structure and Pumping Plant, Alexandria, Louisiana* (Principal Investigator; by Hugh McAloon). Submitted to U.S. Army Corps of Engineers, Vicksburg District.

310

ATTACHMENT C

- 1996e *HAER Recordation of Naval Surface Warfare Center Carderock Buildings 7, 11, 12, 13, 138, 139, 157* (Principal Investigator; by Geoffrey Melhuish). Submitted to Engineering Field Activity-Chesapeake, Washington D.C.
- 1996f *Architectural Investigations for the Wedgewood Industrial Park*. Submitted to Parker, Cade & Large, Inc., Millersville, Maryland.
- 1996g *Langley Air Force Base Cultural Resource Management Plan* (Principal Investigator; by Brooke V. Best, Martha Williams, and Lex Campbell). Submitted to the U. S. Army Corps of Engineers, Baltimore District.
- 1996h *Documentation of Bowie Tobacco Barn, Westwood Property, Prince George's County, Maryland* (Principal Investigator). Prepared for Donatelli & Klein, Inc.
- 1997a *Cultural Resources Investigations for Alignment and Environmental Studies, Halfway Boulevard Extended and Newgate Boulevard (PUR-577), Washington County, Maryland* (with April L. Fehr, Martha Williams, W. Patrick Giglio, and Ellen Saint Onge). Prepared for KCI Technologies.
- 1997b *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey E. Melhuish and April L. Fehr). Submitted to Engineering Field Activity - Chesapeake.
- 1997c *Revised National Register Documentation for "Guilford", Frederick County, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for Clagett Enterprises, Inc.
- 1997d *Navy Cold War Communication Context: Resources Associated with the Navy's Communication Program, 1946-1989* (Principal Investigator; by Brooke V. Best, Katherine Grandine, and Stacie Y. Webb). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997e *Intensive Architectural Survey at Naval Base Norfolk, Virginia* (Principal Investigator; by Katherine E. Grandine). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997f *Washington Aqueduct Cultural Resource Management Plan* (Principal Investigator; by Eliza E. Burden and Martha R. Williams). Submitted to the U.S. Army Corps of Engineers, Baltimore District.
- 1997g *Architectural Investigations of St. Juliens Creek Annex* (Principal Investigator; by Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997h *Architectural Scoping Study: The Villages at Urbana, Frederick County, Maryland* (with Geoffrey L. Melhuish). Submitted to Monocacy Land Company, L.L.C.
- 1997i *Architectural and Historic Evaluation, U.S. Naval Air Station Keflavik, Keflavik, Iceland* (Principal Investigator; by Brooke V. Best, Geoffrey E. Melhuish, and Thomas W. Davis). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1997j *Dalecarlia Water Treatment Plant Historic American Engineering Record Documentation and Dalecarlia Employee Dwellings Historic American Building Survey Documentation* (with Lori O. Thursby). Prepared for Baltimore District, U.S. Army Corps of Engineers.

311

ATTACHMENT C

- 1997k *Architectural Impact Assessment for the Bethesda Trolley Trail, Bridges Over I-495 and I-270* (with Lex F. Campbell). Prepared for Hurst-Rosche Engineers, Inc.
- 1997l *Supplemental Phase I Archeological Investigations for the Proposed Storm Water Retention Pond, Naval Surface Warfare Center Carderock, Montgomery County, Maryland* (Principal Investigator; by April L. Fehr and Andrew D. Madsen). Prepared for Engineering Field Activity -Chesapeake, Washington, D.C.
- 1997m *Addendum Report to Phase I Archeological and Architectural Investigations for the Monrovia Wastewater Treatment Plant, Frederick County, Maryland* (with Geoffrey E. Melhuish and April L. Fehr). Prepared for Frederick County Department of Public Works.
- 1997n *Center of Military History, U.S. Army Ordnance Museum, Outdoor Ordnance Collection at Aberdeen Proving Ground, National Register Nomination* (Principal Investigator; by Katherine Grandine and Jane Armstrong). Prepared for Aberdeen Proving Ground and Baltimore District, U.S. Army Corps of Engineers.
- 1997o *HABS Recordation of Stephen J. Barbre Middle School, Kenner, Louisiana*. Submitted to Southeast Regional Office, National Park Service.
- 1997p *Architectural Survey and Impact Assessment for the Proposed Royal Oaks Subdivision, New Market, Maryland* (Principal Investigator; by Lex F. Campbell). Prepared for NML Corporation.
- 1997q *Architectural Evaluations of Properties I and IV for the Washington Gas Company Pipeline, Prince George's and Charles Counties, Maryland* (Principal Investigator; by Lori O. Thursby). Prepared for Stone & Webster Environmental Technology & Services.
- 1997r *Architectural Documentation of the Guilford Tenant House, Frederick, Maryland* (Principal Investigator; by Lex Campbell). Prepared for Clagett Enterprises, Inc.
- 1997s *Object Inventory, Edgewood Area, Aberdeen Proving Ground Summary Report* (with Katherine Grandine and Jane Armstrong). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1997t *Architectural Investigation of St. Timothy's School, Baltimore County, Maryland* (with Lex Campbell and Jane Armstrong). Prepared for St. Timothy's School, Stevenson, Maryland.
- 1997u *Historic American Buildings Survey Documentation: Abbey Mausoleum and Washington Navy Yard Buildings 28, 142, 143, 198, 201, 104, and 197* (Principal Investigator; by Katherine Grandine and Geoffrey Melhuish). Prepared for Engineering Field Activity - Chesapeake.
- 1997v *Architectural Investigations of the Pettingall/Bussard Farm, Frederick County, Maryland* (Principal Investigator; by W. Patrick Giglio and Jane Armstrong). Prepared for Maryland National Golf Club.
- 1997w *Architectural Resources Survey of 3,700 Acres, Naval Security Group Activity, Northwest, Chesapeake, Virginia* (Principal Investigator; by Brooke V. Best). Submitted to Atlantic Division, Naval Facilities Engineering Command.
- 1997x *Historic Preservation Plan: United States Naval Academy, Annapolis, Maryland* (Co-Principal Investigator; by Lex Campbell, John Seidel, and Martha Williams). Prepared for Engineering Field Activity - Chesapeake.

312

ATTACHMENT C

- 1997y *Preservation Analysis of the Derr House, Frederick, Maryland* (Principal Investigator). Prepared for Natelli Associates, Inc.
- 1998a *Architectural Analysis of Gateway Park Development, Prince George's County, Maryland* (Principal Investigator). Prepared for Federal Realty Investment Trust.
- 1998b *Intensive Level Architectural Survey at Naval Surface Warfare Center, Carderock Division, Annapolis Detachment, Annapolis, Maryland* (Principal Investigator; by Geoffrey Melhuish and Lori O. Thursby). Submitted to the Department of the Navy, Engineering Field Activity-Chesapeake.
- 1998c *Historic American Engineering Record Documentation: Caryville Bridge, Holes and Washington Counties, Florida* (Principal Investigator; by Lex Campbell, Brooke Best, and Michael Godzinski). Prepared for Florida Department of Transportation.
- 1998d *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Elaine Kiernan and Lex Campbell). Prepared for Engineering Field Activity - Chesapeake, Washington Navy Yard.
- 1998e *Mason Row National Register Nomination, Naval Weapons Station Yorktown, Yorktown, Virginia* (Principal Investigator; by Katherine Grandine). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998f *Architectural Investigations at Naval Station Roosevelt Roads, Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998g *MHT Documentation for the Gay Street Historic District* (Principal Investigator; by Elaine Kiernan). Prepared for Maryland Department of General Services.
- 1998h *Aberdeen Proving Ground Cold War Era Historic Context* (Principal Investigator; by Katherine Grandine). Prepared for Baltimore District, U.S. Army Corps of Engineers.
- 1998i *Architectural Investigations at Marine Corps Air Station Cherry Point, North Carolina* (Principal Investigator; by W. Patrick Giglio, Brooke Best, Lex Campbell, and Hugh McAloon). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998j *Historical and Architectural Resources Protection Plan (HARP), Naval Surface Warfare Center, Carderock Division, Maryland* (Principal Investigator; by Geoffrey Melhuish and April Fehr). Prepared for Engineering Field Activity - Chesapeake.
- 1998k *Architectural Survey and Assessment of Naval Amphibious Base, Little Creek, Virginia Beach, Virginia* (Principal Investigator; by Lex F. Campbell and Lori B. O'Donnell). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1998l *Historical Assessment of the Laurel Machine Shop, Laurel, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Chester Engineers.
- 1998m *Architectural Inventory of Norfolk Naval Shipyard and Satellite Activities, Norfolk, Virginia* (with Hugh B. McAloon, Geoffrey E. Melhuish, William T. Dod, and Martha R. Williams). Submitted to the Naval Facilities Engineering Command, Atlantic Division.

313

ATTACHMENT C

- 1998n *Wyoming Valley Levee Raising Project: Intensive Architectural Survey in the Susquehanna River Valley* (Principal Investigator; with Katherine Grandine, Elaine Kiernan, and Jane Armstrong). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998o *Architectural Investigations of the Proposed Villages of Urbana Planned Urban Development (PUD) Frederick County, Maryland* (Principal Investigator; by Geoffrey Melhuish). Prepared for Monocacy Land Co., L.L.C.
- 1998p *Phase III Jackson Historic Resources Survey* (Principal Investigator; by Lex Campbell and Sheila Lewis). Prepared for City of Jackson, MS.
- 1998q *Chemical Area Storage Yard (CASY), Aberdeen Proving Ground, Edgewood Area, MHT Historic Properties Inventory Form* (Principal Investigator; with Katherine Grandine). Prepared for Dynamac Corporation.
- 1998r *Maryland Historical Trust State Historic Sites Inventory Form for Building Numbers 115, 123, 132, 144, and 153, Naval Surface Warfare Center, Carderock Division* (Principal Investigator; by Lex Campbell). Prepared for Naval Surface Warfare Center, Carderock Division.
- 1998s *Supplemental Architectural Investigations, Determination of Eligibility Documentation for Select Buildings, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; by Lex Campbell, W. Patrick Giglio, and Elaine Kiernan). Prepared for Engineering Field Activity – Chesapeake.
- 1998t *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR), Chesterfield County, Virginia* (Co-Principal Investigator with Ann Markell; Brooke Best, Bradley McDonald, Ann Markell, Henry Measells, and Brian Clevon). Prepared for Mill Creek Environmental Consultants, Ltd.
- 1998u *Phase I Architectural Survey and Archeological Investigations at Naval Communication Detachment Cheltenham, Prince George's County, Maryland* (Principal Investigator with Christopher R. Polglase; April Fehr and Katherine Grandine). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 1998v *Integrated Cultural Resources Management Plan, US Army Garrison, Fort Belvoir, Virginia* (Co-Principal Investigator with Christopher R. Polglase; Brooke Best, W. Patrick Giglio, and Martha Williams). Submitted to Dewberry & Davis on behalf of the Environmental & Natural Resources Division, Fort Belvoir, Virginia.
- 1999a *Architectural Survey and Assessment of Naval Air Station Oceana and Naval Auxiliary Landing Field Fentress, Virginia* (Principal Investigator; by Geoffrey E. Melhuish). Prepared for Atlantic Division, Naval Facilities Engineering Command.
- 1999b *Archival and Architectural Investigations at Naval Station Roosevelt Roads, Puerto Rico* (Principal Investigator; by Brooke V. Best, W. Patrick Giglio, Geoffrey Melhuish, and Julian Granberry). Prepared for Naval Facilities Engineering Command.
- 1999c *Architectural Survey of NSGA Sabana Seca, Sabana Seca, Puerto Rico* (Principal Investigator; by Brooke V. Best). Prepared for Atlantic Division, Naval Facilities Engineering Command.

314

ATTACHMENT C

- 1999d 800 Carroll Parkway, Frederick, Maryland, National Register Nomination (Principal Investigator; by Katherine Grandine). Prepared for Stuart/Grey Corporation.
- 1999e *Architectural Reconnaissance Survey of the Proposed Beech Tree Development, Prince George's County, Maryland* (Principal Investigator; by Katherine Grandine, Elaine Kiernan, and Brian Clevon). Prepared for Ryko Development, Inc.
- 1999f National Register of Historic Places Registration Form for Florida Avenue Siphon, New Orleans, Louisiana (Principal Investigator; by Brian Clevon and Ralph Draughon). Prepared for U.S. Army Corps of Engineers, New Orleans District.
- 1999g *Indian Head Division, Naval Surface Warfare Center, Historic and Archeological Resource Protection Plan* (Principal Investigator; by Thomas W. Davis). Prepared for Engineering Field Activity-Chesapeake.
- 1999h *Historic American Engineering Record Documentation: Florida Avenue Bridge, New Orleans, Louisiana* (with Brian Clevon and Ralph Draughon). Prepared for the United States Coast Guard Eighth Coast Guard Division.
- 1999i *Archeological Evaluation of Dudderar Farm (18FR729), Urbana, Frederick County, Maryland* (with Sonja Ingram, Hugh McAloon, and Geoffrey Melhuish). Submitted to Monocacy Land Company, LLC.
- 1999j *Architectural Inventory of New Jersey Army National Guard Facilities* (Principal Investigator; by Elaine K. Kiernan). Prepared for Southwest Missouri State University.
- 1999k *Interim Report on Architectural Reconnaissance Survey of the Proposed Independence Pipeline Corridor through Lawrence, Butler, Armstrong, Clarion, Jefferson, Forest, and Elk Counties, Pennsylvania* (Principal Investigator; by Elaine Kiernan, Patrick Giglio, Brooke Best, and Martha Williams). Submitted to ANR Pipeline Company.
- 1999l *Architectural Evaluation of the Farmstead on Rosenstock North Farm* (Principal Investigator; by Katherine Grandine). Submitted to Buckeye Development Construction Company, Inc.
- 1999m Visual Impact Assessment for Hunters Brooke Subdivision. Submitted to Universal Development Company, LLC.
- 1999n National Register Evaluation of the Claiborne Storehouse (Principal Investigator; by Katherine Grandine and Ralph Draughon). Submitted to New Orleans District, U.S. Army Corps of Engineers.
- 1999o *Architectural Documentation of the Sebastian Derr House, Frederick, Maryland* (Principal Investigator; with Katherine Grandine, W. Patrick Giglio, Brian Clevon, and Barry Warthen). Submitted to Natelli Communities.
- 1999p *Letter Report for MD 18: U.S. 301 to Greenspring Road, Queen Anne's County, Maryland* (Principal Investigator; with Katherine E. Grandine, W. Patrick Giglio, and Justin Edgington). Submitted to Maryland Department of Transportation.
- 1999q *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; with W. Patrick Giglio). Submitted to U.S. Army Corps of Engineers, Baltimore District.

315

ATTACHMENT C

- 1999r *Architectural and Historical Assessment of 9150 Darnestown Road, Rockville, Maryland* (Principal Investigator; with Brian Cleven and Katherine Grandine). Prepared for Dr. Bor-Chung Lee through Miller, Miller, & Canby, Rockville, Maryland.
- 1999s *Preliminary Cultural Resources Management Plan for Defense Supply Center Richmond (DSCR)* (Principal Investigator with Ann Markel; with Brooke Best, Henry Measells, and Brian Cleven). Prepared for Mill Creek environmental Consultants, Ltd., Hampton, Virginia,
- 1999t *Architectural and Historical Evaluation of the Kelly-Brewser House, 1853 Reisterstown Road, Pikesville, Maryland.* Prepared for Southwood Holding Corporation, Baltimore, Maryland.
- 1999u *National Register Documentation for Indian Head White Plains Railroad, Indian Head Naval Surface Warfare Center, Charles County, Maryland* (Principal Investigator; with Elaine K. Kiernan and Lex Campbell). Submitted to Department of the Navy, EFA Chesapeake.
- 2000a *Letter Report for Frederick House (BA-1206)* (Principal Investigator; with Katherine Grandine). Submitted to Mr. Arthur S. Tracey Personal Representative Eda Ensor Estate.
- 2000b *Rehabilitation Analysis of the Edward Campbell Farmstead, Frederick, Maryland* (Principal Investigator; with W. Patrick Giglio and Brian Cleven). Submitted to Millennium Development Group, L.L.C.
- 2000c *Integrated Cultural Resource Management Plan: Naval Surface Warfare Center, Carderock Division* (Principal Investigator; with April L. Fehr and Brooke V. Best). Submitted to Naval Surface Warfare Center.
- 2000d *Historic American Engineering Record Documentation: Galvez Street Wharf, New Orleans, Louisiana* (Principal Investigator; by Brian Cleven). Submitted to United States Coast Guard.
- 2000e *Integrated Cultural Resource Management Plan, United States Naval Academy, Annapolis, Maryland* (Principal Investigator; by Lex Campbell, John L. Seidel, and Martha R. Williams). Prepared for Engineering Field Activity – Chesapeake.
- 2000f *Campbell Farmstead (F-8-23) Addendum to Maryland Inventory of Historic Properties Form* (Principal Investigator; by Katherine E. Grandine and Brian Cleven). Prepared for Riverside Investment Group, LLC.
- 2000g *Architectural Recordation of Frederick Memorial Hospital and Nurses' Home, Frederick Maryland* (Principal Investigator; by Justin Edgington and Katherine E. Grandine). Prepared for Frederick Memorial Hospital.
- 2000h *Evaluation of National Register Eligibility of Bayou Boeuf, Bayou Sorrel, and Berwick Locks and the Calumet and Charenton Floodgates in the Atchafalaya Basin, Louisiana* (Principal Investigator; by Brian Cleven and Brooke V. Best). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000i *Historic American Engineering Record Documentation: Rock Creek Trestle, Montgomery County, Maryland* (Principal Investigator; by Brian Cleven). Prepared on behalf of Hurst-Rosche Engineers, Inc. for Montgomery County Department of Public Works and Transportation.

316

ATTACHMENT C

- 2000j *Historic American Engineering Record Documentation: Keystone Lock and Dam, St. Martinville, Louisiana* (Principal Investigator; by Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000k *National Register Assessment of the Lock Keepers Dwelling at the Keystone Lock and Dam, St. Martin Parish, Louisiana* (with Brian Cleven). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2000l *Architectural Inventory of the Gordon Building, 57 South Market Street, Frederick, Maryland* (Principal Investigator; by Brian Cleven and Nathaniel Patch). Prepared for the City of Frederick, Maryland.
- 2000m *Village on Falling Spring Transportation Enhancement Project, Borough of Chambersburg, Franklin County, Pennsylvania*. Prepared for Gannett Fleming, Inc.
- 2000n *Maryland Inventory of Historic Property Form: Birkhead House, 23629 Woodfield Road, Montgomery County* (Principal Investigator; with Katherine Grandine). Prepared for Iko Development, Inc.
- 2000o Speaker. *Tools for Preservation Planners*. Preservation and Revitalization Conference, Preservation Maryland.
- 2000p *Analysis of Regulations for Compliance with Section 106 of the National Historic Preservation Act of 1966, as Amended* (with April Fehr). Submitted to The INGAA Foundation, Inc.
- 2000q *Historical and Architectural Investigation of Memorial Stadium, Baltimore, Maryland* (with Brian Cleven). Prepared for Maryland Stadium Authority, Baltimore, Maryland.
- 2000r *Documentation of Federated Charities Building, 22 South Market Street, Frederick, Maryland* (Principal Investigator with Brian Cleven, Katherine Grandine, Justine Edgington, and Barry Warthen). Prepared for Federated Charities Corporation of Frederick.
- 2000s Sheffer House, Middletown, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000t Francis Scott Key Hotel, Frederick, Maryland. Federal Historic Rehabilitation Tax Certification prepared for Struever Bros., Eccles & Rouse, Inc.
- 2000u Thomas Cannery, Montgomery County, Maryland. Federal and State Historic Rehabilitation Tax Certification prepared for Rockville Fuel and Feed.
- 2000v *National Register Nomination for the Sheffer House* (Principal Investigator; with Katherine Grandine). Prepared for Mr. & Mrs. Goodloe E. Byron.
- 2000w *Study of Building Ornamentation at Langley Air Force Base, Langley, Virginia* (Principal Investigator; with Katherine Grandine and Justine Edgington). Submitted to the Baltimore District, U.S. Army Corps of Engineers.
- 2000x *Marketing Prospectus for the Edward Campbell Farm, Frederick, Maryland*. Prepared for Millennium Development Corporation.

- 317 ATTACHMENT C
- 2000y *MD 26: Liberty Reservoir to MD 32, Carroll County, Maryland, Project No. CL850B11* (Principal Investigator; with Katherine Grandine). Prepared for the Maryland State Highway Administration.
- 2001a *Communications Tower Sites in Frederick County Maryland – Murphy Farm and Buffington Farm*. Assessment prepared for Sprint PCS.
- 2001b *Fairview (71A-13) Environmental Setting*. Letter report prepared for the Prince George's County Planning Department.
- 2001c *National Register Assessment of the Broadmoor Neighborhood* (with Katy Coyle). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001d Speaker. *Symposium on the Management of Capehart-Wherry Era Housing*. Department of the Army.
- 2001e *Energy Panel*. Task Force on Energy, Advisory Council on Historic Preservation Meeting, San Francisco, California.
- 2001f *Aberdeen Proving Ground Integrated Cultural Resources Management Plan*. (Principal Investigator with Christopher R. Polglase; with Katherine Grandine and Thomas W. Davis) Submitted to Advanced Technology Systems, Inc.
- 2001g *Historic American Engineering Record Documentation: St. Claude Bridge, New Orleans, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001h *Historic American Engineering Record Documentation: Inner Harbor Navigation Canal Lock, New Orleans, Louisiana* (Principal Investigator; with Brian Clevon). Prepared for the New Orleans District, U.S. Army Corps of Engineers.
- 2001i *Supplemental Architectural and Historical Investigations for the Proposed Duke Energy Facility on the Vernon-Hines and Urciolo Properties, Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001j *Jesup Blair House and Park, Montgomery County, Maryland, Maryland Inventory of Historic Properties Form* (Principal Investigator; with Kirsten Peeler). Prepared for Montgomery College.
- 2001k *Phase I Archeological Survey for the Proposed Duke Energy North America (DENA), LLC Powerplant, German Township, Fayette County, Pennsylvania (Pennsylvania Environmental Report #2001-1219-051-C)* (with Jesse Kulp, Peter Holmes, Brian Clevon, Katherine Grandine, Michael Hornum, and Scott Meacham). Prepared for CH2M Hill.
- 2001l *Archeological and Historical Investigations for the Proposed Duke Energy Facility on the Offutt Property, Frederick, Maryland* (Principal Investigator; by Katherine Grandine, Brian Clevon, Scott Meacham, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2001m *Architectural Investigation of Buildings and Structures at the Naval Surface Warfare Center Carderock Division Memphis Detachment, Memphis, Tennessee* (Principal Investigator; by Scott Meacham and Katherine Grandine). Prepared for Public Works Department.

