



December 21, 2016

Mr. Tim Sheckler  
Director, Real Property Utilization and Disposal Division (WPTZ)  
Public Buildings Service, U.S. General Services Administration  
*Via email to [tim.sheckler@gsa.gov](mailto:tim.sheckler@gsa.gov)*

Dear Mr. Sheckler:

Representatives of some bidders in the Cotton Annex disposal auction have asked the State Historic Preservation Office for a clarification of historic preservation expectations under the terms of GSA's historic preservation conditions on the disposal. We would appreciate your making this response available to all bidders.

The specific question is whether the preservation covenants requiring adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Rehabilitating Historic Buildings would permit partial or complete demolition of the warehouse section of the building.

The SHPO believes that demolition of the warehouse section would not be consistent with the preservation covenants. Alteration of the warehouse section would be permissible to the extent consistent with the cited standards and guidelines.

This conclusion is based on the following considerations:

1. The reasons for significance of the property are in part historical, relating to the work of the Bureau of Agricultural Economics. The summary statement of historical significance in the National Register listing is:

The Cotton Annex possesses national significance under Criterion A in the areas of agriculture and commerce as the building within which the BAE developed the processes for cotton classification and standardization. The building was erected specifically to aid in the classification and standardization of cotton, a system that continues to serve as the basis for the valuation and utilization of cotton bales within the United States.

Since the actual process of examining cotton for classification occurred in the warehouse section of the building, that section is fundamental to conveying the building's national historic significance.

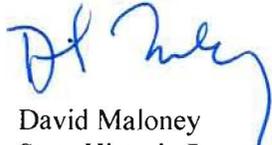
2. The Treatment Zone diagrams in the Cultural Resources Report on GSA's website show the exterior walls of the warehouse section in Zone 2 (Rehabilitation). Demolition is not an appropriate treatment under that classification.



3. The Original Site Plan drawing on page 17 of the Floor Plans and Building Drawings section of GSA's website helps to convey the architect's conception of the fully phased, but never implemented, original design.

4. Permissible alterations to the warehouse section could include, for example, the introduction of additional fenestration in the exterior walls, some structural changes, and some physical connection to or through the exterior walls, if consistent with the Guidelines. Further guidance on consistent alterations is available in the Guidelines under the section on New Additions to Historic Buildings, and in the sections on Alterations/Additions under various topics. For the Cotton Annex, additions and/or new construction on the property are expected as a basic premise of the development offering.

Sincerely,



David Maloney  
State Historic Preservation Officer

District of Columbia Office of Planning



January 23, 2017

Mr. Tim Sheckler  
Director, Real Property Utilization and Disposal Division (WPTZ)  
Public Buildings Service, U.S. General Services Administration  
*Via email to tim.sheckler@gsa.gov*

Dear Mr. Sheckler:

The State Historic Preservation Office has received more bidder questions about the expectations under the terms of GSA's historic preservation conditions on the disposal of the Cotton Annex. We would appreciate your making this response available to all bidders.

The questions relate to the allowable height of construction on the site, and whether there are circumstances in which the 130-foot height limit allowed by zoning would be restricted.

The SHPO can provide the following additional guidance:

1. The SHPO anticipates development that takes advantage of the maximum building height allowed by the zoning regulations and the 1910 Height of Buildings Act.
2. The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Rehabilitating Historic Buildings provide guidance on the massing and treatment of additions to historic buildings. Specific guidance on consistent additions is available in the Guidelines under the section on New Additions to Historic Buildings.
3. Existing planning studies describe the anticipated future urban context of the Cotton Annex site. The historic buildings to the west of the Annex, which are similar to the Annex in massing and height, are expected to remain, while new development to the east is anticipated to rise to the heights allowed by zoning regulations. The Annex site can be seen as a transition between those areas.
4. To meet the Standards, some transitional modulation of building height and massing is likely to be appropriate or necessary to attain a compatible relationship with the Cotton Annex. This is most applicable to construction near the Annex building along C Street to its east, and especially along 12<sup>th</sup> Street to its south. It is likely to be less important for the remainder of the site. Design strategies that visually distinguish the new construction on this remainder area, as if it were an adjacent but separate component of the urban fabric, may be helpful in creating a compatible relationship to the Annex.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Maloney'.

David Maloney, State Historic Preservation Officer