318

ATTACHMENT C

- 2001n *Historic Context for Army Fixed-Wing Airfields 1903-1989* (Principal Investigator; by Katherine Grandine, Brian Cleven, Thomas W. Davis, and Nathaniel Patch). Prepared for U.S. Army Environmental Center.
- 2002a *Historic Properties Report on Hangars 745, 755, and 756, Langley Air Force Base, City of Hampton, Virginia VDHR File No. _____* (Principal Investigator; by Katherine Grandine and Brian Cleven). Prepared for Science Applications International Corporation (SAIC).
- 2002b *Evaluation of the National Register Eligibility of Calcasieu Lock, Calcasieu Parish, Louisiana* (Principal Investigator; with Brian Cleven). Prepared for U.S. Army Corps of Engineers.
- 2002c *Historic American Buildings Survey Documentation: Fort Monroe, Buildings 65, 66, 67, 68, 69, 70, and 79* (Principal Investigator; by Katherine Grandine). Prepared for DPW Environmental Office.
- 2002d *HABS/HAER Level II Documentation of the Paint and Oil Storehouse (Building No. 216), Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Carrie Albee). Prepared for Naval Air Station Patuxent River.
- 2002e *Maryland Historical Trust Architectural Inventory Documentation Duke Energy North America Facility in Frederick County, Maryland* (Principal Investigator; by Katherine Grandine, Brian Cleven, and Nathaniel Patch). Prepared for Environmental Consulting & Technology, Inc.
- 2002f *Archival, Architectural, and Geophysical Remote Sensing Investigation at the Montevue Property, Frederick County, Maryland* (Principal Investigator with Christopher R. Polglase; by William Lowthert IV, Scott Meacham, Nate Patch, Brian Cleven, Jean B. Pelletier, and Katherine Grandine). Prepared for the Frederick County Department of Public Works.
- 2002g *Middletown Primary School Site Assessment, Middletown, Maryland* (Principal Investigator; by Brian Cleven). Prepared for Frederick County Public Schools.
- 2002h *Research Design for Cultural Resource Assessment of Six State Parks, State Owned Cultural Resource Assessment Program, Department of Natural Resources Pilot Study* (Principal Investigator with Christopher R. Polglase; by Katherine E. Grandine, Jeffrey H. Maymon, and Martha Williams). Prepared for Maryland Historical Trust.
- 2002i *Archeological, Historical, and Architectural Reconnaissance Study of Crab Cay, Exuma Island, The Bahamas* (with Suzanne L. Sanders, R. Christopher Goodwin, and Jennifer A. Brown). Prepared for Islands By Design Ltd.
- 2002j *Baltimore East/South Clifton Park Historic District National Register Nomination* (Principal Investigator; by Katherine E. Grandine, Brian Cleven, Kirsten G. Peeler, Carrie Albee, and Nathaniel S. Patch). Prepared for Center Development Corporation.
- 2002k *Charity Ellen Frazier Farm Assessment, Knoxville, Maryland* (Principal Investigator; by Brian Cleven and Christine Heidenrich). Prepared for Hailey Development LLC.
- 2002l *HABS/HAER Level II Documentation of Boat House No. 2 (Building 214) Naval Air Station Patuxent River, St. Mary's County, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Naval Air Station Patuxent River.

319

ATTACHMENT C

- 2003a *Unaccompanied Personnel Housing (UPH) during the Cold War (1946-1989)* (Principal Investigator; with Brian Clevon, Nathaniel Patch, Katherine Grandine, and Christine Heidenrich). Prepared for the U.S. Army Environmental Center.
- 2003b *Neighborhood Design Guidelines for Army Wherry and Capehart Family Housing* (Principal Investigator; by Kirsten Peeler and Reid Wraase) Prepared for the Department of the Army.
- 2003c *Housing an Army: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962) Historic Context* (Principal Investigator; with Kirsten Peeler, Christine Heidenrich, Carrie Albee, and Katherine Grandine). Prepared for the Department of the Army.
- 2003d *Comus Inn National Register Nomination*. Prepared for the Comus Inn, Comus, Maryland.
- 2003e *Maryland Heritage Preservation & Federal Historic Preservation Certification Applications, Parts 1 & 2*. Prepared for the Comus Inn, Comus, Maryland.
- 2003f *Heritage Preservation Public Interpretation Kiosk* (Principal Investigator; with Reid Wraase and Christine Heidenrich). Prepared for Ikea, Inc.
- 2003g *Section 106 Effects Report, and Alternate Assessment for the Community Clinical and Behavioral Health Center, Baltimore, Maryland* (Principal Investigator; with Dr. R. Christopher Goodwin). Prepared for Kennedy Krieger Institute, Inc.
- 2003h *Historical and Architectural Investigations of Milcon P160, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.
- 2004a *Determination of Eligibility Report Owens Property (Landing Road Cider Mill [MIHP #HO-420]), Howard County, Maryland* (Principal Investigator; by Brian Clevon, and Kathryn G. Smith). Prepared for The Keelty Company.
- 2004b *Maryland Heritage Preservation and Federal Historic Preservation Certification Applications, Parts 1, 2, & 3, Francis Scott Key Hotel, Frederick, Maryland*. Prepared for Struever Bros., Eccles & Rouse, Inc.
- 2004c *Draft Programmatic Agreement*. Prepared for Indian Head Division, Naval Surface Warfare Center, Indian Head.
- 2004d *Architectural Survey for the Proposed Crown Landing Project Logan Township, Gloucester County, New Jersey and New Castle County, Delaware* (Principal Investigator; by Brian Clevon and Martha Williams). Prepared for Environmental Resource Management.
- 2004e *Historical and Architectural Investigation of 1950s-era Industrial Areas and Miscellaneous Buildings, Indian Head Division, Naval Surface Warfare Center, Indian Head, Charles County, Maryland* (Principal Investigator; by Brian Clevon). Prepared for Indian Head Division, NSWC.
- 2004f *Determination of Eligibility Report; Feaga-Albaugh Farmstead, Frederick County, Maryland* (Principal Investigator; by Kathryn G. Dixon). Prepared for Horizon Frederick II LLC.
- 2005a *Determination of Eligibility Forms for Griffith's Adventure (Joshua F.C. Worthington House BA-0011)* (Principal Investigator; by Kirsten Peeler). Prepared for Whitney, Bailey, Cox & Magnani.

320

ATTACHMENT C

- 2005b *Determination of Eligibility Reports; Demarr Property (CH812), Quarles Property (CH-814), and Vliet Property (CH-813)* (Principal Investigator; by Kirsten Peeler, Kathryn Dixon, and Christine Heidenrich). Prepared for Whitman, Requardt and Associates, LLP.
- 2005c *Architectural Investigations for the Proposed Sudley Manor Drive Public-Private Transportation Act (PPTA), Prince William County, Virginia* (Principal Investigator; by Katherine Grandine and Martha Williams). Prepared for CH2M Hill.
- 2005d *Focused Literature Search – Naval Air Station Atlantic City* (Principal Investigator; by Dean Doerrfeld and Brian Clevon). Prepared for TRC Environmental Corporation.
- 2005e *Determination of Eligibility Report; Elmwood Farm, Washington County, Maryland MIHP No. WA-I-018* (Principal Investigator; by Kathryn G. Dixon and Kirsten Peeler). Prepared for Elmwood Farm Development, LLC c/o Terra Consultants, Inc.
- 2005f *An Addendum Report to Phase I Archeological Investigation of 15 Acres within the West Campus Shepherd University, Jefferson County, West Virginia* (Principal Investigator; by Dean A. Doerrfeld and Chris Heidenrich). Prepared for Shepherd University Facilities Management.
- 2005g *National Register of Historic Places Nomination for Spring Hill Farm, Loudoun County, Virginia* (Principal Investigator; by Dean Doerrfeld and Chris Heidenrich). Prepared for Larry Ritchie Williams.
- 2005h *National Register of Historic Places Nomination for Whiteford-Cardiff Historic District* (Principal Investigator; by Christine A. Heidenrich and Kirsten Peeler). Prepared for Whiteford, Pylesville, Cardiff Community Association, Inc.
- 2005i *Determination of Eligibility Form for Christian Kemp Farmstead (MIHP F-1-179)* (Principal Investigator; by Christine Heidenrich and Dean Doerrfeld). Prepared for Ausherman Development Corporation.
- 2005j *Gap Analysis, Mitigation for Cold War Era Unaccompanied Personnel Housing, World War II, and Cold War Era Ammunition Bunkers and Army Ammunition Plants* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Medical Research Acquisition Activity.
- 2005k *MIHP Form: PG:71-38, Bridge No. 16017, MD 450 Over CSX Railroad, Bowie, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland Department of Transportation.
- 2005l *Historic Context for Washington State Air National Guard* (with Kirsten Peeler, Dean A. Doerrfeld, and Christine Heidenrich). Prepared for Air National Guard Readiness Center.
- 2005m *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Principal Investigator; by Katherine E. Grandine). Prepared for USAMRAA.
- 2005n *Environmental Assessment for the Disposition of Belle Chance Residence and Outbuildings, Andrews AFB, MD* (Principal Investigator; by Brian Clevon). Prepared for the Department of the Air Force.
- 2005o *World War I Barracks (E4400 Block) and Service Buildings at Edgewood Arsenal, Historical Documentation* (Principal Investigator; by Kathryn G. Dixon). Prepared for Aberdeen Proving Ground through U.S. Army Medical Research Acquisition Activity.

321

ATTACHMENT C

- 2005p *Determination of Eligibility Form for Bishop Field, United States Naval Academy* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for A. Morton Thomas Associates, Inc.
- 2005q *Maryland Determination of Eligibility Report for Lord Golf Project Fox Hall Farm* (Principal Investigator; by Dean A. Doerrfeld and Kathryn Dixon). Prepared for Lionheart Consulting.
- 2005r *Determination of Eligibility for Smith Farm (F-2-111)* (Principal Investigator; by Kirsten G. Peeler and Kathryn G. Dixon). Prepared for Jefferson Valley, LLC c/o Ausherman Development Corporation.
- 2005s *MIHP Form for Edgewood Area Industrial Area, Edgewood Area, Aberdeen Proving Ground, Maryland* (Principal Investigator; by Katherine Grandine). Prepared for Aberdeen Proving Ground.
- 2006a *BRAC/EIS Cultural Resources Support*. Prepared for Weston Solution, Inc.
- 2006b *Summary Report of Archival Research Department of the Navy Unaccompanied Personnel Housing (1946-1989) and Ammunition Storage Facilities (1939-1984)* (Principal Investigator; by Dean A. Doerrfeld).
- 2006c *Determination of Eligibility Form for Good Fellowship, MIHP #HO-190, Howard County, Maryland* (Principal Investigator; by Dean A. Doerrfeld). Prepared for Davis Branch LLC.
- 2006d *Housing an Air Force and a Navy: The Wherry and Capehart Era Solutions to the Postwar Family Housing Shortage (1949-1962)* (Principal Investigator; by Kirsten Peeler, Christine Heidenrich, Katherine E. Grandine, and Dean A. Doerrfeld). Prepared for the United States Departments of the Air Force and Navy.
- 2006e *Maryland Inventory of Historic Properties Form: Feaga-Albaugh Farmstead, Frederick County, Maryland; MIHP No. F-3-226* (Principal Investigator; by Kathryn G. Dixon). Prepared for Cannon Bluff, LLLP.
- 2007a *Maryland Inventory of Historic Properties Form for Broadway Squares (B-5138) Baltimore City, Maryland* (Principal Investigator; by Kirsten Peeler, M.S.). Prepared for Madison Street Properties, Inc.
- 2007b *National Register Assessment of Buildings 7033, 7034, 7036, and 7215, Custer Hill Troop Area, Fort Riley, Kansas* (Principal Investigator; by Brian Clevon). Prepared for Fort Riley Kansas and U.S. Army Environmental Center.
- 2007c *Survey of the Architectural and Archeological Cultural Resources at the Virginia Air National Guard Installations at the Richmond International Airport, Henrico County and the State Military Reservation, Camp Pendleton, City of Virginia Beach, Virginia* (Principal Investigator; with Ann B. Markell, Katherine Grandine, and Nathan Workman). Prepared for ANGRC/CEVP.
- 2007d *Army Ammunition and Explosives Storage During the Cold War (1946-1989)* (Principal Investigator; by Kathryn Dixon, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Christine Heidenrich, and Katherine E. Grandine). Prepared for USAEC.

322

ATTACHMENT C

- 2007e *Maryland Inventory of Historic Properties Addendums for 14 Properties* (Principal Investigator; by Brian Cleven and Kirsten Peeler). Prepared for H.B. Mellott Estate, Inc.
- 2007f *Army Ammunition Production During the Cold War (1946-1989)* (Principal Investigator; by Christine Heidenrich, Dean A. Doerrfeld, Rebecca Gatewood, Kirsten Peeler, Katherine E. Grandine, Heather McMahon, and Benjamin Riggle). Prepared for USAEC.
- 2007g *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Blue Grass Army Depot, Richmond, Kentucky* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007h *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2007i *Determination of Eligibility Forms for: Thomas W. Hall Farm (AA-2382) and Tobacco Farm on Johns Hopkins Road (AA-2383)* (Principal Investigator; by Kirsten Peeler). Prepared for McCrone, Inc.
- 2008a *Cultural Resources Survey, Architecture and Archeology, of Maine Air National Guard Installations at Bangor Air National Guard Base and South Portland Air National Guard Station, Penobscot and Cumberland Counties, Maine* (Principal Investigator with Ellen R. Cowie; with Jeffrey Maymon, Brian Cleven, Kathryn Dixon, Rebecca Gatewood, and Nathan S. Workman). Prepared for Air National Guard Readiness Center.
- 2008b *Cultural Resources Survey for Architecture and Archaeology of the Vermont Air National Guard Installation at Burlington International Airport, Chittendon County, Vermont* (Principal Investigator with Ann B. Markell; by Ann B. Markell, Kirsten Peeler, Christine Heidenrich, Martha Williams, and Nathan Workman). Prepared for Air National Guard Readiness Center.
- 2008c *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: White Sands Missile Range, White Sands, New Mexico* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008d *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Aberdeen Proving Ground, Aberdeen Maryland* (Principal Investigator; by Katherine Grandine). Prepared for U.S. Army Environmental Command.
- 2008e *Army Ammunition and Explosives Storage During World War II and the Cold War Era – Site Report: Louisiana Army Ammunition Plant, Minden Louisiana* (Principal Investigator; by Kirsten Peeler, Dean Doerrfeld, and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008f *Pinnacle Wind Project, Mineral County, West Virginia – Phase I Investigation for Architectural and Structural Resources* (Principal Investigator; by Rebecca J. Gatewood, Katherine Grandine, Chris Heidenrich, and Dean A. Doerrfeld). Prepared for Pinnacle Wind Force, LLC.
- 2008g *Army Ammunition Production During the Cold War Era – Site Report: Radford Army Ammunition Plant, Radford Virginia* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.

323

ATTACHMENT C

- 2008h *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Pine Bluff Arsenal, Pine Bluff, Arkansas* (Principal Investigator; by Katherine Grandine and Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008i *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Anniston Army Depot, Anniston, Alabama* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008j *Army Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Hawthorne Army Depot, Hawthorne, Nevada* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for U.S. Army Environmental Command.
- 2008k *Army Ammunition Production During The Cold War Era - Site Report: Iowa Army Ammunition Plant, Burlington, Iowa* (Principal Investigator; by Dean A. Doerrfeld). Prepared for U.S. Army Environmental Command.
- 2008l *Determination of Eligibility Form for Cricket Creek Farm (HO-480)* (Principal Investigator; by Kirsten Peeler). Prepared for Coscan/Adler Limited Partnership.
- 2008m *Programmatic Environmental Assessment for Site Selection, Veterans Affairs Medical Center (VAMC) and Louisiana State University Academic Medical Center of Louisiana (LSU AMC)* (with Katy Coyle and Lindsay Hannah). Submitted by EarthTech to the Department of Veterans Affairs and the Federal Emergency Management Agency.
- 2009a *Preliminary National Register of Historic Places Evaluation for the Enrico Fermi Atomic Power Plant Monroe County, Lagoona Beach, Michigan* (Principal Investigator; by Dean A. Doerrfeld and Ben Riggle). Prepared for Commonwealth Cultural Resources Group, Inc.
- 2009b *Architectural Investigations for the Monocacy Boulevard Central Section City of Frederick, Maryland* (Principal Investigator; by Kirsten Peeler and Melissa Crosby). Prepared for Fox & Associates, Inc.
- 2009c *Integrated Cultural Resource Management Plan for the Bangor International Airport (ANG) and the South Portland Air National Guard Station, Maine Air National Guard* (with Kathryn G. Dixon, Jeffrey H. Maymon, Troy J. Nowak, Adam Friedman, Nathan S. Workman, and Lindsay Hannah). Prepared for Maine Air National Guard and National Guard Bureau.
- 2009d *Architectural Reconnaissance Survey Blue Creek Wind Farm Project Paulding and Van Wert Counties, Ohio* (Principal Investigator; by Benjamin M. Riggle, Jennifer L. Evans, and Melissa Crosby). Prepared for Heartland Wind, LLC.
- 2009e *Site-Specific Environmental Assessment for Building #2 The Veterans Affairs Medical Center (VAMC), New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller).
- 2010a *Integrated Cultural Resource Management Plan for Forbes Field Army National Guard Base, Kansas Air National Guard* (Principal Investigator; by Kathryn G. Dixon and Benjamin Riggle). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.

324

ATTACHMENT C

- 2010b *Integrated Cultural Resource Management Plan for the Jefferson Proving Ground/Jefferson Range, Indiana Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for Indiana Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010c *Integrated Cultural Resource Management Plan for Otis Air National Guard Base - Massachusetts Air National Guard* (Principal Investigator; by Kathryn Dixon and Nathan Workman). Prepared for Massachusetts Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2010d *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Gateway Converter Station and the Maryland/Delaware State Line in Wicomico County, Maryland* (Principal Investigator; by Roger L. Ciuffo and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2010e *Site-Specific Environmental Assessment for Veterans Affairs Medical Center (VAMC)* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011a *Integrated Cultural Resource Management Plan for the 179th Airlift Wing/Mansfield Lahm Airport - Ohio Air National Guard* (Principal Investigator; by Kathryn Dixon, Jennifer Evans, and Melissa Crosby). Prepared for Ohio Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011b *Integrated Cultural Resource Management Plan for the Selfridge Air National Guard Base - Michigan Air National Guard* (Principal Investigator; by Katherine E. Grandine and Kathryn Dixon). Prepared for Michigan Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011c *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Seal Beach, Seal Beach, California and Detachment Fallbrook, Fallbrook, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011d *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Marine Corps Base, Quantico, Virginia* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011e *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Training Center Great Lakes, Illinois* (Principal Investigator; by Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011f *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Weapons Station Charleston, Charleston, South Carolina* (Principal Investigator; by Katherine Grandine, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011g *Navy Ammunition and Explosives Storage During World War II and the Cold War Era. Site Report: Naval Surface Warfare Center, Crane Division, Indiana* (Principal Investigator; by Melissa Crosby and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.

325

ATTACHMENT C

- 2011h *Navy Ammunition and Explosives Storage During World War II and the Cold War Era - Site Report: Marine Corps Air Station Miramar, San Diego, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011i *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) - Site Report: Naval Air Station North Island California and Naval Amphibious Base Coronado, California* (Principal Investigator; by Rebecca Gatewood and Dean Doerrfeld). Prepared for Naval Facilities Engineering Command.
- 2011j *Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989) Site Report: Naval Installations in the Hampton Roads Area, Virginia (Naval Station Norfolk, Naval Amphibious Base Little Creek, Naval Air Station Oceana and Dam Neck Annex)* (Principal Investigator; by Kathryn G. Dixon, Melissa Crosby, Dean Doerrfeld, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command.
- 2011k *Gladhill Annexation: Maryland Inventory of Historic Properties Form, 8518 East Patrick Street, Frederick, Maryland* (Principal Investigator; by Kathryn Dixon). Prepared for Frederick Land Company.
- 2011l *Integrated Cultural Resource Management Plan for the 114th Fighter Wing / South Dakota Air National Guard at Joe Foss Field* (Principal Investigator; by Kirsten G. Peeler, M.S., B.A. and Kathryn G. Dixon, B.A.). Prepared for the South Dakota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2011m *Architectural Investigations at U.S. Army Garrison, Yuma Proving Ground, Yuma County, Arizona* (Principal Investigator; by Kirsten G. Peeler, Jennifer L. Evans, and Kevin F. May). Prepared for U.S. Army Garrison Yuma.
- 2011n *Preliminary Viewshed Analysis for the Proposed Pepco Holdings, Inc. Mid-Atlantic Power Pathway Project Between the Choptank River and the Gateway Converter Station in Dorchester and Wicomico Counties, Maryland* (Principal Investigator; by Roger L. Ciuffo, Benjamin Riggle, and Kevin F. May). Prepared for Cardno Entrix, Inc.
- 2011o *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Ellsworth Air Force Base, Rapid City, South Dakota* (Principal Investigator; by Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011p *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Wright Patterson Air Force Base, Dayton, Ohio* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011q *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Minot Air Force Base, Minot, North Dakota* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.

326

ATTACHMENT C

- 2011r *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Lackland Air Force Base, San Antonio, Texas* (Principal Investigator; by Rebecca Gatewood and Dean A. Doerrfeld). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011s *Air Force Ammunition and Explosives Storage & Unaccompanied Personnel Housing During the Cold War (1946-1989) - Site Report: Kirtland Air Force Base, Albuquerque, New Mexico* (Principal Investigator; by Dean A. Doerrfeld and Rebecca Gatewood). Prepared for the United States Air Force Center for Engineering and the Environment.
- 2011t *Ammunition and Explosives Storage for the Navy (1939-1989) and the Air Force (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Kathryn G. Dixon, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011u *Air Force and Navy Unaccompanied Personnel Housing During the Cold War Era (1946-1989)* (Principal Investigator; by Dean A. Doerrfeld, Christine Heidenrich, and Rebecca Gatewood). Prepared for Naval Facilities Engineering Command and United States Air Force Center for Engineering and the Environment.
- 2011v *Site-Specific Environmental Assessment for Disposition of Veterans Affairs Medical Center (VAMC), 1601 Perdido Street, New Orleans, Louisiana* (with Katy Coyle, Lindsay Hannah, and Nathanael Heller). Submitted by AECOM to the Department of Veterans Affairs.
- 2011w *Phase I Submerged Cultural Resources Investigation for the Terrebonne Basin Shoreline Restoration Whiskey Island Project Item, Terrebonne Parish, Louisiana* (with Troy J. Nowak, Kathryn Ryberg, Katy Coyle and Susan Barrett Smith). Prepared for MWH Americas, Inc., Louisiana Office of Coastal Protection and Restoration, and the New Orleans District, U.S. Army Corps of Engineers.
- 2011x *Mary Hadley Tenant House, MIHP Form No. AL-VI-B-358* (Principal Investigator; by Kathryn Dixon). Prepared for Maryland State Highway Administration.
- 2011y *Clifton-on-the-Monocacy: Nomination to the Frederick County Register of Historic Places* (Principal Investigator; by Kathryn Dixon). Prepared for Mr. and Mrs. Howard Crum.
- 2011z *Architectural Reconnaissance Survey for the Proposed Desert Wind Energy Project, Pasquotank and Perquimans Counties, North Carolina* (Principal Investigator; by Rebecca J. Gatewood and Martha Williams). Prepared for Iberdrola Renewables.
- 2012a *An Historic Context for NASA's Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler and Travis Shaw). Prepared for Parsons Infrastructure and Technology Group.
- 2012b *Architectural Reconnaissance Survey for the Tuscarawas Gas Processing Plant, Tuscarawas County, Ohio* (Principal Investigator; with Benjamin Riggle, Katherine Grandine, and Jennifer Evans). Prepared for El Paso Midstream, Inc.
- 2012c *Integrated Cultural Resource Management Plan for Kingsley Field Air National Guard Base - Oregon Air National Guard* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Oregon Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.

327

ATTACHMENT C

- 2012d *Integrated Cultural Resource Management Plan for the 148th Fighter Wing / Minnesota Air National Guard at Duluth International Airport* (Principal Investigator; by Kathryn Dixon, Kirsten Peeler, and Melissa Crosby). Prepared for the Minnesota Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012e *Integrated Cultural Resource Management Plan for Shepherd Field Air National Guard Base - West Virginia Air National Guard* (Principal Investigator; by Kathryn Dixon and Roger Ciuffo). Prepared for the West Virginia Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012f *Integrated Cultural Resource Management Plan for the 166th Airlift Wing / Delaware Air National Guard at New Castle Airport* (Principal Investigator; by Kathryn Dixon and Melissa Crosby). Prepared for the Delaware Air National Guard and National Guard Bureau through Air Force Center for Engineering and the Environment.
- 2012g *Campus-Wide Architectural Survey, Goddard Space Flight Center* (Principal Investigator; by Kirsten Peeler) Draft Technical Reports prepared for Parsons Infrastructure & Technology Group, Inc.
- 2012h *Architectural Investigations – NASA Goddard Space Flight Center (PG4-19)* (Principal Investigator; by Kirsten G. Peeler, Travis F. Shaw, Rebecca J. Gatewood, and Kathryn G. Dixon). Prepared for Parsons Infrastructure & Technology Group.
- 2012i *Rucker Park Historic Landscape and Structures Survey, Fort Sill Oklahoma* (Principal Investigator; by Rebecca J. Gatewood). Prepared for PaleoWest Archaeology.
- 2012j *Rucker Park Management Plan, Fort Sill, Oklahoma* (Principal Investigator; by Lindsay S. Hannah). Prepared for PaleoWest Archaeology.
- 2012k *Cultural Resource Survey Stage 1A Report, Newtown Creek, New York* (Principal Investigator; Stephen Schmidt, David McCullough, Kathryn Ryberg, Kathryn Kuranda). Prepared for Anchor QEA.
- 2012l *Woodstock College Maryland Inventory of Historic Properties and Determination of Eligibility Forms (BA-7), Baltimore County, Maryland* (Principal Investigator; by Katherine Grandine and Benjamin Riggle). Prepared for PBDewberry.
- 2012m *History of Air Force Civil Engineering 1907 – 2010*. Draft manuscript prepared for the Air Force Civil Engineering Support Agency (Principal Investigator with Katherine Grandine and Rebecca Gatewood). Prepared for USAMRAA.
- 2013a *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for CH2M HILL.
- 2013b *Curation Needs Assessment for Archeological Collections, Archival Documents, and Buildings 326 and 438, Fort Sill, Oklahoma* (Principal Investigator; with Nathanael Heller and Michael Proffitt, AIA). Prepared for All Consulting, Inc.

328

ATTACHMENT C

- 2013c *199 Baughmans Lane Maryland Inventory of Historic Properties Form, Frederick County, Maryland.* (Principal Investigator with Katherine Grandine) Prepared for the Conley Family Limited Partnership, Frederick, Maryland.
- 2013d *Lewis J. Martz House (F-3-259) and Angleberger Farm (F-3-260) Maryland Inventory of Historic Properties Forms, Frederick County, Maryland* (Principal Investigator; with Katherine Grandine and Jennifer Evans). Prepared for Christopher Crossing, Hogan Companies, Annapolis, Maryland.
- 2013e *Integrated Cultural Resources Management Plan for NASA Goddard Space Flight Center.* (Principal Investigator; by Kirsten G. Peeler). Prepared for Parsons Infrastructure & Technology Group.
- 2013f *Proposed Manor at Holly Hills, 24 MIHP Form Addenda and 5 new MIHP Forms* (Principal Investigator; by Rebecca Gatewood, Jennifer Evans, Travis Shaw, Katherine Grandine, Kathryn Dixon, and Kirsten Peeler). Prepared for the Manor at Holly Hills and Landsdowne Development Group, LLC.
- 2013g *Frederick County Register of Historic Places Nomination Form and Supporting Documentation* (Principal Investigator; by Rebecca Gatewood and Katherine Grandine). Prepared for Church of Scientology.
- 2013h *Maryland Inventory of Historic Properties form for Cadillac Motel (PA:85A-81)* (Principal Investigator; by Kirsten Peeler). Prepared for Angela Patel.
- 2013i *Determination of Eligibility Form for Clinton Street Pier (B-5268)* (Principal Investigator; by Kirsten Peeler). Prepared for KCI Technologies, Inc. for Maryland Port Administration.
- 2013j *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Giles County Project, Summers and Monroe Counties, West Virginia, and Giles County, Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for CH2M Hill Engineers, Inc.
- 2013k *Historic Preservation Analysis: Melford, Prince George's County, Maryland* (Principal Investigator; with Rebecca J. Gatewood). Prepared for St. John Properties, Inc.
- 2014a *Architectural Investigations HPO # 13-0145-Preferred Alignment between Mile Posts 1.9 and 9.0, Gloucester County, New Jersey* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission Co.
- 2014b *West Virginia Historic Property Inventory Form, Files Creek Compressor Station, Randolph County, West Virginia* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Natural Resource Group, LLC.
- 2014c *Fort Belvoir Railroad Bridge, HAER No. VA-141* (Principal Investigator; by Kirsten Peeler). Prepared for A. Morton Thomas & Associates, Inc.
- 2014d *Naval Proving Ground Indian Head, Charles County, Maryland – NPS Project #1750, Historic American Engineering Record (HAER) Report (HAER No. mD-179; MIHP No. CH-371)* (Principal Investigator; by Rebecca Gatewood, Roger Ciuffo, and Benjamin Riggie). Prepared for Eastern Research Group, Inc.

329

ATTACHMENT C

- 2014e *Indian Head Wayside Exhibit Panel* (Principal Investigator; by Rebecca Gatewood and Kristopher West). Prepared for Eastern Research Group, Inc.
- 2014f *Architectural Survey in Support of Columbia Gas Transmission Line 3664 Replacement Project, Wayne Township, Greene County, Pennsylvania* (Principal Investigator with Michael Hornum; by Rebecca Gatewood). Prepared for CESO, Inc.
- 2015a *Historic Assessment National Institute of Standards and Technology Gaithersburg, Maryland*. Prepared for Metropolitan Architects & Planners on behalf of the National Institute of Standards and Technology.
- 2015b *Determination of Eligibility Form for North Gay Street Survey Area B-5283* (Principal Investigator; by Rebecca Gatewood and Jennifer Evans). Prepared for Baltimore Development Corporation.
- 2015c *Preliminary Cultural Resources Investigations – Monrovia Town Center, Frederick County, Maryland* (Principal Investigator; by Kirsten Peeler and Kathleen Child). Prepared for Stanley Business.
- 2015d *Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach Xpress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Rebecca Gatewood). Prepared for Columbia Gas Transmission, LLC.
- 2015e *Addendum to Architectural Reconnaissance Survey for the Proposed Columbia Gas Transmission, LLC Leach Xpress Project, Marshall and Wayne Counties, West Virginia* (Principal Investigator; by Katherine E. Grandine). Prepared for Columbia Gas Transmission, LLC.

R. CHRISTOPHER GOODWIN & ASSOCIATES, INC.

cultural resource management and preservation planning

April 20, 2016

Elizabeth Hughes
Director / State Historic Preservation Officer
Maryland Historical Trust
100 Community Place
Crownsville, Maryland 21032

Dear Ms. Hughes:

Nell Ziehl, Chief, Office of Planning, Education and Outreach, suggested that I contact you for technical assistance related to the application of the Secretary of the Interior's *Standards for Reconstruction*, the contexts appropriate for the approach, the degree of flexibility allowable in interpreting the *Standards*, and the level of documentation necessary to avoid conjecture and a false sense of history.

These issues have been raised in a case involving the former Chestnut Lodge Psychiatric Hospital, a monumental, four-story, brick building that was located in Rockville, Maryland. This building was proposed for rehabilitation for condominiums as part of a Planned Residential Development approved by the City of Rockville in 2006. The building was destroyed by fire in 2009 before substantive physical investigation and architectural documentation were completed. Further, architectural salvage and archeological investigation were not undertaken prior to the building remains being razed within 4 days of the fire. The City's Fire Marshal required immediate demolition/removal after determining that the remaining building structure was unsafe and posed an imminent threat to the safety of emergency service professionals attempting to completely extinguish the fire as well as to the general public residing within the general vicinity.

The property was listed in the National Register of Historic Places in 1975 and is part of the City of Rockville's West Montgomery Avenue Historic District. Narrative descriptions of the building and its historical significance survive, as do select historic photographs of the building, which was constructed in 1889 as the Woodlawn Hotel and repurposed as a hospital in the early twentieth century. Architectural plans are limited to schematic floor plans and building sections developed to illustrate the unit lay out of the condominiums proposed in 2006. Documentation on the building is insufficient to support plans and specifications for reconstruction applying the Secretary's *Standards*.

April 20, 2016

Page 2
331

ATTACHMENT C

The Chestnut Lodge Hospital was a significant and much beloved landmark in the City of Rockville. Its loss continues to be felt by a segment of the community who are advocating for the recreation of the hospital based on the general approximation of the design.

As you know, the City of Rockville is a Certified Local Government and has adopted the Secretary of the Interior's *Standards for the Treatment of Historic Properties* for the review of work within their historic districts. Our client, JNP Chestnut Lodge, LLC, acquired the property after the fire and has coordinated with the city's Historic Preservation Planner, Shelia Bashiri, and with the Historic District Commission (HDC) during two courtesy reviews (June 18, 2015; November 19, 2015) to develop a new building design for the site that is compatible with the district. The HDC has advised against any design that creates a false sense of historicism. A formal application for the HDC's review cannot be made until after the Mayor and Council's approval of an amendment to the 2006 Planned Residential Development which had called for the rehabilitation of the then-vacant hospital as condominiums.

JNP Chestnut Lodge, LLC currently is seeking said amendment. This process involves exhaustive staff review, recommendations from the Planning Commission following a public meeting, and final action by the Mayor and Council following a public meeting. It is anticipated that formal application for HDC review will be filed following resolution of this amendment.

Staff issued their report recommending conditional approval of the construction of a new building on March 2, 2016 and the Planning Commission meeting was held on March 9, 2016. Staff recommended against reconstruction of the Chestnut Lodge Hospital due to the potential for creating a false sense of history. Public testimony and discussion during the Planning Commission meeting suggested that a recreation of the hospital was an appropriate approach and that the Secretary of the Interior's *Standards*, while germane to the case, were open to liberal interpretation regarding the level accuracy in a reconstruction.

While I understand that the MHT cannot comment directly on the case, I am requesting a letter providing technical guidance from your office on the requirements of the *Standards for Reconstruction* and the role of the local HDC in interpreting those *Standards* to clarify the issues involved for the meeting with Mayor and Council. Unfortunately, the Mayor and Council are scheduled to hear the case during on April 25th; I anticipate that the record will remain open for a week after the meeting.

Thank you in advance for your assistance. I look forward to hearing from your office.

Sincerely,



Kathryn M. Kuranda, M.Arch.Hist.
Senior Vice-President

cc: JNP Chestnut Lodge, LLC

KMK/blb





Larry Hogan, Governor

David R. Craig, Secretary

Boyd Rutherford, Lt. Governor

Wendi W. Peters, Deputy Secretary

April 22, 2016

Kathryn M. Kuranda
Senior Vice President
R. Christopher Goodwin and Associates, Inc.
241 East Fourth Street, Suite 100
Frederick, MD 21701

Dear Ms. Kuranda:

I am in receipt of your inquiry regarding application of the Secretary of the Interior's Standards for Reconstruction, the contexts appropriate for this approach, the degree of flexibility allowable in interpreting this Standard, and the level of documentation required. This standard is one of four treatment standards included in the Secretary of the Interior's Standards for the Treatment of Historic Properties. These four standards are promulgated by the National Park Service in order to promote responsible preservation practices and address preservation, rehabilitation, restoration, and reconstruction activities.

In the experience of the Trust, the reconstruction treatment standard is applied to a construction project when the goal is to re-create vanished or non-surviving portions of a property – most typically for interpretive purposes. This treatment standard may only be employed successfully when sufficient documentary and physical evidence exists to permit accurate reconstruction with minimal speculation. If sufficient evidence does not exist to permit for an accurate reconstruction, then other types of interpretive methods should be pursued. Reconstruction is only recommended when this approach is essential to public understanding of a property.

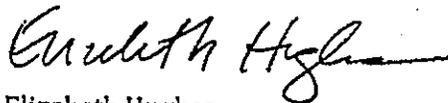
The first step in undertaking a reconstruction is development of a documentation plan. A thorough archeological investigation of the site where reconstruction is proposed is also required in most cases. These efforts are intended to satisfy the strict documentation requirements that serve as the basis for reconstruction projects as described in Standard #4:

4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.

The reconstruction standard provides little flexibility. Reconstructions based on conjecture do not meet the Secretary of the Interior's Standards for Reconstruction. A high level of documentation is required to meet the standard. At the same time, reconstructions must be clearly of their own time and clearly identified as contemporary re-creations.

For further information on application of the Secretary of the Interior's Standards for the Treatment of Historic Properties, I recommend you contact Brian Goekken, Chief of the Office of Technical Preservation Services at the National Park Service. He can be reached at (202) 354-2033 or brian_goekken@nps.gov.

Sincerely yours,



Elizabeth Hughes
Director
Maryland Historical Trust

Sara Taylor-Ferrell

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Monday, May 09, 2016 9:41 AM
To: SLCho; mayorcouncil
Cc: Jim Wasilak; Sheila Bashiri; 'jproakis@jnpcap.com'; 'kkuranda@rcgoodwin.com'; Stephen Orens; Nicole Walters
Subject: RE: Chestnut Lodge Project Plan Amendment PJT2015-00005

Ms. Lee-Cho,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

From: Soo Lee-Cho [mailto:SLCho@mmcanby.com]
Sent: Friday, May 06, 2016 4:31 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Cc: Jim Wasilak <jwasilak@rockvillemd.gov>; Sheila Bashiri <sbashiri@rockvillemd.gov>; 'jproakis@jnpcap.com' <jproakis@jnpcap.com>; 'kkuranda@rcgoodwin.com' <kkuranda@rcgoodwin.com>; Stephen Orens <SOrens@mcmillanmetro.com>; Nicole Walters <nwalters@rockvillemd.gov>
Subject: Chestnut Lodge Project Plan Amendment PJT2015-00005

Please see attached.

Soo Lee-Cho
Attorney



200-B Monroe Street • Rockville, MD 20850
T: 301.762.5212 • F: 301.424.9673

Law Offices Of
 MILLER, MILLER & CANBY
 ATTACHMENT C
MM&C
 CLIENT FOCUSED. RESULTS DRIVEN.

200-B MONROE STREET, ROCKVILLE, MARYLAND 20850 P: 301.762.5212 F: 301.762.6044 WWW.MILLERMILLERCANBY.COM

All attorneys admitted in Maryland and where indicated.

PATRICK C. MCKEEVER (DC)
 JAMES L. THOMPSON (DC)
 LEWIS R. SCHUMANN
 JODY S. KLINE
 JOSEPH P. SUNTUM

ROBERT E. GOUGH
 DONNA E. MCBRIDE (DC)
 GLENN M. ANDERSON (FL)
 HELEN M. WHELAN (DC, WV)

MICHAEL G. CAMPBELL (DC, VA)
 SOO LEE-CHO (CA)
 BOBBY BAGHERI (DC, VA)
 DIANE E. FEUERHERD
 MICHAEL S. SPENCER

SLCHO@MMCANBY.COM

May 6, 2016

The Honorable Bridget D. Newton, Mayor
 The Honorable Beryl L. Feinberg, Councilmember
 The Honorable Virginia D. Onley, Councilmember
 The Honorable Julie Palakovich Carr, Councilmember
 The Honorable Mark Pierzchala, Councilmember
 Rockville City Hall
 111 Maryland Avenue
 Rockville, MD 20850

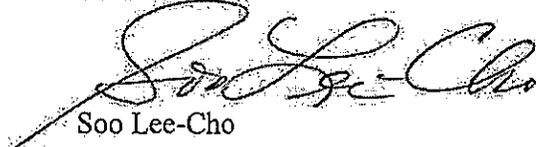
RE: JNP Chestnut Lodge, LLC, Applicant;
 Project Plan Amendment PJT2015-00005;
 Applicant's Memorandum in Support of Approval

Dear Mayor Newton and Members of the City Council:

Enclosed please find Applicant's Memorandum in Support of Approval and Response to Opposition Arguments for submission into the record of the case.

Sincerely yours,

MILLER, MILLER & CANBY


 Soo Lee-Cho

cc: James Wasilak
 Nicole Walters
 Sheila Bashiri
 James Proakis
 Stephen Orens, Esq.
 Kathryn M. Kuranda

ATTACHMENT C
JNP CHESTNUT LODGE, LLC
PROJECT PLAN AMENDMENT – PJT2015-00005

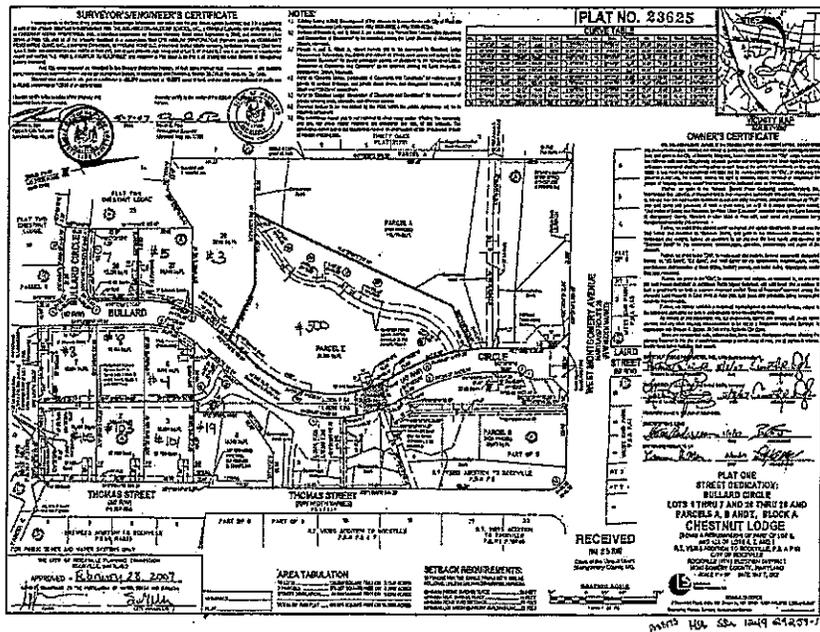
APPLICANT’S MEMORANDUM IN SUPPORT OF APPROVAL
AND RESPONSE TO OPPOSITION ARGUMENTS

I. INTRODUCTION

JNP Chestnut Lodge, LLC (the “Applicant”), by and through its attorneys, Miller, Miller & Canby, Chartered, as co-counsel in the above referenced matter with McMillan Metro, P.C., submits this Memorandum in Support of Approval and Response to Opposition Arguments to demonstrate conformance of the proposed application with all applicable review requirements and criteria, and to respond to various arguments put forth by opposition in this case.

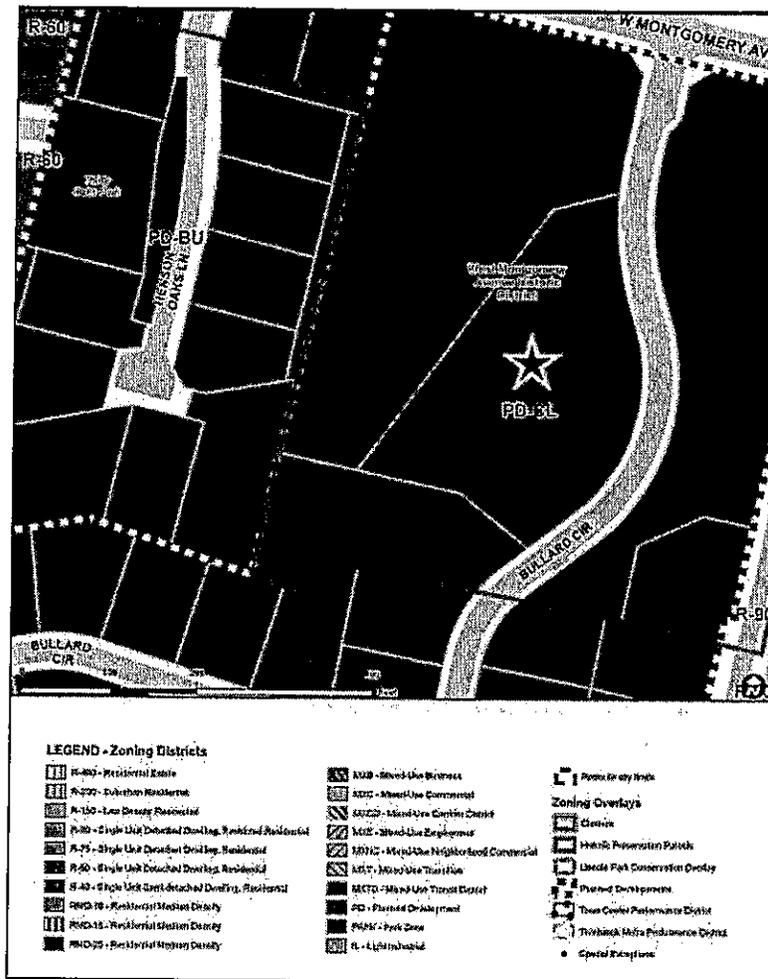
Applicant is the owner and developer of a platted parcel of land known as Parcel I of the Chestnut Lodge subdivision that is recorded in land records on Plat No. 23625 and located at 500 West Montgomery Avenue in Rockville, Maryland (“Subject Property”). (Plat 23625 with Parcel I outlined in red shown in Figure 1 below)

FIGURE 1



The subject property consists of 1.68 acres of land and is zoned PD-CL (Planned Development – Chestnut Lodge) as shown on the City’s Zoning Map for the property reproduced in Figure 2 below. The PD-CL Zone covers the entire 20.43 acre Chestnut Lodge subdivision of which the subject property is a part. Under the PD-CL Zone, the subject property has specifically been conferred a Designated Equivalent Zone of RMD-15 (Residential Medium Density) as codified in Section 25.14.18.b.2 of the City of Rockville Zoning Ordinance (“Zoning Ordinance”).

FIGURE 2



The present Project Plan application seeks an amendment of the governing documents applicable to the PD-CL Zone that covers the 20.43 acre Chestnut Lodge site, to delete the requirement that the previously approved 7 residential condominium units be located “in the Main Lodge building” and permit development of 7 residential condominium units as attached dwellings in a single structure, uniquely designed to architecturally pay homage to the former Main Lodge that was lost in a catastrophic fire.

II. PARCEL I HAS DEVELOPMENT RIGHTS TO SEVEN (7) RESIDENTIAL DWELLINGS PURSUANT TO THE ORIGINAL CHESTNUT LODGE PLANNED RESIDENTIAL UNIT (PRU) APPROVAL AND THE CITY’S COMPREHENSIVE MASTER PLAN

The original Chestnut Lodge approval (PRU2005-00022) contemplated the rehabilitation and conversion of the historic Main Lodge structure into a total of seven (7) residential dwelling units. The rehabilitation/conversion plan included construction of a new addition to the south side of the Main Lodge structure that would have housed three (3) dwelling units designed as “one-level flats”. The remaining four (4) units were to be configured as “two-level stacked townhouses” within the existing Main Lodge structure.

The 7 units that were to reside within the Main Lodge were part of a total development density of forty-four (44) units calculated for Chestnut Lodge based on its total tract area of 20.43 acres. This density calculation for the property is contained in the City’s 2002 Comprehensive Master Plan (“Master Plan”) recommendations for Chestnut Lodge. The total density approved for Chestnut Lodge was based on the level of development afforded by the

property's then-underlying R-S (Suburban Residential) Zone, which yielded a total of 44 units.¹

The development standards that were applied to the original PRU were that of the R-90 Zone which allowed for more flexibility in site design, but the application of R-90 standards to the PRU was in fact required by the Master Plan. (2002 Comprehensive Master Plan, p. 2-14 to 2-15, attached as **Exhibit A**)

As such, contrary to certain statements made at the Mayor and Council's public hearing held on April 25, 2016, it is clear that the original Chestnut Lodge PRU was granted no more density than what the City's Master Plan had always recommended for the property. It was also held to the highest standard in terms of development and design requirements, inclusive of detached garages, granite curbs and brick sidewalks, among other things.

The original PRU approval served to determine the location and layout of the 44 units on the 20.43 acre site in a manner that protected the front 8 acres of wooded and open area and facilitated adaptive reuse of the site's historic structures. But the property's entitlement to a total density of 44 units is something that originates from the City's Master Plan recommendations for Chestnut Lodge that still remain in effect.

The present Project Plan Amendment application continues to comply with the City's Master Plan. Nothing is proposed to change with regard to the approved residential nature of the use of the site or the overall level of approved residential density as a result of this Application that would warrant a different Master Plan finding than the one made to approve the original PRU. A rejection of Applicant's proposal based on an alleged non-compliance with Master Plan language supporting institutional use on the Chestnut Lodge property (as suggested by Peerless

¹ The project's total density of 44 units was calculated by dividing the property's total acreage by the minimum lot size in the RS Zone, which was 20,000 square feet, resulting in a density of 44.4 units (20.4 x 43,560/20,000).

340 Rockville) cannot be sustained and would be found clearly arbitrary in light of the City's well-documented history of its approval of residential use for Chestnut Lodge.²

As part of the original PRU approval, forest and historic conservation easements were required to be recorded over the front 8 acres of the property to protect the historic environmental setting and to preserve the vista of the property as viewed from West Montgomery Avenue as desired by the City. In so doing, the then-property owner was required to abandon four (4) previously platted, buildable lots (see Figure 3A) located along the west side of Thomas Street up to its intersection with West Montgomery Avenue within the front 8 acres of Chestnut Lodge. Figure 3B below shows the location of the 4 lots (in blue) relative to Parcel I (in red) on the subject property's plat.

As a result, Parcel I is currently the only area available on the Chestnut Lodge site on which the property's remaining density can feasibly be developed.

² The original PRU application requested waivers of R-S Zone use restrictions. One such waiver requested that Frieda's Cottage be permitted for reuse as "a museum or library by a designated non-profit organization that would document the history of the Woodlawn Hotel, Chestnut Lodge Sanitarium... or some other use acceptable to the Mayor and Council and the Historic District Commission." (PRU2005-00022, Statement of Chestnut Lodge Properties, Inc. in Support of Exploratory Application for PRU Development, p. 1, 7-8, attached as Exhibit B) The waiver for Frieda's Cottage was not supported and ultimately withdrawn by the applicant.

III. IF MULTI-FAMILY DWELLINGS AS A TYPE OF RESIDENTIAL “USE” IS ACCEPTABLE IN THE HISTORIC DISTRICT, THEN WHY NOT TOWNHOUSES?

The opposition’s argument that *reconstruction* of the former Main Lodge building should be required of the Applicant in this case, whether or not it can be done in accordance with the Secretary of Interior’s *Standards for Reconstruction*, relates entirely to the “form” of development that they believe should be allowed on Parcel I. The issue over which the Mayor and Council has jurisdiction to resolve in this Project Plan Amendment, however, is not the “form” of development, but whether Applicant’s proposal presents an allowable “use” on the property as a zoning matter.

The final authority for decisions regarding the appropriate “form” of development on properties within the City’s historic districts resides in the Historic District Commission through the Certificate of Approval process. In that regard, the issue of “form” has already been preliminarily addressed in this matter by the Historic District Commission through two (2) Courtesy Review sessions held with the Applicant on June 18, 2015 and on November 19, 2015. Some concerns were raised by the HDC with the initial proposal at the first Courtesy Review. The project architect incorporated comments received and came up with the present design, which was then well received by the HDC at the second Courtesy Review.

In regard to the “use” issue that is before this Mayor and Council, a significant fact that must be considered is the zoning precedent that has been established by the City with regard to the Chestnut Lodge property. As mentioned previously, the 7 residential condominium units in the Main Lodge building required a waiver of the then-R-S Zone’s use restrictions. Such a waiver, while allowable under the City’s PRU approval process pursuant to Section 25-548 of the 1989 Rockville Zoning Ordinance, was nonetheless significant. In the hierarchy of residential

dwelling types, multi-unit dwellings are considered to be more urban in nature/character and therefore less compatible immediately adjacent to existing single-family detached neighborhoods than townhouses/attached units. If a waiver of use restrictions was appropriate for multi-family units to be located in the Main Lodge building, why not townhouses that are permitted by right under the property's current RMD-15 zoning, especially ones that are so meticulously designed to appear not like typical townhouses, but as a single unified structure as proposed by the Applicant?

As reflected in the rendered elevations presented at the April 25, 2016 public hearing and again in the images shown in Figures 4A/4B and 5A/5B below, the single building development proposed by this Project Plan application for Parcel I, is sympathetically designed to be reminiscent of the distinct architecture of the former Main Lodge. The images make abundantly clear that these are not your run-of-the-mill stick townhouses.

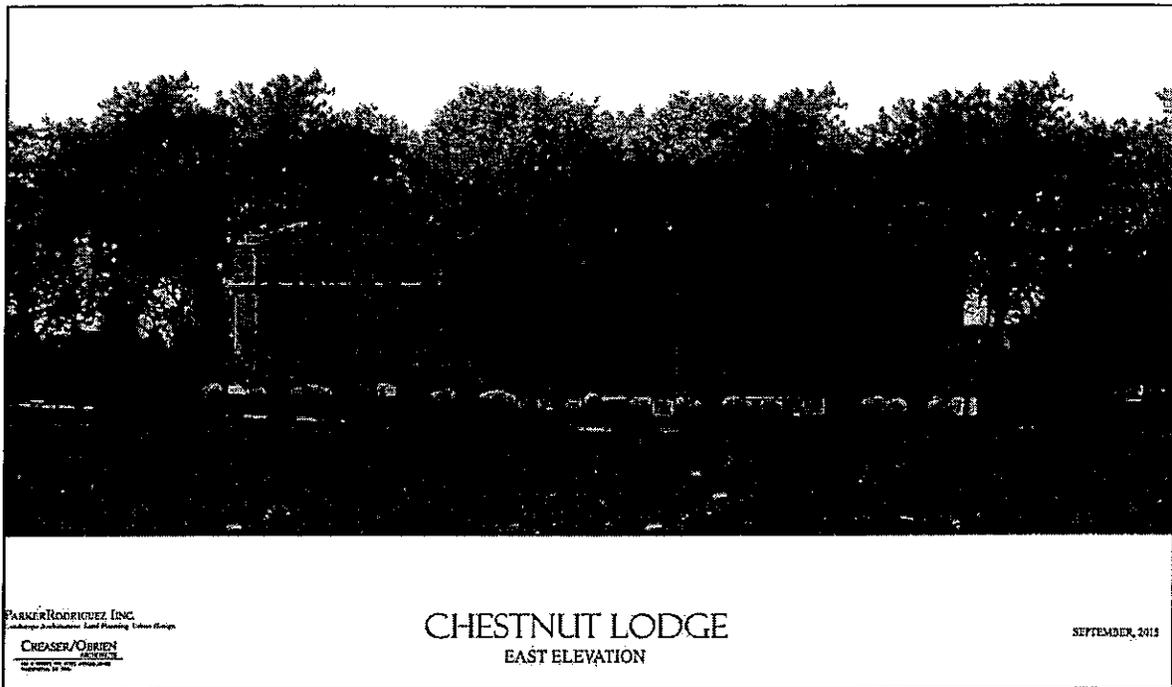
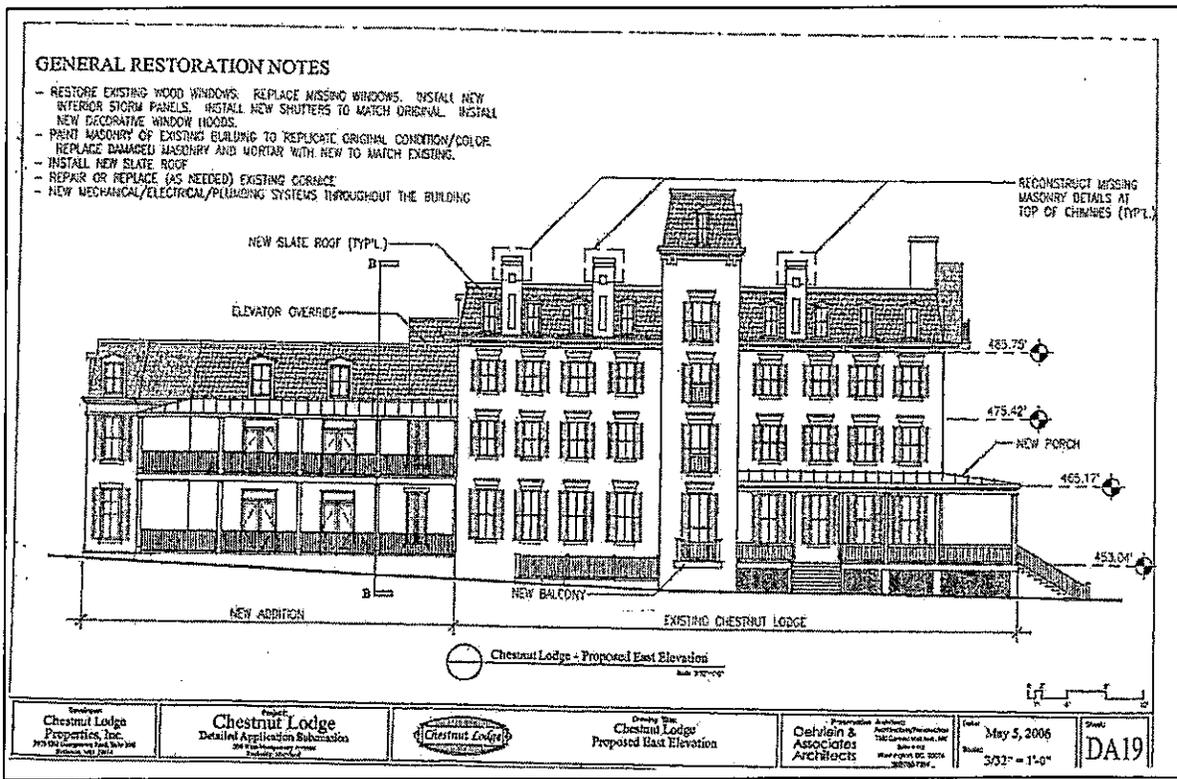


FIGURE 4B



ATTACHMENT C
FIGURE 5A

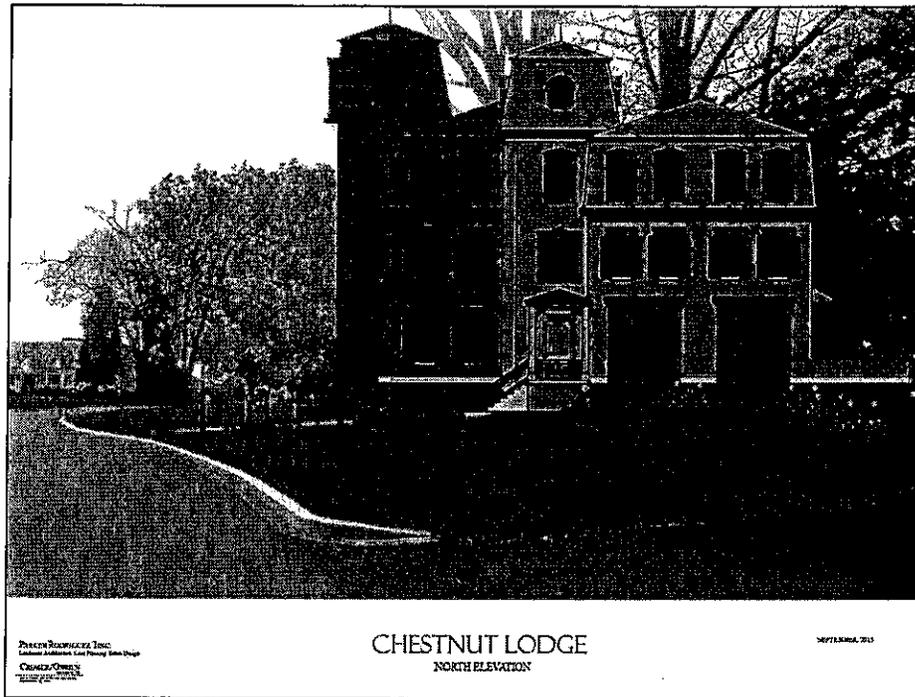
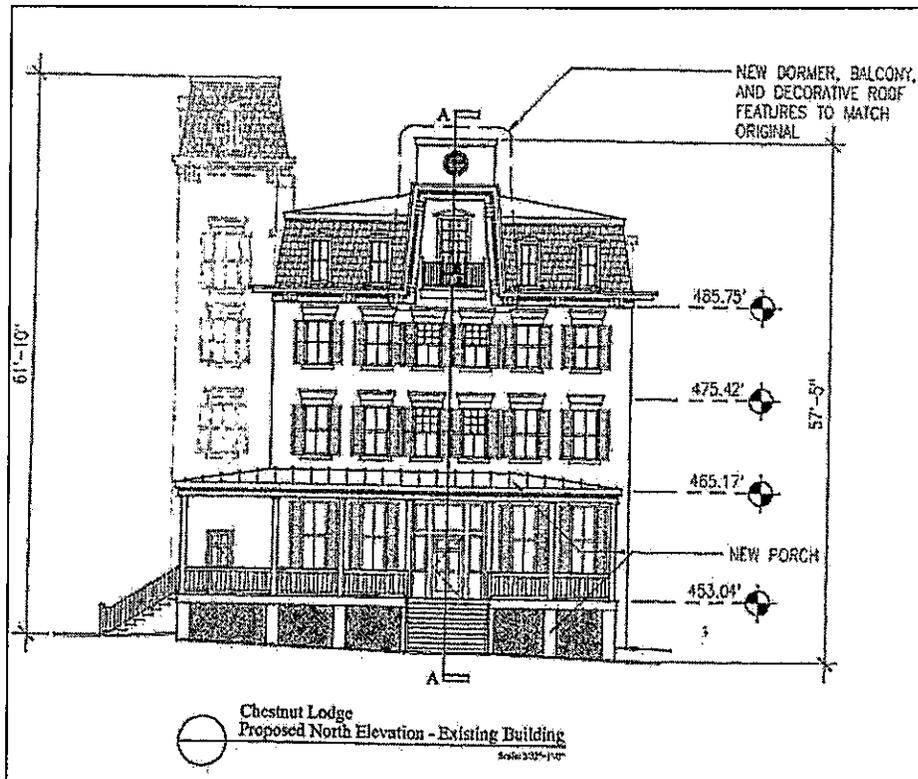


FIGURE 5B



The architectural style of the proposed building is a simplified version of the Second Empire Style with brick veneer finish, mansard roofs with fiberglass shingles as well as simulated slate shingles, mansard roofs with gabled dormer windows on the 3rd floor, taller 1st story windows and wrought iron galleries. In addition, projecting central pavilion towers have been incorporated that are reminiscent of the former Main Lodge. The towers have fourth-story mansard roofs with gabled dormer windows and decorative brackets.

Subsequent to the Mayor and Council's public hearing held on April 25, 2016, the Applicant had the project architect add an all brick veneer finish to the West Elevation, shown below in Figure 6, to further enhance the unified look and four-sided finish of the proposed building.

FIGURE 6

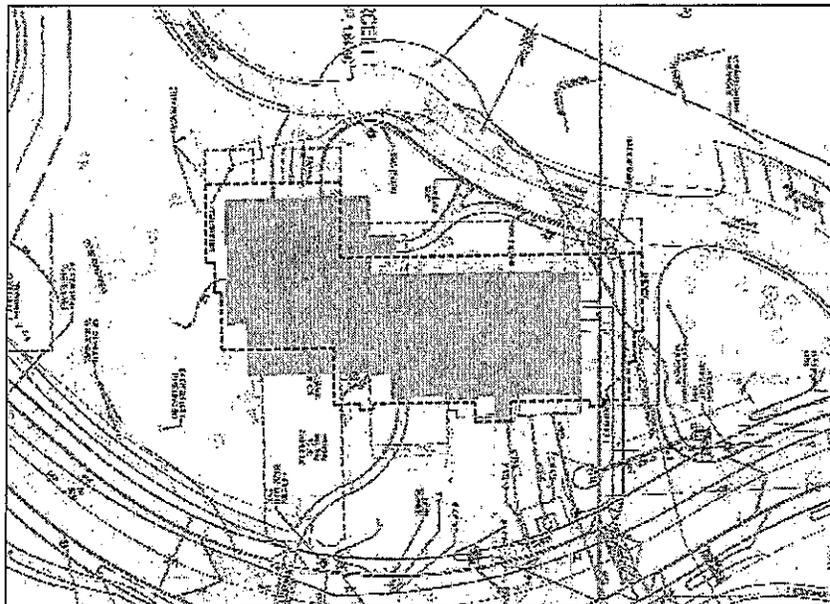


IV. APPLICANT'S PROPOSED BUILDING IS SUBSTANTIALLY SIMILAR IN MASS. SCALE AND ARCHITECTURAL DESIGN TO WHAT THE ORIGINAL PRU APPROVED FOR THE MAIN LODGE RENOVATION

In developing the proposed building's design, the project architect studied the original PRU's concept drawings for the Main Lodge rehabilitation/renovation. (See Figures 4A/4B and 5A/5B above, pp. 9-10) The goal was to achieve a high-quality, monumental building of singular design that incorporates the best and most distinctive architectural features of the former Main Lodge into a building form that is both achievable under current building code constraints as well as sustainable for future owners/residents.

The width of the proposed building's footprint (outlined blue in Figure 7 below) is substantially consistent with the original PRU (shaded gray in Figure 7 below), with an increase in length of 25% within an existing paved area of the site. The green lines represent the deck areas that have been extended out over the concrete parking pads of each unit in order to screen from view both the garage door as well as any parked cars.

FIGURE 7



By providing additional covered parking behind the garages of each unit, the project has eliminated the need to create any additional surface parking spaces located along the shared private driveway. The architect's design solution to mask the visibility of the individual garage doors resulted in a significant reduction in new impervious area, thereby, reducing impacts to existing trees located to the west of the shared private driveway and allowing for more natural screening and maintenance of the historic treed setting.

In finding that the proposed project is not consistent with the approved PRU, the Planning Commission commented that they felt the proposed building's footprint (along with the building's exterior presumably) should be required to match that of the original PRU approval exactly. The problem with this finding, however, is that it is not at all supported by the City's Zoning Ordinance.

First as supported by Planning Staff, a less than 33% increase in the overall footprint is a relatively modest and reasonable amendment request. But what is further evidenced by Figure 7 above is that the proposed building footprint in fact substantially maintains the overall shape and building orientation of the original footprint despite the increase.

The Planning Commission's insistence that the Application be held to a "strict compliance with the original PRU standard" directly contradicts the existence of specific provisions in the City's Zoning Ordinance that prescribe the type of amendments that may be filed to change aspects of previously approved planned development projects such as Chestnut Lodge to increase density, height, or add new uses, etc. Significantly, the Zoning Ordinance specifies that these requested changes are "subject to the Equivalent Zone development standards" as opposed to being subject to a finding of consistency with the original PRU as the

Planning Commission erroneously applied in this case. Section 25.14.07.e.1 of the Zoning Ordinance provides in relevant part as follows:

e. Amendment of a Planned Development

1. *Required, General* – The following are Planned Development amendments subject to the Equivalent Zone development standards and will require approval of an amendment to the Planned Development Governing Documents by the Mayor and Council.
 - (a) Any **increase in the intensity of the development** (dwelling units, gross square footage, etc.) beyond what is authorized in the Planned Development Governing Documents;
 - (b) Any **increase in the building heights** beyond what is authorized in the Planned Development Governing Documents;
 - (c) **Addition of new uses not approved in the Planned Development Governing Documents...**

(Emphasis added) A strict compliance standard as applied by the Planning Commission would render the above Zoning Ordinance provisions meaningless and, as such, must be rejected.

Instead, the appropriate analysis is whether Applicant’s proposal complies with the standards of Parcel I’s designated equivalent zone, i.e., the RMD-15 Zone, which it does. (See Figure 8 below for excerpt Land Use Tables found in Section 25.11.03 of the Rockville Zoning Ordinance Use Table)

FIGURE 8

	Uses	Zones		
		Residential Medium Density RMD-10	Residential Medium Density RMD-15	Residential Medium Density RMD-25
a. Residential uses	Dwelling, attached	N	P	P
	Dwelling, semi-detached (duplex)	P	P	P
	Dwelling, single unit detached	P	C	C
	Dwelling, multiple-unit	N	P	P
	Dwelling, Townhouse	P	P	P

V. RECONSTRUCTION OF THE MAIN LODGE IN COMPLIANCE WITH THE SECRETARY OF INTERIOR'S STANDARDS FOR RECONSTRUCTION IS NOT POSSIBLE

Members of the Planning Commission and others have suggested that historic photos depicting the Main Lodge's exterior at a distance (such as the one taken in 2003 and shown in Figure 9A below) might be used to somehow recreate the exterior in a manner that is "close enough" to the original. At the March 9, 2016 Planning Commission at which this Application was considered, the Chairman suggested that an older black and white photo of the Main Lodge as it is believed to have looked during the Woodlawn Hotel Era could be digitally recolored to assist in the building's recreation.

For reasons detailed by the Applicant's historic preservation consultant, Kathryn M. Kuranda, in both oral and written testimony submitted for the record that has been further corroborated by the Maryland Historical Trust in a letter dated April 22, 2016 responding to a request for technical assistance submitted by Ms. Kuranda on behalf of the JNP Chestnut Lodge, LLC, reconstruction of the Main Lodge in a manner that conforms to the Secretary of Interior's Standards for Reconstruction is simply not possible based on such photographic information.

First, what is not clear from those advocating for "reconstruction" in this case, is what exactly would they have "reconstructed"?

1. Is it the Main Lodge as it looked in the 2003 photograph shown in Figure 9A below?
2. Or, is it what the Main Lodge was supposed to look like after being renovated and added on to under the PRU approval?

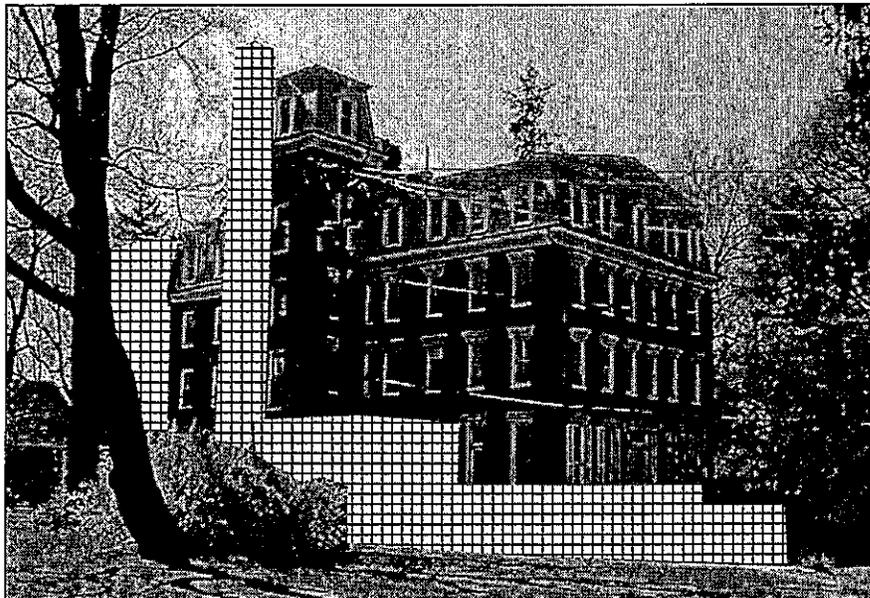
If it's no. 1, then would the non-historical elements attached to the building in 2003 that were going to be removed under the original PRU need to now be reconstructed? Figure 9B

below highlights the areas of the building shown in the 2003 photo that were approved to be demolished under the original PRU. If it's no. 2, then it clearly can't be a reconstruction since the Main Lodge never existed in that form ever in history.

FIGURE 9A



FIGURE 9B



VI. CONSTRUCTION OF A 7-UNIT MULTI-FAMILY PROJECT WITH UNDERGROUND PARKING IS ECONOMICALLY INFEASIBLE

A 7-unit multi-family project simply cannot sustain the costs associated with the construction of an underground garage. The only reason that the 16-space garage, proposed by the original PRU underneath the new addition portion of the renovated Main Lodge, was considered possible at the time was because the cost of constructing the garage could be allocated as a cost to the entire development and covered by the sale of the 36 single-family units in the community. But, as we all are well aware, the situation changed drastically with the collapse of the housing market in 2008. Construction on the first model home had not even completed yet.

In the present case, there is no opportunity to offset some of the construction cost of an underground garage with sales from other units within the development. It must all be absorbed by the 7-units in their purchase prices and their monthly condo dues. At a cost ranging from \$30,000-\$55,000 per space for construction of underground parking, each unit would need to absorb a minimum of \$60,000 to potentially as much as \$110,000 for two parking spaces.

The Applicant surveyed the development community to find small unit count multi-family projects with underground parking. The nearest comparable found was a newly constructed 14-unit condo project in Arlington, VA (Columbia Place Condos). According to the developer/builder of that project, the monthly condo fee is driven primarily by the maintenance costs of the underground parking and is over \$700 per month which is not sustainable. The amount would no doubt be higher when shared by only 7 units. But for any dwellings located on Parcel I, there will also be the added financial burden of the overall Chestnut Lodge HOA fee,

353 which is currently \$350 per month. A total condo/HOA fee of over \$1,000 for a 2,200 square foot unit at a likely sales price of \$594,000 is simply not marketable.

ATTACHMENT C

Both the construction and the on-going maintenance of an underground structure are not cost-effective, practical or marketable. Simply, a decision by the City that results in limiting Parcel I's development options to a multi-family structure with underground parking, as suggested by the opposition, would essentially be akin to a 'no build' decision/action.

VII. PROPOSED PROJECT COMPLIES WITH ALL APPLICABLE DEVELOPMENT STANDARDS AND REQUIREMENTS

As analyzed in detail in the Planning Staff Report to the Planning Commission, the proposed Project Plan Amendment complies with all applicable development standards and requirements of the City and has been found to pass all the City's adequate public facilities standards/tests, inclusive of roads/transportation, water/sewer, schools and fire/emergency service. A Pre-Application SWM Concept has also been approved for the project.

With regard to compliance with the City's forestry regulations, the Applicant has worked diligently with the City Forester to resolve any and all tree issues. The project will in fact preserve some significant trees that had previously been slated for removal under the original PRU's forest conservation plan. A Consulting Arborist Report (attached as Exhibit 11 to the Planning Commission Staff Report in the record), which outlines specific measures to be utilized before, during and after construction to mitigate impact to significant trees, has been accepted/approved by the City Forester.

VIII. FINDINGS REQUIRED FOR PROJECT PLAN AMENDMENT APPROVAL

Based on all the above, the subject Project Plan Amendment fully satisfies all the required findings of Section 25.07.01.b.2 as follows:

1. Does not adversely affect health or safety of persons residing or working in the neighborhood;
2. Is not in conflict with the Plan;
3. Will not overburden existing and programmed public facilities as provided in the adopted Adequate Public Facilities Standards;
4. Will not constitute a violation of any provision of this chapter or of other applicable law; and
5. Will not adversely affect the natural resources or environment of the City or surrounding areas.

IX. CONCLUSION

This Project Plan Amendment proposes to construct a high-quality, monumental building of unified/singular design to house the remaining 7 dwelling units approved under the original Chestnut Lodge PRU on Parcel I. Careful attention has been given to incorporate the most distinctive architectural features of the former Main Lodge and to finish all four facades in a way that honors the lost structure but does not create a false sense of history. The attached units with individual garages, while disliked by some, serve as the best means to both facilitate the most viable and economically sustainable use for the site and to preserve/protect the historic treed setting around Parcel I, which in and of itself deserves to be protected as a distinctive feature of the property. An underground garage, which would require significant excavation work, would

355 do far more damage to existing trees than the individual garages proposed by the subject Project Plan.

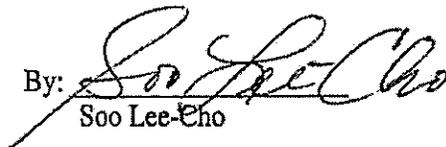
ATTACHMENT C

Based on all the above, we respectfully request the Mayor and Council's approval of Project Plan Amendment PJT2015-00005.

Respectfully submitted:

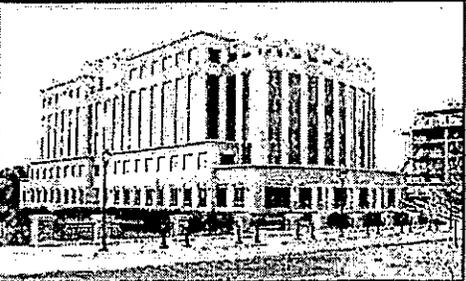
MILLER, MILLER & CANBY

By:


Soo Lee-Cho

200-B Monroe Street
Rockville, Maryland, 20850
(301) 762-5212
slcho@mmcanby.com

Attorneys for Applicant



City of Rockville Comprehensive Master Plan

Approved and Adopted
November 12, 2002



City of Rockville, Maryland

EXHIBIT

A

tabbles

357

ATTACHMENT C

Infill

Development can occur in a variety of ways. Because there are so few large properties that are undeveloped within the City, most development will be either redevelopment of an existing site, expansion of existing buildings to accommodate increased use, or development of vacant properties that are within either existing commercial, industrial, or residential subdivisions. It is generally desirable that the quality of the infill development be compatible in use, architecture, and scale to the surrounding structures. This is especially true in residential neighborhoods.

Critical Parcel/Area Analysis

The land use and zoning pattern in Rockville is well established and is generally appropriate for the future. This section addresses only sites where an alternate land use or zoning category would provide greater compatibility with the surrounding neighborhood or where there are other land use or zoning alternatives to achieve either smart growth initiatives or environmental protection. To that end, some properties are recommended for development as either Comprehensive Planned Development (CPD) or as a Planned Residential Unit (PRU). As previously noted, CPDs allow large areas to be developed as a single development containing a mix of uses and housing types and open space. PRUs allow for a mix of residential unit types and common open space areas, while providing for flexibility in site design through a waiver of normal zoning development standards.

In general, only sites above five acres are included in this analysis. If sites with development potential are not mentioned, the zoning and land use recommendations on those sites are not recommended for change with the exception of a few small sites that are discussed separately under potential zoning changes or text amendments.

The following Town Center sites are included in the Town Center Master Plan: the Rockville Metro Station site, North Stonestreet Avenue, and the Board of Education properties along North Stonestreet Avenue. The Critical Parcel/Areas Map shows the sites discussed in this chapter. Although not discussed in each individual critical parcel description, it should be understood that each development will follow the *Environmental Guidelines*, stormwater management requirements, *Street Tree Master Plan* recommendations, and Historic District regulations as applicable. It should also be noted that the City strongly encourages community input in the development process.

Critical Parcel/Area #1**Chestnut Lodge, 500 West Montgomery Avenue**

Chestnut Lodge has a long history as a private psychiatric hospital. The main building was constructed in 1889 as the Woodlawn Hotel. In 1906, Ernest Bullard purchased the property, changed its name to Chestnut Lodge, and operated the facility as a private sanitarium, which became a nationally known psychiatric hospital. More recently, Community Psychiatric Clinic, Inc. (CPC) operated the facility until bankruptcy.

Two southern portions of the property were sold and subdivided for single family housing for the Rose Hill and Rose Hill Falls subdivisions. However, the historically significant

358

Woodlawn Hotel/Chestnut Lodge and numerous other buildings remain on the 20.4-acre site. There is also a significant stand of mature trees and a small wetland on the site. Along West Montgomery Avenue, the first 200 feet of the property is within the West Montgomery Avenue Historic District. The site is zoned RS (20,000 sq. ft. minimum lot size). The preservation of the historic buildings and the site's mature trees and limiting traffic impacts are key concerns.

There are a variety of development options for the property, including utilizing the current buildings in an institutional use, a hotel or spa use, an adult living facility, single family housing under the provisions of the R-S Zone, development under a Special Development Procedure such as variable lot size development, cluster development, or Planned Residential Unit (PRU) or Comprehensive Planned Development (CPD) with restrictions.

Recommendation

This plan recommends that the site be maintained in an institutional use and retain its R-S Zone in order to offer as much protection as possible for the site's historic buildings and mature trees. A residential use on the property may be acceptable if the historic buildings and trees are protected. Development under a Special Development Procedure, such as a variable lot size development, cluster development or Planned Residential Unit (PRU), is recommended if the historic and tree preservation goals are achieved. Development under the Planned Residential Unit development procedure is preferred for its flexibility in site design. However, the number of new residential dwellings on the property should be limited to the base level of development afforded by the R-S Zone, and by the goal of this plan to retain the setting of the historic structures and treed area along West Montgomery Avenue with as little disturbance as possible. The governing minimum lot size, maximum lot coverage and minimum setback requirements that apply to the property shall be those of the R-90 Zone in order that the new development be compatible with existing surrounding neighborhoods. In addition, landscaped buffer areas must be provided on the eastern, southern and western property boundaries, adjacent to existing residential dwellings. Given the property's relationship to the historic character of the West Montgomery Avenue streetscape, it is appropriate for an expanded portion of the property to be located within the West Montgomery Avenue Historic District, and for additional design review of new structures on the remainder of the site by the HDC to ensure their compatibility. This plan recommends against allowing C-1 uses that are normally permitted in a planned residential unit development. Finally, a hotel/spa use in the Main Lodge Building may be an acceptable use as long as it is limited primarily to the existing buildings, without major additions, and is buffered from the adjacent neighborhoods, and protects the site's historic buildings and trees. This would require either a text amendment or the creation of a new zone to provide for this option.

Critical Site #2

Buckingham Property, 522 West Montgomery Avenue

This is a four-acre site located immediately to the west of the Chestnut Lodge property. Until his death, Dr. Buckingham lived on the property and operated a veterinarian practice there.

ATTACHMENT C



ATTACHMENT C
STATEMENT OF CHESTNUT LODGE PROPERTIES, INC.
IN SUPPORT OF EXPLORATORY APPLICATION
FOR PLANNED RESIDENTIAL UNIT DEVELOPMENT

I. DESCRIPTION OF THE PROJECT

Chestnut Lodge Properties, Inc. seeks approval to develop 20.4 acres of land known as the Chestnut Lodge Property located on the South side of West Montgomery Avenue, (Maryland Route 28) in Rockville, Maryland ("the Property") in accordance with the Special Development Procedures - Planned Residential Unit Development (PRU) - techniques of Article XII, Division 4 of the City of Rockville Zoning Ordinance.

This PRU Exploratory Application ("Application") proposes the construction of 36 new single family detached family homes, the rehabilitation of the existing "Little Lodge", as the 37th home and the rehabilitation and preservation of the historic "Lodge" (Woodlawn Hotel) into seven (7) luxury condominium units (with its addition) with underground parking, for a total of 44 residential dwelling units on the Property compatible with the Master Plan guidelines.

Frieda's Cottage is an existing structure located on the property which will be deeded to a non-profit historical organization such as "Peerless Rockville" to be used as a museum or a library that documents the history of the Woodlawn Hotel, the Main Lodge in its various uses (including as a psychiatric hospital) the site and the City of Rockville. Open spaces and passive recreational areas are proposed in several locations. The eight acre open space historic area in front of the Main Lodge will be preserved by a conservation and maintenance easement.

Vehicular access to the Property is limited to one main entry street on West Montgomery Avenue, opposite Laird Street. The right-of-way for the entry road generally will be 28 feet wide in keeping with the scale and historical character of the front of the Chestnut Lodge Property and will be aligned and constructed so that it



IV. DENSITY OF THE DEVELOPMENT

The Property is currently zoned RS. This PRU application proposes a development density of 44 residential dwelling units, which is the base level of development afforded by the RS Zone, in accordance with the above Master Plan recommendations.

The recommended residential density for the Property is calculated by dividing the Property's total acreage by the minimum lot size in the RS Zone, which is 20,000 square feet, resulting in a recommended density of 44.4 units ($20.4 \times 43,560/20,000$). Accordingly, this PRU application proposes development of 44 residential dwelling units -- 36 new single family detached homes, the rehabilitation and sale of the "Little Lodge" as the 37th home, and the rehabilitation and addition to the historic Lodge building to create seven (7) viable luxury condominiums with underground parking.

V. WAIVER OR MODIFICATION OF USE RESTRICTIONS (OF THE RS ZONE)

This PRU application proposes to rehabilitate and preserve the original historic Chestnut Lodge building by first removing the existing non-historic addition and then constructing a new addition which would allow reuse of the entire Lodge structure as seven (7) residential condominium units. In order to facilitate the proposed adaptive reuse of the Lodge, this PRU application requests a waiver from the use restrictions found in Section 25-296 of the Rockville Zoning Ordinance to allow "multiple-family dwellings" as a permitted use on this RS zoned property.

In addition, this PRU application proposes that the existing Frieda's Cottage (formerly a residence) be permitted to be reused as a museum or library by a designated non-profit organization that would document the history of the Woodlawn Hotel, Chestnut Lodge Sanitarium, the overall site and the City of Rockville or some other use acceptable to the Mayor and Council and the Historic District Commission. In

order to facilitate this proposed reuse of Frieda's Cottage, this PRU application requests a waiver from the use restrictions found in Section 25-296 of the Rockville Zoning Ordinance to allow a "library, museum, art gallery" as a permitted use on this RS zoned property.

VI. MODIFICATION OF ROAD STANDARDS

A modification of the road standards is requested for all public rights-of-way pursuant to Section 21-20 of the City of Rockville Code. The right-of-way for the internal street in the historic area along the front of the Property will be 27 feet 4 inches in width with the exception of the entrance on West Montgomery Avenue. No curb and gutter on the entrance road will be provided in the historic district other than at the entrance. This road section has been selected because it is compatible with the existing setting and helps to preserve the historic character of the Property.

The public street in the "new" detached single family portion of the Property will be within a 27 foot 4 inch wide right-of-way and provide 26 feet of paving. The application proposes that the following two typical sections be located wholly on private property and outside of the public right-of-way:

- The first proposes a five (5) foot wide planting strip (measured from the rear of the proposed curb), a five (5) foot wide brick paver sidewalk, and an additional five (5) foot planting strip will contain the gas line. All of which will be subject to a utility and maintenance easement, i.e., PUE.
- The second typical section pertains to lots inside the street loop. The application proposes to provide a 15 foot planting strip (measured from the rear of the proposed curb) which will be subject to the PUE and the gas and maintenance easement. A five by eight (5 x 8) foot brick paver pad will be installed behind the curb to provide a landing for the

Sara Taylor-Ferrell

362

ATTACHMENT C

From: Sara Taylor-Ferrell
Sent: Monday, May 09, 2016 9:43 AM
To: ANDREW SELLMAN; mayorcouncil
Cc: Patricia Woodward; noreen bryan
Subject: RE: Add to public record for Mayor and Council, including this email for the April 25, 2016 Mayor and Council Public Hearing on Project Plan PJT2015-00005

Mr. Sellman,

On behalf of the Mayor and Council, thank you for your comments on Chestnut Lodge PJT0005. Your comments will be placed into the official record and considered by the Mayor and Council.

The Mayor and Council appreciate your comments.

Sincerely,

-----Original Message-----

From: ANDREW SELLMAN [mailto:sellmana@verizon.net]
Sent: Friday, May 06, 2016 4:38 PM
To: mayorcouncil <mayorcouncil@rockvillemd.gov>
Cc: Patricia Woodward <myjag2013@yahoo.com>; noreen bryan <noreen1945@yahoo.com>
Subject: Add to public record for Mayor and Council, including this email for the April 25, 2016 Mayor and Council Public Hearing on Project Plan PJT2015-00005

REF: 9. Public Hearing on Project Plan PJT2015-00005, for the amendment of the Chestnut Lodge Planned Residential Unit (PRU2005-00022) to allow for seven (7) townhouse units instead of seven (7) multifamily units on the former Main Lodge property, and to allow for a maximum height of 51.5 feet where 40 feet is allowed in the equivalent zone of RMD-15; JNP Chestnut Lodge LLC, applicant.

Attached is a Declaration of Covenants for the Chestnut Lodge Property, establishing the HOA, its' responsibilities and duties. Of particular note is the definition of (5) parcels identified as 'historic' (Historic "Conservation" Easements) - not the buildings, but the 'parcels' of ground. Included in the Declaration is a definition of Parcel 'I', which is the ground upon which the Chestnut Main Lodge building stood, until the building burned in June 2009. The property owner quickly demolished and removed the surviving remnants of the building within a week, leaving just a vacant, flat site.

This 2007 Declaration was executed and acknowledged by the President and Managing Member of Chestnut Lodge Properties, Inc., Morton H. Levine.

This is a text-searchable PDF file of 4MB. It is text-searchable if you are using the free Adobe Reader DC application. It makes it much easier to search for any keywords you may be looking for.

Andrew Sellman
411 West Montgomery Avenue
Rockville, MD 20850
301-610-5691
sellmana@verizon.net

CHESTNUT LODGE

DECLARATION OF COVENANTS AND CONDITIONS

THIS DECLARATION OF COVENANTS and CONDITIONS is made as of this 16th day of May, 2007, by CHESTNUT LODGE PROPERTIES, INC, a Maryland corporation, and THOMAS ROAD, LLC, a Maryland limited liability company, (collectively, the "Declarant") and is based upon several predicates set out below:

A. The Declarant is the owner and developer of a property located within the City of Rockville, Maryland (hereinafter referred to as "Rockville"), known as "Chestnut Lodge," comprised of 20.4 acres, as described in **Exhibit A**, which land and its improvements is hereafter called the "Property" and intended to be bound to the terms of this Declaration. Application has been made to Rockville for the development and improvement of this property, including the portions within the Rose Hill and Chestnut Lodge Historic Districts, seeking development approval to permit the subdivision of the property and the construction of thirty six detached residences, as well as seven condominium residences within the Chestnut Lodge Sanitarium building on Parcel I, Block A, Plat One. Included in the construction and rehabilitation to be accomplished are the restoration of an historic residence known as "Frieda's Cottage" on Lot 4, Block A, Plat One, with the subsequent conveyance to Peerless Rockville Historic Preservation, Ltd. ("Peerless"), which plans to rehabilitate that structure. Various other historic structures will also be preserved and rehabilitated.

B. In the course of the study and review of the Declarant's plans by Rockville, the City's planners, historians, horticulturists and arborists made numerous recommendations and suggestions regarding the development of Chestnut Lodge. The Mayor and Council have adopted Resolution 3-06, Application No. PRU2005-00022, with conditions, for the Planned Residential Unit development of the Chestnut Lodge property (the "Property").

C. Among the conditions of the Resolution are requirements that various buildings on the Property be preserved and rehabilitated, that certain areas be subjected to various easements, including but not limited to "conservation easements," and that a homeowners association be created, comprised of all home owners in Chestnut Lodge with certain parcels of land to be conveyed to that association, and a variety of responsibilities impressed upon that association for the

364 perpetual care and maintenance of portions of the Property. ^{ATTACHMENT C} The association of all property owners will be known as the “Chestnut Lodge Community” (“CLC”) and will be an unincorporated association under the laws of the State of Maryland and will constitute a “homeowners association” as defined in and controlled by §11B-101 of the Real Property Article of the Annotated Code of Maryland.

D. This “Declaration of Covenants and Conditions” (the “Declaration”) is intended to serve as the organizational and governance document of CLC, as well as the source of the covenants and easements required to be impressed on the Property by the terms of the Resolution adopted by the Mayor and Council.

E. The Declaration is organized in three sections:

The first, “Required Conditions of Title,” is the expression of the several affirmative and negative covenants required by the City to bind and run with the “land”—in some instances, the “Land” will be the Property, that is every piece of the Property—in other instances, conditions of title may be described which bind only CLC property, or portions of CLC property which has been historically designated, on certain individual Lots. These “required conditions” will be numbered sequentially and keyed by reference to the sections of the Mayor and Council’s Resolution which mandated the existence of the condition. As a result, the order of the presentation of these conditions will be the direct result of the sequence of portions of the Resolution, rather than any analytic logic.

The second, “Declaration of Community Agreements,” is the section which will most nearly approximate the role often seen in homeowners’ association documents identified as the “Declaration” and will set out certain covenants, easements and conditions necessary to the operation of the CLC.

Finally, the Section captioned “Governance of the CLC” will resemble the typical “By Laws” associated with a homeowners association and will address organizational topics, such as voting mechanism, elections, officers, committees, budgets and assessments—some of which topics are also treated in the “Declaration of Community Agreements” section.

F. The Declarant intends that all of the conditions of title required to satisfy the Resolution of the Mayor and Council will be set forth in this Declaration. Further, this Declaration will be the principal “how to” manual of the CLC. It may be amended without the authorization or permission of any homeowner provided that the directed amendment does not negatively impact to a material extent the utility or value of the property of a homeowner.

G. All of the covenants and conditions imposed by this Declaration are intended to preserve and promote the value of the Community, the well-being of its

365 residents and to support the principles, goals and concerns enunciated by the Mayor and Council of the City of Rockville in their study of Chestnut Lodge. **ATTACHMENT C**

SECTION ONE

REQUIRED CONDITIONS OF TITLE

As established in Resolution No. 3-06 of the Mayor and Council of Rockville

The conditions of title expressed herein are declared to bind the lots and parcels to which they are referred and will run with the title thereto in perpetuity, unless otherwise expressed, to the benefit of the City of Rockville and the Chestnut Lodge Community and its residents.

The numbering of the conditions is set forth sequentially as they occur in Resolution No.3-06, followed by a reference to the section number of the Resolution from which the requirement or condition has arisen.

1. **2.(a) Garages.** Garages serving single family detached dwellings must not be used for any use other than as a garage, except in the case of the "Stable," located on Lot 28, Block A, Plat One and the "Rose Hill Barn." Lot 13, Block A, Plat Two, where garage uses with a second story accessory use other than an accessory apartment will be permitted
2. **2(c) Parcels A, and B, Block A, Plat One and Parcel C, Block B, Plat Two,** as identified in **Exhibit B**, attached hereto, and subject to boundary adjustment at Detailed Application, must be conveyed to CLC and held and maintained by CLC for the use and benefit of the members of CLC, subject, however, to a "peripatetic easement"—as hereafter defined—for the benefit of member and non-member pedestrians.
3. **3.e.iii.E Barn/Creamery-Rose Hill Mansion Area.** This area, as depicted on **Exhibit C**, as well as the area identified as "Parcel J, Block A, Plat Two," are hereby declared subject to a negative covenant to the end that no construction, fencing, landscaping or other improvement of any kind may be placed or allowed within these areas without the approval of the Historic District Commission of the City of Rockville, Maryland (hereinafter referred to as the "Historic District Commission"). The aforesaid Parcel J must be conveyed to CLC and maintained as a part of the Community's "common area." Notwithstanding the foregoing, if approved by the City of Rockville Planning Commission (hereinafter referred to as the "Planning Commission"), the area of Parcel J may be incorporated as a part of the area of an adjacent single-family lot, subject, however, to the negative covenant regarding improvements thereon.

3664. 3(g) **"Parcel C."** Parcel ^{ATTACHMENT C} "C, Block B, Plat Two", as shown on Exhibit D must have an area of not less than 8,000 square feet and must be conveyed to CLC, subject to the terms of the "Peripatetic Easement" defined in Item 6, below.

5. 4 (a)(b) **Historic "Conservation" Easements** Those areas of the Property within the West Montgomery Avenue and Rose Hill Farm Historic Districts (as defined and promulgated on publications of the City of Rockville), to include Little Lodge (Lot 28, Block A, Plat One), Frieda's Cottage (Lot 4, Block A, Plat One), the Stable, (Lot 28, Block A, Plat One) the Barn/Creamery, (Lot 13, Block A, Plat Two) the Ice House, (Lot 28, Block A, Plat One) Parcel J, Block A, Plat Two, the Main Lodge, Parcel I, Block A, Plat One, and portions of Lots 10, 11, 12 and 13, Block A, Plat Two, as well as the "tree lawn" area within Parcels "A" and "B" (Block A, Plat One) must be maintained in a manner consistent with their "historic" status and this covenant to "conserve" and maintain the areas above-mentioned is understood to be imposed upon the owner of each of the referenced Lots. The responsibility to maintain those lots and the improvements thereon will be at the owners' sole expense, subject, however, to the right and authority of CLC to intervene upon the default of appropriate maintenance. With regard to Parcels "A" and "B," Block A, Plat One, the obligation to maintain, and conserve will be directly that of CLC which must budget for and fund from its membership the cost of this conservation. Historic District Commission approval must be obtained for any exterior alterations to any of the above-referenced improvements. In addition, CLC must establish a "replacement reserve fund" the purpose of which will be the continuing maintenance of these Parcels. Lot 28, Block A, Plat One (the "Little Lodge", "Ice House" and "Stable") are all required to be maintained by the owner of Lot 28. The owner of Lot 13, Block A, Plat Two, must maintain the "Barn." The private driveway running from Bullard's Circle to the Main Lodge will be maintained to the extent of 7/8ths by the Council of Unit Owners and 1/8th by the owners of Lot 28 (the "Little Lodge," "Stable" and "Ice House"). The owners of Lot 13 and Parcel "J" must maintain their respective properties consistent with the use restrictions contained in Article II, Section 11 of this Declaration.

6. 4 (b) **"Public Pedestrian Access"—the "Peripatetic Easement."** All of Parcels A and B are declared to be subject to an easement in gross to the benefit of the CLC membership and the public for the purpose of passive uses only. For purposes of this Section, the term "passive use" is intended to mean only those recreational uses that entail walking, strolling, jogging, running among, as well as resting and admiring the flora of Parcels A and B, the care and preservation of which are of particular concern to the City and CLC. "Passive use" may not be deemed to include any activity employing permanently installed equipment or wheeled devices, other than those used exclusively on paved surfaces, but not to

367 exclude baby strollers or carriages or wheel-chairs or other conveyances of the handicapped. Further, a "passive use" will not be deemed to include any organized sports or scheduled events or any other use which is inconsistent with or in any manner threatens or endangers the flora of either Parcels A or B, consistent with the City's prior determination that Parcels A and B are to be maintained and used consistently with their historic condition.

7. **6(b) "Tree Management and Protection."** As a condition of development of Chestnut Lodge, the Declarant will have executed and recorded, as appropriate, a "Forest and Tree Conservation Maintenance Agreement" in the form attached as **Exhibit G**, and a "Forest and Tree Conservation Easement and Declaration of Covenant," in the form attached as **Exhibit H**, pursuant to a Forest Conservation Plan approved by the City in accordance with the Forest and Tree Preservation Ordinance of the City of Rockville ("FTPO"). Said Forest and Tree Conservation Easement will be placed across Parcels A, B, and I and Lots 4 and 28, all in Block A, Plat One, and across such other portions of the Property as may be required by the approved Forest Conservation Plan. In addition, the Declarant, and thereafter CLC must periodically prepare, and submit for approval by the City, a comprehensive tree maintenance and landscape maintenance plan providing for the protection, preservation, maintenance, and replacement of mature trees and landscaping within the West Montgomery Avenue Historic District portion of the Chestnut Lodge Development (Parcels A, B, I, and Lots 4 and 28). The requirements for the maintenance plan are set forth in **Exhibit H-1**, and include, among other things, a three-year work program and a budget for the maintenance of the trees and landscaping. The regular, periodic maintenance and potential replacement of these trees will be anticipated in the replacement reserves established for those projects which normally do not fall under an annual maintenance requirement. In addition to the foregoing mandates, all State County and City laws and ordinances pertaining to the preservation and conservation of trees will be deemed to bind the Property and the above-referenced parcels.

8. **9 (a,b,c) "Landscape Buffers" and Easements; Fences.** That portion of the Property and each and every Lot subdivided therein which is within the "Rose Hill Landscape Buffer," as depicted on **Exhibit F** or the "Thirty Oaks Landscape Buffer," as depicted on **Exhibit G** (being portions of Lots 1, Block A, Plat One; Lots 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23 and 24, Block A, Plat Two), as referenced in the above-mentioned Resolution No.3-06, are hereby declared subject to an easement to the benefit of the Declarant and CLC for initial landscape installation or other buffer restoration, and thereafter, for the care and maintenance of so much of the buffer area as lies within the easement hereby declared. The buffer and easement therefor runs to a depth of (i) ten (10) feet along

mke

368 the rear boundary of lots 8, 9, 10, 11 17, 18, 19, 20, 21, 22, 23 and 24, Block A, Plat Two; (ii) a depth of 20 (twenty) feet along the rear boundary of Lot 13, Block A, Plat Two; and (iii) a depth of 20 (twenty) feet along the boundary of Lots 14, 15, and 16, Block A, Plat Two adjacent to Autumn Wind Way. The Landscape Buffer Easements will not be deemed to prohibit the erection of fences within the easement area provided such fence complies with all applicable law and the requirements promulgated by CLC, provided, however, that no fence of any kind may be placed or erected within the areas described in Items 5 and 7, above, without the written permission of the Rockville City Forester, and where applicable, the approval of the Historic District Commission. In addition, the approved detailed application for the Chestnut Lodge development requires the CLC to maintain certain additional landscaping screening on Lots 8 through 11 and Lots 13 through 24, Block A, Plat Two, and the four (4) trees on Lot 17, Block A, Plat Two and the one (1) tree on Lot 2, Block A, Plat Two. The referenced Lots, the locale of the trees above mentioned, and other landscaping above mentioned are hereby declared to be subject to an easement to the benefit of the Declarant, and CLC to enter upon those Lots for the purpose of the care, protection and maintenance of the referenced trees and landscaping. Although CLC has the right of entry for maintenance, the owner of each Lot is responsible for keeping the area clear of trash and debris. The Buffer Areas and additional landscaping mentioned above are established for the benefit of the adjacent Rose Hill and Thirty Oaks communities and must be maintained in accordance with the landscape plan approved by the Rockville Planning Commission, as it may be amended from time to time.

9. **10.a.ii.D "Public Utility Easements"** A ten (10) foot public utility easement is hereby declared to exist upon every lot and parcel, running from its point of contiguity with and along the frontage of the public right of way depicted on the record plat for the installation and maintenance of public utilities, to include, but not be limited to, electric transformers. Sidewalks, alleys, leadwalks, storm drains and emergency access drives may be constructed within such easement, but no other non-utility improvement, other than a mail box conforming to CLC's promulgated standards, may be placed therein.

10. **10 b "Emergency Vehicle Access"** At the time of the recording of the record plat of subdivision for Chestnut Lodge, there must be thereon designated a parcel of land owned by CLC connecting Autumn Wind Way and Bullard's Circle. This parcel of land, to be identified as "Parcel F, Block A, as shown on Plat Two will be of a sufficient width to accommodate a public road and a sidewalk. Parcel F, Block A, Plat Two will be improved by the Declarant as an emergency vehicle access way and a pedestrian walkway which will be maintained by CLC. Parcel F must be conveyed to the City of Rockville upon the joint request and consent of the Rockville, CLC and the Rose Hill Homeowners Association. Parcel

mke

369 F may be conveyed to no party other than the City of Rockville, without its consent. Vehicular access to Parcel F, Block A, Plat Two must be barred by bollards of a style and placement approved by the City, to be maintained by CLC.

ATTACHMENT C

11. 10 d "Pedestrian Easement between Bullard's Circle and Thomas Street" As depicted on the above-mentioned Exhibit B, an easement to the width of six (6) feet is hereby declared for the benefit of pedestrians, both members and non-members of CLC. This easement is for the purpose of allowing a six foot pedestrian connection between Bullard's Circle and Thomas Street. This easement area will be the property of and maintained by CLC.

12. 10e. "Public Access Easements"—"PAEs" All sidewalks, alleys and pedestrian paths depicted on Exhibit A to the PRU Resolution and the plat of subdivision, are hereby declared to be subject to an easement for the benefit of members and non-members of CLC, to the extent of the "peripatetic easement" described in paragraph 6 above, and further, that the areas thus burdened by this easement will be vested in CLC subject to this easement, with the obligation to perpetually budget for and maintain those servient areas by CLC.

The easements, burdens and servitudes declared above are for the benefit of the Chestnut Lodge Community and, where appropriate, to abutting and confronting properties and to the City of Rockville, and are declared pursuant to the directives of the Mayor and Council of Rockville adopted as Conditions in Resolution No. 3-06 and must be liberally construed to serve the best interests of the members of the community and the directives of that Resolution.

The foregoing conditions, commitments, servitudes and easements are hereby declared upon the Chestnut Lodge Property and the portions thereof herein specifically identified, as covenants, conditions, easements and servitudes to bind and run with the properties herein identified in perpetuity.

SECTION TWO

DECLARATION OF COMMUNITY AGREEMENTS

In furtherance of Resolution No.3-06 the Declarant wishes to provide for the preservation of the values and amenities in the Chestnut Lodge community and for the maintenance of common areas and facilities of the community and therefore intends to subject the Property to the agreements and restrictions of this Section Two, in addition to the servitudes and easements required by the Resolution of the Mayor and Council set forth in Section One, which additional covenants are for the further benefit of the Property and its subsequent owners.

370 For the preservation of the values and amenities in the community, and as required by the Resolution of the Mayor and Council, the Declarant has determined that an association should be formed which will be empowered and delegated the duties of maintaining and administering the common areas of the 20.4 acres comprising the "Chestnut Lodge" community, and enforcing the agreements and restrictions imposed upon the lots within the community, as well the disbursement of funds and the collection of assessments hereinafter created.

The association of all of the property owners, including the council of unit owners of the condominium regime within the Property to be comprised of the condominium residences with the Lodge, is hereby declared to be a homeowners association, to be organized as a non-stock, non-profit corporation under the laws of the State of Maryland (hereinafter referred to as the "Association") for the purposes of carrying out the powers and duties described below, no part of the net income of which, if any, may inure to the benefit of any individual or entity other than the Association.

The Association is intended to be the central repository of governance and financial management for the "Chestnut Lodge" Community of lot owners and condominium owners within the Property, (collectively referred to hereafter as the "Members") and will be controlled by the covenants, conditions and restrictions of this Declaration as a part of their constituent community documents, to the end that there may be a uniform system of governance and a community-wide standard of performance and enforcement, while at the same time providing an independent, discrete organization to observe and enforce the terms of this Declaration and the covenants with Rockville.

In consideration of these additional factors, Declarant hereby declares that the real property described in Section One will hereafter be conveyed or encumbered, used, occupied and improved subject to these covenants and restrictions (hereafter sometimes referred to as "agreements") as well as to the "Conditions of Title" described in Section One hereof. These covenants and restrictions will run with and bind the land, and inure to the benefit of and be enforceable by the Declarant, its successors and assigns, and any person owning an interest in the property and improvements, including, without limitation, any person, group of persons, corporation, trust or other legal entity, or any combination thereof, who holds such interest solely as security for the performance of an obligation.

C. The capitalized words used in this Declaration are to have the meanings given to them in the "Definitions" set out in Section 3, Article VI, near end of the Declaration.

Declarant affirms that all of the Property is to be held, sold and conveyed subject to the foregoing "Conditions of Title," and subject, as well, to the following covenants, conditions, restrictions, and easements (collectively called the

mll

371“Community Agreements”). The purpose of these covenants, conditions, restrictions and easements is to provide an orderly, uniform system for the protection of the property values of the Members of the Chestnut Lodge community and the promotion of the quiet and peaceful enjoyment of the community. These covenants, conditions, restrictions and easements will run with the real property subjected to this Declaration and, in furtherance of the Resolution of the Mayor and Council of Rockville, will be binding upon all parties having any right, title, or interest in the Property or any part thereof, their heirs, successors in title, and assigns, and will inure to the benefit of each owner thereof.

Section Two

ARTICLE I

COMMUNITY AGREEMENTS, PROPERTY RIGHTS and EASEMENTS

Section 1. Owner's Easements of Enjoyment. Every Owner will have a non-exclusive right and easement of enjoyment, in common with others to the Common Areas, which are appurtenant to and will pass with the title to every Lot subject to the following provisions:

(a) the right of the Association to dedicate or transfer all or any part of the Common Area to any public agency, authority or utility for purposes consistent with the purpose of this Declaration and the achievement and implementation of the terms of Resolution 3-06, but subject to any conditions agreed to by the Association, except as limited in Section One.

(b) the right of CLC to establish uniform rules and regulations pertaining to the use of the Common Areas;

(c) the rights of CLC, the Declarant, the City of Rockville, utility companies, cable companies, and other Owners with respect to the easements established in Section One, above;

(d) the right of CLC with two-thirds (2/3) consent of each class of the Members, voting separately, to borrow money to improve the Common Area in a manner designed to promote the enjoyment and welfare of the Members and for that purpose to mortgage any of the Common Area;

(e) the right of CLC to take steps routinely necessary to protect the Common Area against mortgage default and foreclosures; provided, however, that those steps are in conformity with the other provisions of this Declaration;

(f) the right of CLC to suspend the voting rights of a member for any period during which an assessment against his Lot remains unpaid;

372

Section 2. Sidewalk and Driveway Easements. ATTACHMENT C

Every Owner has a non-exclusive right and easement of enjoyment, in common with others, to use and enjoy the sidewalks, driveways (to the extent that they or their aprons may not be upon a Lot) alleys and streets intended for common use whether located on land vested in CLC or which may be in private ownership.

Section 3. Use of Utility Easements. The rights and duties of Owners with respect to sanitary sewer and water, storm drains, cable television, electricity, gas and telephone lines, and other utilities will be governed by the following:

(a) Whenever water, sanitary sewer, storm drains, electric, gas, cable television, telephone connections or other utility lines, cables, or any portion thereof, are or have been installed within the Property, the Owner of any Lot, or CLC, may have the right, and is hereby granted an easement to the extent necessary therefor, to enter or have the utility company enter on any part of the Property in which the installations are to lie, to repair, replace, and generally maintain those installations.

(b) The rights granted in subparagraph (a) above may be used only to the extent necessary to enable the Owner or CLC serviced by that installation to achieve its full and responsible use and enjoyment. The exercise of this right constitutes the agreement of the party so acting to be responsible for restoring the surface of the easement area so used to its condition before that use, provided, however, that if the City of Rockville is required to enter upon the Property for maintenance it will only restore the Property to grade and replace concrete sidewalks and will not replace brick sidewalks or upgraded improvements that have required removal to access the City-owned utility.

Section 4. Easements on Common Areas; Appurtenant Easements on Abutting Lots. Rockville is the dominant tenant of an easement traversing all of the Common Area for the ingress, egress and construction space for the installation and maintenance of water and sewer service to the Owners.

Section 5. Easements to Community Association for Driveway, Sidewalk and Retaining Wall Installation and Maintenance. Each Lot in the Community is subject to an easement to the benefit of the Declarant, during the period of construction, and thereafter to CLC, for the installation and maintenance of driveways, sidewalks and, where indicated, retaining walls, and driveway aprons; the maintenance of alleys, sidewalks and, where indicated, retaining walls, is an obligation and expense of CLC.

Section 6. Easements to Community Association for Installation of Street Lighting. All streets within the Community are illuminated by lights provided and installed at Declarant's expense, of a style and design approved by the City of

373 Rockville, to be maintained and relamped when and as needed by the City, and energized at the expense of the City. ATTACHMENT C

Section 7. Easements for the Installation of Storm Drains and Structures. Each Lot within the Community, as well as all parcels vested in CLC, is subject to easements for the installation and maintenance of such storm drainage pipes of onsite systems and structures, to include, where necessary, dry wells. The maintenance and restoration of such pipes, systems and structures is the responsibility of CLC.

Section 8. Surface Water Easements; Swales. Each Lot within the Community is subject to an easement to the benefit of abutting properties, the City of Rockville and the CLC to permit the unobstructed flow of surface waters upon and across each Lot. All swales, contours, walls or other devices employed to discipline surface waters which are a part of original construction as designed and approved are supported by this easement and must not be modified or impeded without the written approval of CLC and the City of Rockville.

Section 9. Limitations. CLC may not suspend the right of any Owner to use the Common Area for necessary, ordinary, and reasonable pedestrian ingress and egress to and from his Lot or to suspend any easement over the Common Area for storm water drainage, electrical energy, water, sanitary, sewer, natural gas, CATV or similar service, telephone service, or similar utilities and services to the Lot.

ARTICLE II

USE RESTRICTIONS

In addition to all other covenants herein, the use of the Properties and each Lot therein is subject to the following:

Section 1. Permitted Uses. The Lots may be used for residential purposes only. Uses, including "home occupations," permitted, whether by right or by special zoning approval, in the zones in which they are located, as described in the City of Rockville Zoning Ordinance, may be permitted only after application to and grant of permission therefor by the Architectural Control and Preservation Committee (hereinafter referred to as "AEPC") and as restricted by this Declaration and any amendments thereto. Nothing contained in this Article or elsewhere in this Declaration may be construed to prohibit the Declarant, or its designee, from the use of any Lot or dwelling or improvement thereon for promotional or display purposes or as "model homes" or as a sales or construction office, or the like.

Section 2. Signage. No sign or billboard of any kind may be displayed to public view on any portion of the Properties or any Lot, except for a non-

374 illuminated sign of not more than four (4) square feet advertising the parcel of land for sale or rent, provided however, that signs used by Declarant, or its designee, to advertise the Properties or any Lot during the construction and initial sales period are permissible and are exempt from this restriction. All permanent community identification signs, directional signs, historic plaques, traffic control signs and public safety postings, erected by Declarant, or its designee are permissible and are also exempt from this restriction, but are otherwise subject to all applicable City of Rockville ordinances.

Section 3. No Interference with Quiet Enjoyment. No noxious or offensive activity may be allowed on any Lot or within any dwelling or any other part of the Community, nor may anything be done therein or thereon which may be or become an annoyance or nuisance to the neighborhood or other residents. Without limiting the generality of the foregoing, no speaker, horn, whistle, siren, bell, amplifier or other sound device, except such devices as may be exclusively for security purposes, may be located, installed or maintained upon the exterior of any dwelling or upon the exterior of any other improvements constructed upon any Lot.

Section 4. Prohibited Structures and Vehicles. No automobiles, trucks under three-fourth (3/4) ton, vans or any other vehicles or equipment of a similar nature may be allowed on any Lot or portion of the Common Area unless they display a valid current license or registration, or are stored in a garage and out of public view. Such vehicles must be parked on asphalt and may not be parked on grass areas. In addition, no such vehicle may be parked on the streets of the Properties for a continuous or intermittent period to exceed twenty-four (24) hours. No boats, recreational vehicles, trucks over two (2) tons, buses, tractors, trailers or similar vehicles are permitted to be parked on any Lot or any streets of the Properties with or without a current registration or license, except for vehicles that any builder may require to be located during the construction and sales period. This restriction does not apply to moving vans, delivery trucks, service vehicles and maintenance vehicles parked on a Lot or street for a temporary period not to exceed twenty-four (24) hours. Boats, recreational vehicles and trucks exceeding three-fourths (3/4) ton are allowed only if parked inside a garage or out of public view. The Association has the right to tow and remove from the Property (at the expense of the Owner of the vehicle) any vehicle in violation of this Declaration or any adopted Rules and Regulations.

Section 5. Animals. The maintenance, keeping, boarding or raising of animals, livestock, or poultry of any kind, regardless of number, is hereby prohibited on any Lot or within any dwelling unit, or other part of the Community, except that this will not prohibit the keeping of not more than a reasonable number of domestic pets provided such domestic pets are not kept, bred or maintained for

mke

375 commercial purposes and, provided further, that such domestic pets are not a source of annoyance or nuisance to the Community or other residents. The Board of Directors of the AEPC, has the authority, after a hearing, to determine whether a particular pet is a nuisance or a source of annoyance to the Community or other residents, and their determination is conclusive. Pets must be attended at all times and must be registered, licensed and inoculated as may from time to time be required by law. Pets are not permitted upon the Common Area unless accompanied by a responsible person and unless they are carried or leashed. The person accompanying any pet is responsible for the removal or disposal of any solid waste products deposited by the pet on the Property.

Section 6. Trash Removal. All rubbish, trash, and garbage must be regularly removed from the Property and may not be allowed to accumulate nor may it be burned on any Property. No rubbish, trash or garbage may be kept or placed outside of any dwelling on the Property except that covered trash containers may be placed in front of a Lot for pick-up if so placed not earlier than dusk on the evening preceding the day assigned for pick-up. All refuse containers, wood piles, storage areas, and machinery and equipment must be stored in the rear yard of any Lot, in a neat and orderly fashion and screened from public view. The bylaws of the condominium regime must provide for trash pickup from the condominium and for the maintenance of receptacles therefor screened from public view.

Section 7. Antennae, Garages, Clothes Lines and Fences

(a) No antennas, satellite dishes or similar transmitting or receiving devices or appliances are permitted on the exterior of any building in a manner such that they may be seen from the street, or on or above the ground surface Lot area of any Lot, without the prior approval of the AEPC. Lot owners are encouraged to place such devices inside their attics or attached to the house in a manner not visible from the street.

(b) Garages may not be converted into living space and are subject to the general restriction imposed in Section One, above.

(c) No clothing or any other household laundry may be hung in the open to dry on any Lot.

(d) No fence of any kind may be constructed within the Property except following application to and permission granted by the AEPC and any other agency or commission having jurisdiction thereof, provided that such fence is made of wood, not higher than six feet, with the top twelve inches being either scalloped or of lattice design, but under no circumstance may a fence be permitted in the front yard of a Lot.

376

ATTACHMENT C
Section 8. Tree Removal. Subject always to the conservation provisions set out in "Section One, Required Conditions of Title" above, trees may be removed from a Lot where reasonably necessary for the construction of driveways, paths, utility lines and structures, but in order to preserve the scenic beauty of the Property, except for those purposes, no tree larger than four (4) inches in diameter (measured two feet above the ground) or more than twenty (20) feet in height may be removed from the Property or destroyed without the written approval of the AEPC. This permission is not required for removal of dead trees or deadfalls. Tree removal from property owned by the CLC is also subject to the provisions of City law pertaining to the removal of individual trees from private property.

Section 9. Vegetable Gardens. Vegetable gardens must not be maintained in the front yard of any Lot and must be kept in a neat and attractive manner, screened from public view. Provided, however, if a Lot does not have a "rear" yard, such gardens may be maintained in an area of the Lot approved by AEPC.

Section 10. Prohibited Dwellings, Structures and Equipment. No trailer, unlicensed vehicle, shack, or garage may be erected or allowed to remain on any Lot; nor may any structure of a temporary character be used as a dwelling. The AEPC may allow an accessory structure upon application and review, as provided above.

Section 11. Obstructions. No tree, hedge, fence or other landscape feature may be planted or maintained in a location which obstructs sight-lines for vehicular traffic on public streets or on private streets and roadways. In order to preserve the historic orientation of the Rose Hill Barn to the Rose Hill Mansion, and the view thereof from Autumn Wind Way, no structure, other improvement or planting may be placed on Parcel J, Block A, Plat Two or on Lot 13 Block A, Plat Two between the Barn and the Lot line shared with Parcel J, Block A, Plat Two, without the prior approval of the Rockville Historic District Commission.

Section 12. Exterior Installations. No water pipe, sewer pipe, gas pipe, drainage pipe, television cable or other similar transmission line may be installed or maintained on any Lot above the surface of the ground and no wire, cable or other similar transmission line may be attached to the exterior of any structure on any Lot.

Section 13. Interference with Easements. No structure, planting or other material may be placed or permitted to remain on any Lot which may damage or interfere with any easement for the installation or maintenance of utilities, or which may unreasonably change, obstruct or retard direction or flow of any drainage

mbl

377 channels. The easement area on each Lot must be maintained continuously by the Owner of the Lot, except for those improvements in the easement areas for which a public authority or utility company is responsible for maintaining.

ATTACHMENT C

Section 14. Motorized Vehicles. No motorized vehicles, including motorcycles, motorbikes, or go-carts, are permitted on any pathways or trails within the Common Area; further, as provided in Section One, certain areas of the Common Areas are subject to the limitations of the Peripatetic Easement.

Section 15. Window Treatment. Bed sheets, plastic sheets, newspapers, or other similar window treatments may not be hung or placed in or on any window within any dwelling unit.

Section 16. Play Equipment. No play equipment, including, without limitation, basketball backboards, basketball hoops and other equipment associated with either adult or juvenile recreation, may be erected upon a Lot or attached in any manner to a dwelling unit without the prior approval of the AEPC and if approved, may not under any circumstance be installed in the front yard of the home.

Section 17. Lawn Furniture. Lawn furniture may not be used in front of the front plane of a dwelling except that it may be used on front porches or in the side and rear yards of Lots, unless otherwise approved by the AEPC.

Section 18. Rules and Regulations. All Owners and occupants must abide by the terms of this Declaration and any rules and regulations adopted by AEPC in the aid of the administration and enforcement of the terms of this Declaration.

Section 19. Lease Agreements. Any lease agreement between a Lot Owner and a lessee must provide that the terms of the lease are subject in all respects to the provisions of this Declaration and any rules and regulations, as above mentioned, and any failure by the lessee to comply with them will be a default under the lease. All leases must be in writing and AEPC must be provided with a copy thereof.

ARTICLE III

ENFORCEMENT—GENERAL AUTHORITY.

The Board of Directors has the authority and standing, on behalf of the Association, to enforce decisions made pursuant to the provisions of this Article, by action brought in the Circuit Court for Montgomery County, Maryland, whether

mke

378 those decisions are of the Board of Directors of its designee, the AEPC. This Article may not be amended without the Declarant's written consent, so long as the Declarant owns any of the property described in Exhibit "A".

ARTICLE IV

NO PARTITION

Except as permitted in this Declaration, there must be no physical partition of the Common Area or any part of it, nor may any person acquiring any interest in any portion of the Properties seek a judicial partition unless the Properties have been removed from the provisions of this Declaration. No Owner may seek to subdivide a Lot.

ARTICLE V

CONDEMNATION

Section 1. Notice of Condemnation. If all or any part of the Common Area is sought to be taken by any authority having the power of condemnation or eminent domain (or conveyed in lieu of or under threat of condemnation), each Owner is entitled to notice thereof.

Section 2. Disbursement of Condemnation Proceeds. The award made for the taking will be payable to the Association as Trustee for all Owners to be disbursed as follows:

(a) If the taking involves a portion of the Common Area on which improvements have been constructed, then, unless within sixty (60) days after such taking the Declarant and at least seventy-five percent (75%) of the Class "A" Members of the Association otherwise agree, the Association must promptly restore or replace the improvements taken on the remaining land included in the Common Area to the extent lands are available therefor, in accordance with plans approved by the Board of Directors. If improvements are to be repaired or restored, the above provisions in Article VI hereof regarding the disbursement of funds in respect of casualty damage or destruction which is to be repaired will apply.

(b) If the taking does not involve any improvements on the Common Area, or if there is a decision made not to repair or restore, or if there are net funds remaining after any such restoration or replacement is completed, then, the award

379 or net funds will be disbursed to the Association and used as the Board of Directors determines.

ATTACHMENT C

ARTICLE VI

ASSESSMENTS

Section 1. Creation of Assessments and Personal Obligation of Owners. The Owner of any Lot by acceptance of a deed therefor, whether or not it is expressed in that deed, except for the Declarant, is deemed to agree to pay the CLC a Community Assessment, which includes, in addition to the Initial Assessment to be paid by each Member at closing on the initial sale of each Lot: (i) annual assessments or charges; and (ii) special assessments. Notwithstanding the foregoing, Peerless Rockville Historic Preservation, Ltd., as owner of "Frieda's Cottage," will not be subject to Community Assessments for so long as it maintains Frieda's Cottage and Lot 4, Block A, Plat One, and the trees and plants thereon, at the same level of care as maintained by CLC for the non-exempt Lots. Failure to maintain that level of care will result in CLC undertaking the required maintenance and Peerless becoming liable for the cost thereof.

Section 2. Purpose of Assessments. The assessments levied by the CLC will be used exclusively to promote the recreation, health, safety, and welfare of the residents in the Property and for the improvement and maintenance of the Common Area, including any storm water management facilities, entryway features, walls, landscape buffer areas, lawn and landscape areas, landscaping, sidewalks, driveway aprons and crosswalks, the payment of real estate taxes and assessments, utility services for the Common Area, and management fees, administration expenses, hazard and general public liability insurance and all other costs and expenses incurred by the CLC in the proper conduct of its activities, including without limitation, charges accruing under any cross-easement or reciprocal easement agreements. In addition to the foregoing, the CLC will incorporate in those assessments such sums as are reasonably foreseen as needed to fund the CLC's discharge of its responsibilities upon individual Lots, as opposed to expenditures made for common areas vested in CLC.

Section 3. Creation of Lien for Easements. The Community Assessment together with interest, costs, and reasonable attorneys' fees, are a charge on a Lot, and a continuing lien upon the property against which each such assessment is made; provided, however, that the provisions of the Maryland Contract Lien Act (Section 14-201, et seq., Real Property Article, Maryland Annotated Code) will, if applicable, govern the establishment and enforcement of that lien. Attorneys' fees incurred in the enforcement effort are also the personal obligation of the person

mkl

380 who was the Owner of the Lot when the assessments fell due. The personal obligation for delinquent assessments will not pass to his successors in title unless expressly assumed by them. ATTACHMENT G

Section 4. Community Assessment. Each Owner of a Lot is deemed to agree to pay the Community Assessment which must be levied equitably among all the Lots within the CLC except those owned by the Declarant and will be to fund those basic expenses determined by the Board of Directors to be for the benefit of all Lots.

Section 5. Annual Community Assessment.

(a) Until January 1 of the year immediately following the taking of possession and full occupancy pursuant to a duly issued occupancy permit of a Lot and its improvements by the Owner thereof: the Annual Community Assessment will be \$6,708.00 per Lot. The Declarant must pay the sums directed in Section 13, below for lots which it owns. Notwithstanding the foregoing, the Declarant, its successors and assigns, must pay the full Annual Community Annual Assessment and Special Assessments for Lots owned by Declarant, its successors and assigns, upon which a dwelling unit has been completed and is occupied.

If the Annual and Special Assessments levied are insufficient in any given year to pay the expenses incurred by the CLC, Declarant agrees for the benefit of each Class "A" member to pay all those expenses incurred by the CLC but in an amount not to exceed what could be collected from those Lots which Declarant owns had they been owned by a "Class A" member.

(b) In order to create working capital for the initial operation of the CLC, the Declarant hereby establishes a one-time capital contribution required to be paid by each initial purchaser and collected upon the settlement of a completed dwelling located on any Lot. This initial capital contribution will be in the amount of \$1,500.00 and may be increased annually by the Declarant in an amount up to, but not exceeding, the prevailing consumer price index for the Washington Metropolitan Area. The funds collected as initial capital contributions may be applied to operating expenses, contingencies, or a capital asset replacement fund as the Board sees fit in its sole discretion.

Section 6. Special Assessments for Capital Improvements and Expenditures. In addition to the annual assessments authorized above, the CLC may levy a Special Assessment applicable to that year only for the purpose of defraying, in whole or in part, the cost of any construction, reconstruction, repair or replacement of a capital improvement upon the Common Area, including fixtures and personal

381 property related thereto, and to meet unforeseen or special expenditures as well as any budget deficit, provided that the special assessment has the assent of two-third (2/3) of the votes of each class of members who are voting in person or by proxy at a meeting duly called for this purpose. In addition to the foregoing, any capital expenditures or maintenance expenses required to be undertaken by CLC because of a Member-Owner's failure to properly discharge their responsibilities may be included in such special assessment.

Section 7. Notice and Quorum for any Action Authorized Under Sections 5 and 6. Written notice of any meeting called for the purpose of taking any action authorized under Section 5 or 6 must be sent to all members not less than thirty (30) days nor more than sixty (60) days in advance of the meeting. At the first such meeting called, the presence of members or of proxies entitled to cast sixty percent (60%) of all the votes of each class of membership will constitute a quorum. If the required quorum is not present, another meeting may be called subject to the same notice requirement and the required quorum at the subsequent meeting will be one-half (1/2) of the required quorum at the preceding meeting. No such subsequent meeting may be held more than sixty (60) days following the preceding meeting. Meetings may continue to be called subject to the same notice requirement until a quorum is present. At each meeting, the required quorum will be one-half (1/2) of the required quorum at the preceding meeting.

Section 8. Uniform Rate of Assessment. Annual and Special Community Assessments must be fixed at a uniform rate for all Lots not owned by Declarant and may be collected in advance at a frequency established by the Board.

Section 9. Date of Commencement of Annual Assessments: Due Dates. The annual assessments described above will start as to each Lot as of the date of the taking of possession and full occupancy pursuant to a duly issued occupancy permit of that Lot and its improvements by the Owner thereof. The first annual assessment must be adjusted on a pro-rata basis from the date of settlement and possession. The Board of Directors must fix the amount of the annual assessment against each Lot at least thirty (30) days in advance of each annual assessment period. Written notice of the annual assessment must be sent to every Owner subject thereto. The failure of the Board of Directors to fix the annual assessment thirty (30) days in advance of each annual assessment will not waive, but instead, postpone the effective date of the annual assessment. The due dates for payment will be established by the Board of Directors. Upon demand, and for a reasonable charge, the CLC will furnish a certificate signed by an officer for the CLC setting forth whether the assessments on a specified Lot have been paid. A properly executed certificate of the CLC with the status of assessments on the Lots will bind the CLC on the date of its issuance.

Section 10. Effect of Non-Payment of Assessments: Remedies of the CLC.

Any assessment not paid within thirty (30) days after the due date will bear interest from the due date until paid at the rate of eighteen percent (18%) per annum or the maximum amount permitted by law. Additionally, the entire balance of the unpaid annual assessments for the remainder of the fiscal year will also become due, payable, and collectible in the same manner as the delinquent portion of that annual assessment. The Board may also impose a "late charge," the amount of which will be determined by the Board. The CLC may bring an action of law against the Owner personally obligated to pay the same, or foreclose the lien against the Lot and improvements on it, in the manner provided by Maryland law for the foreclosure of mortgages containing a power of sale, and in either event, interest, costs, and reasonable attorneys' fees of any such action may be added to the assessment, provided, however, that the provisions of the Maryland Contract Lien Act (Section 14-201, et seq, Real Property Article, Maryland Annotated Code) will, if applicable, govern the establishment and enforcement of that lien. No Owner may waive or otherwise escape liability for the assessments provided for herein by non-use of the Common Area or abandonment of his Lot. The Association may notify the holder of the first mortgage on any Lot for which any assessment becomes delinquent for more than thirty (30) days and in any other case where the owner of such Lot is in default of performance of any other obligation hereunder for more than thirty (30) days, but failure to give such notice will not affect the validity or priority of the lien for a defaulted assessment.

Upon default in the payment of any installment of any assessment, or any other installment thereof, the entire balance of said assessment may be accelerated at the option of the Board of Directors and be declared due and payable in full. Any recorded first mortgage secured on a Lot in the Property may provide that any default by the mortgagor in the payment of any assessment levied pursuant to this Declaration, or any installment thereof, will likewise be a default in such mortgage (or the indebtedness secured thereby); but failure to include such a provision in a mortgage will not affect its validity or priority and the protection extended to the holder of such mortgage (or the indebtedness secured thereby) by reason of Section 4 of this Article will not be altered, modified or diminished by reason of that failure.

Section 11. Reserves for Replacements. The CLC must establish and maintain a capital asset replacement fund for replacements of improvements to the Common Area including any storm water management facilities and community facilities, to include path lighting, screening walls and plantings, retaining walls, fences, pillars, sidewalks, cross-walks, and driveway aprons. To the extent that CLC is required to maintain capital improvements located on Lots, it must establish and fund a reserve for the replacement of those features which are on

383 Lots and not on common areas vested in CLC. The annual appropriation to this fund will be based on the replacement value of all common properties and facilities which have been placed in service and their expected life. The reserve fund may not be used to finance operating and maintenance costs. The CLC may establish other reserves for other purposes as the Board of Directors may determine are necessary or appropriate. The proportional interest of any Member in any such reserves is considered an appurtenance of his Lot and may not be separately withdrawn, assigned, or transferred or otherwise separated from the Lot to which it appertains and will be deemed to be transferred with such Lot. Declarant will provide the CLC with the schedule of estimated useful lives and bases for reserving employed by Declarant in establishing the initial budget for the CLC.

Section 12. Increase in Maximum Annual Maintenance Assessment.

(a) After the first anniversary of the first conveyance of a Lot to a Class A member, the maximum annual maintenance assessment for all Class A memberships above provided for, may be increased by the Board of Directors of the Association, without a vote of the Class A membership, by an amount not to exceed ten percent (10%) of the maximum annual assessment for the preceding year plus the amount by which any *ad valorem* real estate taxes and casualty and other insurance premiums and utility costs payable by the Association have increased over amounts payable for the same or similar items for the previous year, plus the amount by which the applicable Consumer Price Index may have increased above the level prevailing as of the date of the recording of this Declaration. The assessments may be further increased as may be dictated by the results of an annual analysis of reserve requirements conducted by the Board of Directors.

(b) After the second anniversary of the first conveyance of a Lot to a Class A member, the maximum annual maintenance assessments for all Class A memberships may be increased above that established by the preceding paragraph by a vote of the members, as hereafter provided, for the next succeeding year and, thereafter, at the end of such year, for each succeeding year. Any change made pursuant to this paragraph must have the assent of two thirds of the then Class A members of the Association and two-thirds (2/3) of the then Class B members of the Association. A meeting of the members must be duly called for this purpose.

Section 13. Assessment of Declarant and Its Successors. In consideration of its assumption of responsibility for funding any budget shortfall of CLC until the lapse of the Class B memberships, as above provided, the Declarant and its successors will be responsible for making certain payments on behalf of the CLC, but are not subject to assessment by the Association. The Declarant and its successors will, commencing as of the date of the completion of all improvements to

384 the Common Areas, pay to the Association its pro rata share of the annual sum budgeted for reserve for replacements. Until the lapse of the Class B memberships as aforesaid, Declarant and its successors will be responsible for payment of their respective pro rata shares of all actual expenses of the Association to the extent that the same are not funded by maintenance assessments paid to the Association. For the purposes hereof, the proration aforesaid will be accomplished by applying a fraction, the numerator of which is the total number of Lots owned by Declarant or any successor thereof and the denominator of which is the total number of Lots finally approved by record plat(s) in the Project.

Section 14. Exempt Property. No portion of the Common Areas or Community Facilities is subject to assessment of any kind by the Association.

ARTICLE VII

MAINTENANCE

Section 1. Association's Responsibility. The CLC will maintain and keep the Common Area and any facilities located within the Common Area, including the stormwater management facility located on Parcel C, Plat One, sidewalks, cross walks, driveway aprons, pedestrian walkways and other features and fixtures of the Common Area in good order and repair, including the care, maintenance and management of common facilities located on the Lots, such as retaining walls and the storm water management facilities (dry wells) located on residential lots, as indicated on the record plats. This obligation includes maintenance of retaining walls, the seeding and mowing of all lawns of Lots fronting on Bullard's Circle or Parcel C, and as to all others, the front yard only, as well as the pruning and cutting of all trees and shrubbery, both on the Lots and in the Common Area.

The CLC is also responsible for contributing to the private maintenance of the landscaping in and around the public stormwater management facility located within the adjacent Rose Hill Community, in accordance with the maintenance agreement between the CLC and the Rose Hill community, as set forth in the "maintenance agreement" attached as **Exhibit K**. The maintenance will be funded by the Assessments as provided above. Declarant will initially provide the CLC with a manual of instructional information (the "Community Maintenance Manual") which describes in a clear and understandable manner how complex common area facilities function and how to inspect and perform routine maintenance on them.

ARTICLE VIII**RIGHTS AND OBLIGATIONS OF THE ASSOCIATION**

Section 1. Area of Common Responsibility. The CLC, subject to the rights of the Owners set forth in this Declaration, is responsible for the effective management and control of the Common Area and all improvements thereon (including, without limitation, furnishings and equipment related thereto, private drainage facilities, (which "drainage facilities," although located upon Lots, will be considered for the purpose of their care, maintenance and repair to be "common areas," and common landscaped areas), and must keep the Common Area in good, clean, attractive, and sanitary condition, order and repair, pursuant to the terms and conditions hereof and as detailed in Article VII, Section 1, above.

Section 2. Personal Property and Real Property for Common Use. The CLC, through action of its Board of Directors, may acquire, hold, and dispose of tangible and intangible personal property and real property, subject to the requirements of this Declaration. The Board of Directors, acting on behalf of the CLC, may accept any real or personal property, leasehold, or other property interests within the Properties conveyed to it by the Declarant.

Section 3. Implied Rights. The CLC may exercise any other right or privilege given to it expressly by this Declaration and every other right or privilege reasonably to be implied from the existence of any right or privilege given to it herein or reasonably necessary to effectuate any right or privilege.

ARTICLE IX**INSURANCE AND CASUALTY LOSSES**

Section 1. Insurance. The CLC's Board of Directors, or its duly authorized agent, must obtain, maintain, and pay the premiums, as a Common Expense, for policies of insurance providing the coverage described below:

(a) Property Insurance. A policy of property insurance covering all of the Common Area (except land, foundation, excavation, and other items normally excluded from coverage) including fixtures and building service equipment, to the extent that they are a part of the Common Area of the CLC, as well as common personal property supplies. The insurance policy must afford, at a minimum, protection against loss or damage by fire and other perils normally covered by the standard extended coverage endorsement, as well as all other perils

387 which are customarily covered with respect to projects similar in construction, location, and use, including all perils normally covered by the standard "All Risk" endorsement, where such is available. Such policy must also contain or have attached the following: (1) a standard mortgage clause; (2) an Agreed Amount endorsement; (3) an Inflation Guard Endorsement, if available; and (4) a Construction Code Endorsement, if the Common Area in the CLC is subject to a construction code provision which would become operative and require changes to undamaged portions of the building(s) thereby imposing significant costs in the event of partial destruction of the property by an insured peril. The property insurance policy must be in an amount equal to one hundred percent (100%) (less a deductible deemed reasonable by the Board of Directors) of the current replacement costs of the Common Area and must name as the "insured" the CLC.

ATTACHMENT C

(b) Comprehensive General Liability Policy. The CLC must obtain and maintain a policy providing comprehensive general liability insurance coverage covering all of the Common Area, public ways, and other areas that are under the supervision of the CLC (collectively, the "Common Area") to include within the scope of such insurance agreements the discharge of any CLC obligation upon a Lot. The comprehensive general liability policy will be for an amount deemed reasonable by the Board of Directors.

(c) Blanket Fidelity Bonds. The CLC must maintain blanket fidelity bonds for all officers, directors, managers, trustees, employees, and volunteers of the CLC and all other persons handling or responsible for funds of or administered by the CLC. Where the CLC has delegated some or all of the responsibility for the handling of funds to a management agent, those bonds are required for its officers, employees, and agents handling or responsible for funds of, or administered on behalf of, the CLC. The total amount of fidelity coverage required will be based on the best business judgment of the Board.

Section 2. In no event may the insurance coverage obtained and maintained by the Board of Directors or its duly authorized agent hereunder be brought into contribution with insurance purchased by individual Owners, occupants, or their mortgagees.

Section 3. Immediately after damage or destruction by fire or other casualty to all or any part of the improvements on the Common Area, the CLC must proceed with the adjustment of all claims arising from the loss and apply the proceeds to repair and reconstruction of the damage, or may retain the proceeds for the benefit of the CLC, as it sees fit.

ARTICLE X

ARCHITECTURAL CONTROL

1. Architectural and Environmental Preservation Committee-Composition and Operation. The Architectural and Environmental Preservation Committee ("AEPC") is initially composed of three (3) persons and the following persons are designated by the Board of Directors to serve until control of the Board of Directors has been transferred:

Morton H. Levine
M. Victoria Jackson
James Flood

Following the transfer of control of the Board of Directors, the Committee will be composed of not fewer than three (3) nor more than seven (7) members, designated by the Board of Directors. These members of the Committee will have staggered terms, as the Board may assign. Until the Committee is designated, the functions of the Committee will be performed by the Board of Directors.

The affirmative vote of a majority of the members of the AEPC will be required in order to adopt or promulgate any rule or regulation, or to make any finding, determination, ruling or order, or to issue any permit, consent, authorization, approval or the like pursuant to the authority contained in this Article.

Any member of the AEPC, may at any time, resign from the AEPC upon written notice to the other members of the Committee. Vacancies on the Committee, however caused, will be filled by a majority vote of the Board of Directors within thirty (30) days of the creation of the vacancy. Any new member elected to the AEPC to fill a vacancy will serve the unexpired term of the AEPC member vacated.

2. Approvals: HDC Approvals Required. Upon approval or denial by the AEPC of any plans and specifications submitted to them, a copy thereof, as approved, will be deposited among the permanent records of the Committee and a copy noting that approval or denial, in writing, must be returned to the applicant. If the Committee fails to approve or disapprove any plans and specifications which may be submitted to it pursuant to the provisions of this Article within sixty (60) days after such plans and specifications (and all other materials and information required by the Committee) have been submitted to it in writing, then approval will not be required and this Article will be deemed to have been fully satisfied.

Other than ordinary maintenance and repairs, no exterior construction, material change, alteration, tree removal, landscaping or other exterior improvement upon Lots numbered 10, 11, 12 and 13, Block A, Plat Two, without the prior written approval of the Rockville Historic District Commission.

3. Limitations. Construction or alterations in accordance with plans and specifications approved by the AEPC must be commenced within six (6) months of the date when they are approved by the Committee (whether by affirmative action or by forbearance from action, as stated in Section 3 of this Article), and be substantially completed within six (6) months of the date of commencement, or within such other period as the Committee specifies in its approval. If construction is not commenced within the period required, the approval of the plans and specifications by the Committee will be conclusively deemed lapsed and compliance with the provisions of this Article must be undertaken over again. There must be no deviation from the plans and specifications approved by the Committee without the prior consent in writing of the Committee. Approval of any particular plans and specifications or design may not be construed as a waiver of the right of the Committee to disapprove such plans and specifications, or any elements or features thereof, in the event such plans and specifications are subsequently submitted for use in any other instance.

4. Certificate of Compliance. Upon the completion of any project done in accordance with plans and specifications approved by the Committee, the AEPC will, at the request of the owners thereof, issue a certificate of compliance which is prima facie evidence that the construction, alteration or other improvements referenced in the certificate have been approved by the AEPC and constructed or installed in compliance with the provisions of this Article and the Declaration.

5. Rules and Regulations - Architectural Control. The AEPC may adopt and promulgate rules and regulations regarding the form and content of plans and specifications to be submitted for approval and may publish and record such statements of policy, standards, guidelines and establish such criteria relative to architectural styles or details, landscaping, fences, colors, setbacks, materials or other matters relative to architectural control and the protection of the environment, as it may consider necessary or appropriate. No rules, regulations, statements, criteria or the like may be construed as a waiver of the provisions of this Article or any other provision or requirement of this Declaration. The Committee may charge and collect a reasonable fee for the examination of any plans and specifications submitted for approval pursuant to the provisions of this Article. The decisions of the AEPC are final except that any member who is aggrieved by any action or forbearance from action by the Committee (or by any policy, standards or guidelines

mle

390 established by the Committee) may appeal the decision of the AEPC to the Board of Directors and, upon the request of such member, be entitled to a hearing before the Board of Directors of the CLC. Members are cautioned to note that approval by the AEPC does not waive or eliminate the need for possible approvals by the City of Rockville.

ATTACHMENT C

ARTICLE XI

RESERVED RIGHTS AND EASEMENTS

The following easements and rights are hereby declared or reserved:

(a) As long as it owns any part of the property, Declarant reserves the right to grant easements, both temporary and permanent, to all public authorities and utility companies over any part of the Common Area, provided that none so granted is in conflict with Resolution No.3-06.

(b) There is hereby created a blanket easement on, across, over and under all of the Properties for ingress, egress, installation, replacement, repair, and maintenance of all utilities, including but not limited to water, sewer, drainage, gas, cable television, telephones, and electricity subject to an obligation on the part of the user of the easement to repair and replace the ground disturbed as near as possible to the condition that existed before the work.

(c) An easement is reserved to Declarant to enter the Common Area during the period of construction and sale of the Property and to maintain those facilities and perform the operations as in the sole opinion of Declarant may be reasonably required, convenient, or incidental to the construction and sale of residences, including without limitation, a business office, sales office, storage area, construction yards, signs, displays, and model units.

(d) Declarant also reserves the right to enter into the Common Area for the purpose of carrying out any obligations it may have or assume with respect to the curing of any defects in workmanship or materials in the Property or the improvements thereon.

(e) For a period of ten (10) years from the date of conveyance of the first Lot, the Declarant reserves a blanket easement and right on, over and under the Property, but not the obligation, to maintain and to correct drainage of surface water in order to maintain reasonable standards of health, safety, and appearance. This right expressly includes, with the approval of the City Forester, the right to cut any trees, bushes, or shrubbery, make any gradings of the soil, or to

391 take any other similar action reasonably necessary, following which the Declarant must restore the affected property to its original condition as near as practicable. The Declarant must give reasonable notice of intent to take this action to all affected Owners, unless in the opinion of the Declarant, an emergency exists which precludes notice. This right is reserved and declared subject to the understanding that it is at all time subject to and controlled by any conservation or landscaping easements required by the City, irrespective of when they may have been executed or recorded with reference to the execution and recording of this Declaration.

ARTICLE XII

CLC'S OBLIGATIONS TO THE CITY OF ROCKVILLE and ENFORCEMENT OF COVENANTS AND EASEMENT

The covenants imposed above, requiring the continued maintenance or "conservation" of treed areas and open spaces, as well as the establishment and pursuit of a tree-maintenance program with the collaboration of the City of Rockville Forester, are intended to be funded from the budget of common expenses of the CLC. The Board of Directors is required to make provision for the expenses of these conservation measures in perpetuity, unless released from those obligations by the City of Rockville.

The City of Rockville has the right to require the CLC to produce its books and records demonstrating its compliance with these conservation measures and is understood and agreed to have standing to enforce such provisions.

In addition to all other rights of enforcement of the covenants and easements created and declared by this Declaration, the City of Rockville is understood to be an interested party in the observance and enforcement of those easements and covenants and is to have the right and authority to act either alone or with any other interested party in seeking the enforcement or utilization of the covenants and easements herein granted and created. Except to the extent that they are in conflict with the provision of the Condominium Act, as detailed below, and the units created on Parcel I pursuant thereto, and to the extent described in the condominium declaration, this Declaration will bind the condominium units created on Parcel I.

The condominium regime to be declared upon Parcel I (the "Main Lodge") will be created pursuant to and controlled by the terms and provisions of the Maryland Condominium Act (§11-101, *et seq.*) of the Real Property Article of the

392 ^{ATTACHMENT C} Annotated Code of Maryland. By that statute, the interests and affairs of the condominium unit owners and the council of unit owners are subject exclusively to the terms of state law. Notwithstanding the foregoing, the conduct of the council of unit owners with respect to the terms of Resolution 3-06 is subject to the directives of that Resolution.

SECTION THREE

GOVERNANCE OF THE ASSOCIATION

ARTICLE I

MEMBERSHIP AND VOTING RIGHTS

Section 1. Membership.

(a) Every Owner must be a member of the CLC. No Owner, whether one or more persons, may have more than one membership per Lot owned. If an Owner of a Lot is more than one person or entity, the right to vote and the rights of use and enjoyment are to be as provided herein.

(b) There are two forms of membership. Class "A" Members are all Owners with the exception of the Class "B" Members, if any. Class "B" Members are to be the Declarant or any party who is designated as a successor of the Declarant in a written instrument executed by Declarant.

Section 2. Voting Rights.

(a) Class "A". Class "A" Members are entitled on all issues to one (1) vote for each Lot in which they hold the interest required for membership by Section 1 hereof. There is only one (1) vote per Lot. When more than one person or entity holds an interest in a Lot, the vote for that Lot must be exercised as those persons or entities themselves determine and advise the Secretary of the CLC before a meeting. In the absence of such advice, the vote of the Lot will be suspended if more than one person or entity seeks to exercise it.

(i) Any Owner of a Lot which is leased may, in the lease or other written instrument, assign the voting right of that Lot to the lessee, provided that a copy of the lease or other written instrument is furnished to the Secretary before any meeting.

mke

393

ATTACHMENT C

(b) Class "B". The Class "B" Member is entitled to three (3) votes for each Lot which it owns. The Class "B" membership will cease and be converted to a Class "A" membership on the happening of the earlier of the following events:

(i) when the total authorized and outstanding votes of the Class "A" Members equal the total authorized and outstanding votes of the Class "B" Members; or

(ii) ten (10) years from the date of recording this Declaration; provided, however, that if the Declarant is delayed in the improvement and development of the Property on account of a sewer, water, or building permit moratorium or any other cause or event beyond the Declarant's control, then, the aforesaid ten (10) year period will be extended by a period of time equal to the length of the delays or two (2) years, whichever is less; or

(iii) upon the surrender of the Class "B" memberships by the then-holders thereof for cancellation on the books of the CLC.

Upon the lapse or surrender of the Class "B" memberships, the Declarant will thereafter become a Class "A" Member of the CLC as to each Lot in which the Declarant then holds the interest otherwise required for such Class "A" membership.

Section 1. Selection and Number.

(a) The affairs of CLC will be managed by a Board of Directors initially consisting of not fewer than five (5) persons nor more than seven (7) who will be designated by the Declarant and who will hold office until the election of their successors at the first annual meeting of the Members of the Association.

Section 2. Powers. The Board of Directors has power to:

(a) Adopt and publish rules and regulations governing the use of the Common Area and facilities and the personal conduct of the members and their guests thereon and to establish penalties for infraction thereof consistent with this Declaration.

(b) Declare the office of a member of the Board of Directors to be vacant if that member is absent from three (3) consecutive regular meetings of the Board of Directors.

mke

394

ATTACHMENT C

(c) Employ a manager, an independent contractor, or other employees deemed necessary.

(d) To borrow funds without mortgages for purposes set forth herein, in a total aggregate amount not to exceed fifty percent (50%) of the annual assessment income of the Association. Borrowings without mortgages in excess of this amount must be approved by a majority vote of the members present at a meeting of the Association when a quorum is present.

(e) Grant all necessary easements and rights-of-way over the Common Area.

(f) Exercise for the Association all powers, duties, and authority vested in or delegated to this Association and not reserved to the membership by other provisions of this Declaration or the Articles of Incorporation.

Section 3. Duties. It is the duty of the Board of Directors to:

(a) Cause to be kept a complete record of all its acts and corporate affairs, including financial statements, and to present a statement thereof to the members at the annual meeting of the members, or at any special meeting when such statement is requested in writing by one-fourth (1/4) of the Class "A" members who are entitled to vote.

(b) Supervise all officers, agents, and employees of this Association and to see that their duties are properly performed.

(c) Cause an annual operating budget to be prepared with the assistance of the CLC accountant and managing agent, based on estimated or actual expenses so as to maintain a ten percent (10%) contingency each year and to fund a capital asset replacement fund in amounts established by the Board; to set an annual assessment sufficient to satisfy the approved budget requirements (except where the membership must set such assessment in accordance with this Declaration); and to require that such budget be reviewed for adequacy by an independent Certified Public Accountant prior to approval.

(d) Fix the amount of the Community Assessment against each Lot in advance of each annual assessment period; send written notice of each assessment to every Owner subject thereto in advance of each annual assessment period; and foreclose the lien against any property for which assessments are not paid or to bring an action at law against the Owner personally obligated to pay the same.

395

ATTACHMENT C

(e) Issue, or cause an appropriate officer to issue, on demand by any person, a certificate setting forth whether or not any assessment has been paid, and releases of liens when the assessment, interest, and reasonable attorneys' fees relating thereto have been paid. A reasonable charge may be made by the Board for the issuance of these certificates. If a certificate states an assessment has been paid, that certificate will be conclusive evidence of such payment.

(f) Procure and maintain adequate liability and hazard insurance on property owned by the Association as specified herein.

(g) Cause the Common Area and all other features and fixtures owned by the CLC to be maintained as provided herein.

(h) Grant necessary easements across the Common Areas.

(i) Retain any person, firm, entity or organization necessary to assist the Board in fulfilling its obligations and duties.

(j) Cause the books and records of the Association to be reviewed annually by an independent Certified Public Accountant in accordance with generally accepted accounting principles.

(k) Otherwise perform or cause to be performed the functions and obligations of the Board and the Association as provided for in this Declaration.

Section 4. Election and Term of Office. The term of the Directors named herein expires when their successors have been elected at the first annual meeting of members and are duly qualified. The election of Directors will be by secret written ballot. At the first annual meeting of the members, the term of office of the Director receiving the greatest number of votes will be fixed for three (3) years. The term of office of the Director receiving the second greatest number of votes will be fixed for two (2) years and the term of office of the other Director or Directors will be fixed for one (1) year. In the alternative, the membership may, by resolution duly made and adopted at the first annual meeting of members, or at any subsequent annual meeting, resolve to fix the term for each Director elected. Directors will hold office until their successors have been elected and hold their first regular meeting.

Section 5. Vacancies. Vacancies in the Board of Directors caused by any reason other than the removal of a Director by a vote of the membership or any increase in the number of Directors are to be filled by vote of the majority of the remaining Directors, even though they may constitute less than a quorum; and each person so elected will be a Director until a successor is elected by the members at

396 ATTACHMENT C
the next annual meeting to serve out the unexpired portion of the term. Vacancies in the Board of Directors caused by an increase in the number of Directors must be filled by a vote of the majority of the entire Board of Directors; and each person so elected will be a Director until a successor is elected by the members at the next annual meeting of members.

Section 6. Removal of Directors. At an annual meeting of members, or at any special meeting duly called for such purpose (but only after the lapse of all of the Class B memberships as provided above, any Director may be removed with or without cause by the affirmative vote of the majority of the votes of the members present and voting, in person or by proxy, and a successor may then and there be elected to fill the vacancy thus created. Any Director whose removal has been proposed by the members must be given an opportunity to be heard at the meeting. The term of any Director who is a Class A member of the Association and who (a) becomes more than sixty (60) days delinquent in payment of any assessments or carrying charges due CLC, or (b) is consistently absent from meetings of the Directors may be terminated by resolution of the remaining Directors and the remaining Directors will appoint his successor as provided in this Article.

Section 7. Compensation. No compensation will be paid to Directors for their services as Directors. No remuneration may be paid to any Director who is also a member for services performed by him for the Association in any other capacity unless a resolution authorizing such remuneration is adopted by the Board of Directors before such services are undertaken. Directors may be reimbursed for their actual out-of-pocket expenses necessarily incurred in connection with their services as Directors.

Section 8. Organization Meeting. The first meeting of a newly elected Board of Directors must be held within ten (10) days of election at such place as determined by the Directors at the meeting at which such Directors were elected, and no notice will required to be given to the newly elected Directors in order legally to constitute such meeting, provided a majority of the whole Board of Directors is present at such first meeting.

Section 9. Regular Meetings. Regular meetings of the Board of Directors may be held at such time and place as determined by a majority of the Directors, but at least two (2) meeting shall be held during each fiscal year. Notice of regular meetings of the Board of Directors must be given to each Director, personally or by mail, telephone or facsimile or e-mail, at least ten (10) days before the meeting.

Section 10. Special Meetings. Special meetings of the Board of Directors may be called by the President on three (3) days' notice to each Director, give

397 personally or by mail, telephone, facsimile or e-mail, **ATTACHMENT C** stating the time, place and purpose of the meeting. Special meetings of the Board of Directors may be called by the President or Secretary in the like manner and on like notice on the written request of at least one-half (1/2) of the Directors.

Section 11. Waiver of Notice. Before, at or after any meeting, any Director may, in writing, waive notice of such meeting and such waiver will be deemed equivalent to the giving of notice. Attendance by a Director at any meeting of the Board of Directors is a waiver of notice by the Director of the time, place and purpose thereof. If all the Directors are present at any meeting of the Board of Directors, no notice is required and any business may be transacted at such meeting.

Section 13. Quorum. A majority of the Directors constitutes a quorum for the transaction of business, and the acts of the majority of the Directors present at any meeting at which a quorum is present will be the acts of the Board of Directors. If less than a quorum is present, the majority of those present may adjourn the meeting from time to time. At an adjourned meeting, any business which might have been transacted at the meeting as originally called may be transacted without further notice.

Section 14. Action Without Meeting. An action of the Board of Directors required or permitted to be taken at a meeting may be taken without a meeting if all of the members of the Board individually or collectively consent in writing to such action. The written consent shall be filed with the minutes of the proceedings of the Board of Directors.

ARTICLE II

VOTING AND SELECTION OF BOARD AND OFFICERS

A. Association Membership. The Association has two classes of membership, known as "Class A" and "Class B:"

(a) A Class A membership in the Association appurtenant to each Lot subject to this Declaration. With the exception of the Declarant, every person or legal entity, or any combination thereof, who is a record owner of a fee interest in a Lot which is part of the premises described in Article II of this Declaration, or which otherwise becomes subject to the covenants set forth in this Declaration to assessment by the Association, will be a Class A member of the Association; provided, however, that the holder of an interest solely as security for the performance of an obligation may not be a Class A member by reason of that interest. Each Class A member is entitled to one (1) vote for each Lot in which the member

398 holds the interest required for Class A membership, provided, however, that the votes appurtenant to a Lot occupied by persons other than the owner thereof may be cast only by tenants of the Lot who are possessed of certificates of good standing issued by the Association and endorsed to the use of the tenant by the Member who owns the Lot. The certificate of good standing required to qualify the vote of a Lot by its tenant for consideration must be dated within ten (10) days of the date upon which it is presented and is to confirm the identity of the tenant and the Lot, certifying that there is no delinquency in the performance of the tenant under any term of the lease for the Lot.

(b) There are as many Class B memberships as there are Class A memberships in the Association. The Class B member is the Declarant, its nominee or nominees, including any builder to whom Declarant has elected to transfer Class B membership, and includes every person or legal entity, or any combination thereof, who obtains any Class B membership by specific assignment from the Declarant. Each Class B member is entitled to three (3) votes for each Class B membership which it holds. The Declarant will lose three (3) votes for each Lot conveyed to a third-party purchaser. When all Lots are conveyed to third-party purchasers who have taken possession thereof pursuant to a duly issued occupancy permit, the Class B memberships will be deemed terminated and of no further validity. Notwithstanding the foregoing, holders of Class B memberships may, at any time, exchange a Class B membership for a Class A membership and thereby assume its responsibilities and financial obligations.

B. Officers of the CLC will be elected by the Board of Directors.

Section 1. Designation. The principal officers of the CLC will be a President, a Vice President, a Secretary, and a Treasurer, all elected by the Board of Directors. Prior to the lapse of all of the Class B memberships as provided above, the officers of the Association need not be members of the Association during the period of Declarant control of the Association. Thereafter, except for the President, the officers of the Association need not be members of the Association. The Board of Directors may appoint an assistant secretary and an assistant treasurer and such other officers as in their judgment may be necessary. A person may hold more than one office but may not service concurrently as both the President and Vice President or as the President and the Secretary.

Section 2. Election of Officers. The officers of the Association shall be elected annually by the Board of Directors at the organization meeting of each new Board and shall hold office at the pleasure of the Board of Directors.

399 Section 3. Removal of Officers. **ATTACHMENT C** By the affirmative vote of a majority of the members of the Board of Directors, any officer may be removed either with or without cause, and his successor elected at any regular meeting of the Board of Directors, or at any special meeting of the Board of Directors called for such purpose.

Section 4. President. The President is the chief executive officer of the Association. She or he will preside at all meetings of the members and of the Board of Directors and will have all of the general powers and duties which are usually vested in the office of president of a corporation.

Section 5. Vice President. The Vice President will take the place of the President and perform his duties whenever the President is absent or unable to act. If neither the President nor the Vice President is able to act, the Board must appoint some other member of the Board to do so on an interim basis. The Vice President will also assist the President generally and perform such other duties as are delegated by the Board of Directors.

Section 6. Secretary. The Secretary will keep the minutes of meetings of the Board of Directors and of meetings of the members of the CLC. The Secretary will give notice of all annual and special meetings of the members of the association in conformity with the requirements of this Declaration. The Secretary has charge of the membership transfer books and of such other books and papers as the Board of Directors may direct and in general, perform all of the duties incident to the office of Secretary.

Section 7. Treasurer. The Treasurer will have responsibility for funds and securities of the Association and be responsible for keeping, or causing to be kept, full and accurate accounts of all receipts and disbursements in books belonging to the CLC. The Treasurer will be responsible for causing the deposit of all monies and other valuable effects in the name, and to the credit of the CLC in such depositories as may be designated by the Board of Directors.

ARTICLE III

MANAGEMENT

Section 1. Management Agent. The Board of Directors may employ for the CLC a professional management agent or manager (the "Management Agent") at a rate of compensation established by the Board of Directors to perform such duties and services as the Board of Directors may authorize.

400 Section 2. Duration of Management Agreement. **ATTACHMENT C** Any management agreement entered into by the CLC must provide, among other things, that the agreement may be terminated for cause by either party upon thirty (30) days' written notice thereof to the other party. The terms of any such management agreement may not exceed three (3) years; provided, however, that the terms of a management agreement may be renewable by mutual agreement of the parties for successive one (1) year periods.

Section 3. Limitation of Liability. The CLC may not be held liable for any failure of any services to be obtained by the CLC or paid for out of the Common Expense funds, or for injury or damage to person or property caused by the elements or resulting from water which may leak or flow from any portion of the Common Area or community facilities, or from any wire, pipe, drain, conduit, or the like. The CLC will not be liable to any member for loss or damage, by theft or otherwise, or articles which may be stored upon the Common Area or community facilities. No diminution or abatement of assessments, as herein elsewhere provided for, may be claimed or allowed for inconvenience or discomfort arising from the making of repairs or improvements to the Common Area or community facilities or from any action taken by the CLC to comply with any of the provisions of this Declaration or with any law or ordinance or with the order or directive of any municipal or other governmental authority. Nothing in this Section 3 may be construed or interpreted to forgive or exempt the CLC from any obligation or responsibility otherwise imposed upon it by Resolution 3-06 or by any other law or ordinance.

ARTICLE IV

DECLARANT'S RIGHTS

Any or all of the special rights and obligations of the Declarant may be transferred to other persons or entities, provided that no such transfer will be effective unless it is in a written instrument signed by the Declarant.

ARTICLE V

GENERAL PROVISIONS

Section 1. Term. Unless otherwise stated, or from the context or application otherwise made clear, all easements declared herein will be considered perpetual; the covenants and restrictions of this Declaration will run with and bind the Properties and inure to the benefit of and be enforceable by the CLC and the

ATTACHMENT C
401 Owners of the Lots, their respective legal representatives, heirs, successors, and assigns, and where appropriate, by the City of Rockville in perpetuity.

Section 2. Amendments. As long as there is a Class B membership, the Declarant reserves the unilateral right to amend the Declaration. Thereafter, and except as otherwise provided herein, this Declaration may be amended during the first thirty (30) year period by an instrument signed by not less than seventy-five percent (75%) of the Lots, and thereafter by an instrument signed by the Owners of not less than a majority of the Lots. Any amendment must be recorded.

Section 3. Indemnification. The CLC will indemnify every officer and director against any and all expenses, including counsel fees, reasonably incurred by or imposed upon any officer or director in connection with any action, suit, or other proceeding (including settlement of any suit or proceeding, if approved by the then Board of Directors), to which he or she may be a party by reason of being or having been an officer or director. The officers and directors will not be liable for any mistake of judgment, negligent or otherwise, except for their own individual willful misfeasance, malfeasance, misconduct, or bad faith. The officers and directors will have no personal liability with respect to any contract or other commitment made by them, in good faith, on behalf of the CLC (except to the extent that such officers or directors may also be Owners), and the CLC will indemnify and forever hold each such officer and director free and harmless against any and all liability to others on account of any contract or commitment. Any right to indemnification provided must not be exclusive of any other rights to which any officer or director, or former officer or director, may be entitled. The CLC must, as a Common Expense, maintain adequate general liability and officers' and directors' liability insurance to fund this obligation, if that insurance is reasonably available.

Section 4. Enforcement. The CLC, or any Owner, and the City of Rockville where appropriate, has the right to enforce, by any proceeding at law or in equity, all restrictions, conditions, covenants, reservations, liens, and charges now or later imposed by this Declaration. If the CLC prevails in a Court of law, all costs or expenses incurred by the CLC in the enforcement proceedings, including attorney's fees, will become a lien on the Lot and may be enforced in the same manner as an assessment levied in accordance with Article III of this Declaration. Failure by the CLC or by an Owner or the City of Rockville to enforce any covenant or restriction herein contained will in no event be deemed a waiver of the right to do so thereafter.

402

ATTACHMENT C

Section 5. Severability. Invalidation of any one of these covenants or restrictions by judgment or court order will in no way affect any other provisions which will remain in full force and effect.

Section 6. Taxes and Assessments. The interest of each Owner to use and enjoy the Common Area is an interest in real property appurtenant to each Lot, the value of which right or interest in the Common Area will be included in the assessment of each Lot and as a result, any assessment directly against the Common Area should be of a nominal nature reflecting that its full value has been included in the several assessments of the various Lots.

ARTICLE VI

DEFINITIONS

Section 1. "Association" or "CLC" means The Chestnut Lodge Community Association, Inc, a Maryland non-profit, unincorporated association, and its successors and assigns.

Section 2. "AEPC" means the Architectural and Environmental Protection Committee.

Section 3. "Common Area" is the real and personal property now or hereafter owned or leased by the CLC or otherwise held for the common use and enjoyment of the owners. The Common Areas and Facilities must ultimately include all of the real property and all facilities depicted as such on any and all project plans, preliminary plans, and/or site plans ("Regulatory Plans") reviewed and approved by the planning authorities of the City of Rockville ("Planning Board"). Facilities include, as may be applicable, all recreational facilities, stormwater management facilities, private roads, and other required features that are to be constructed on Common Areas or on private Lots, pursuant to the Regulatory Plans. Facilities are to be timely constructed in a good, workmanlike manner.

Section 3. "Common Expenses" are all of the actual and estimated expenses incurred by the Association in connection with the use, maintenance, and operation of the Common Area, and to the extent hereby required, community facilities upon private Lots, and operation of the Association. Common Expenses include amounts necessary to establish and maintain any reserve fund determined to be necessary by the Board of Directors.

403 Section 5. "Community Agreements" are those covenants, easements, restrictions and controls imposed by this Declaration for the benefit of the Owners of all of the Lots.

Section 6. "Community Assessment" means those assessments that are levied equally against all Lots within the Properties not owned by Declarant to cover the basic expenses for services and facilities that benefit all Members and all Lots.

Section 7. "Declarant" is, collectively, Chestnut Lodge Properties, Inc., a Maryland corporation and Thomas Road, LLC, a Maryland limited liability company and their successors and assigns to whom any or all of the special rights, reservations, easements, interests, exemptions, privileges and powers of the Declarant are specifically assigned or transferred in writing.

Section 8. "Lot" means a plot of land (with the exception of the Common Area), regardless of the size, shown upon any recorded subdivision plat of the Properties, on which is intended to be constructed a residence; "Lot" will be deemed to include a condominium unit, unless it is otherwise clear from the context that a "condominium unit" not be understood as included.

Section 9. "Member" means a person or entity entitled to membership in the Association, as provided herein.

Section 10. "Owner" means one or more persons or entities who hold the record title to any Lot but does not include a party holding an interest merely as security for the performance of an obligation.

Section 11. "Person" means a natural person, a corporation, a partnership, trustee, or other legal entity.

Section 12. "Property" or "Properties" is the real property described in Exhibit "A" attached hereto.

ARTICLE VII

SCHEDULE OF ATTACHED EXHIBITS

The following Exhibits are attached and to be considered a part hereof:

- A: Legal Description of the Property --- referenced on Page 1
- B: Park Parcels Page 3
- C: Rose Hill Mansion Area Page 3

mke

- 404 D: Parcel C Park Area- SWM Easement and Agreement ATTACHMENT C Page 3
- E: Rose Hill Landscape Buffer Page 5
- F: Thirty Oaks Landscape Buffer Page 5
- G: Forest & Tree Conservation Management Agreement Page 5
- H: Forest & Tree Conservation Covenant Page 5
- I: Preliminary Budget
- J: Conversion Table, showing lot numbering as recited in Resolution 3-06, converted to record plat references
- K: SWM Management Ag, Easement and Retrofit Page 22
- L: Consents of Trustees to Declaration of Covenants and All Exhibits

IN WITNESS WHEREOF, CHESTNUT LODGE PROPERTIES, INC., and THOMAS ROAD LLC have caused this Declaration to be executed and acknowledged by its President and Managing Member, Morton H. Levine:

CHESTNUT LODGE PROPERTIES, INC.

By: Morton H. Levine
Morton H. Levine, President

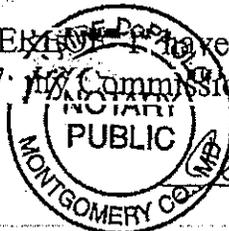
THOMAS ROAD LLC

By: Morton H. Levine
Morton H. Levine, Managing Member

STATE OF MARYLAND, COUNTY OF MONTGOMERY:

I HEREBY CERTIFY that before the undersigned Notary Public personally appeared the above-signing Morton H. Levine, who made oath in due form of law that he executed the foregoing as his act and deed, for the purposes therein set forth.

IN WITNESS WHEREOF, I have set my hand and notarial seal this 10th day of May, 2007. My Commission expires 7/1/07

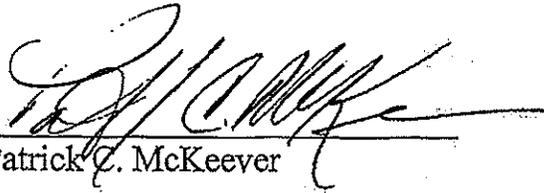


Chaire D. Parlo
Notary Public

My comm. exp. July 1, 2007

mke

405 I HEREBY CERTIFY that the foregoing Declaration of Covenants and Conditions was prepared by the undersigned, a member in good standing of the bar of the Court of Appeals of Maryland.


Patrick C. McKeever

mke

