

HARTGEN



archeological associates inc

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Subject: Beacon Lofts & Storage: application for height variance for Building 16, 39 Front Street—Tax Grid 30-6055-04-590165-00

Greetings Chairman Dunne and Members of the Board,

I have been asked by the applicant to review the application for the height variance for building 16 and to provide your board with an assessment of the suitability of the proposed taller building for its context within the National Register Eligible Grovetown Mills Factory complex, and its impacts, if any, to nearby properties and the character of the surrounding community.

I have more than 30 years' experience in working with the historic built culture of the Hudson Valley, first as a preservation architect, and, since 1999, as Senior Architectural Historian at Hartgen Archeological Associates, where I have completed more than 400 compliance-related projects. I have authored more than 80 scholarly works and two monographs on the historic architecture of the region, and sit on the boards of several preservation-related organizations. At present I am president of the Society for Preservation of Hudson Valley Vernacular Architecture, and have for the past five years chaired the Historic Review Commission of my home city of Troy, New York.

Findings

I have reviewed the proposed plans for the reconstruction and expansion of the former Building 16 of the Old Grovetown Mills, located along the Fishkill Creek in the City of Beacon, Dutchess County, and have reviewed pertinent correspondence and other supportive documents.

With respect to additions to extant historic structures, passages from two policy documents, generated by the National Park Service and the Department of the Interior respectively, are typically used as guidance.

Preservation Brief 14, New Exterior Additions to Historic Buildings, published by the National Park Service, and written by Anne E. Grimmer and Kay D. Weeks, indicates preferred treatments. With respect to rooftop additions, the Park Service recommends that these additions be not more than one story in height, and that they be set back from the primary elevation of the building, and from secondary elevations if the building is free-standing. The proposed project follows these guidelines. Although technically not an addition, since the entire building is of new construction, the use of a setback in this context is appropriate as it helps attain the objectives of the Park Service's guidance document; it permits the replacement for Building 16 to generally replicate the earlier structure's appearance, while making the building economically feasible to construct.

The Secretary of the Interior's *Standards for Rehabilitation*, which are "to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility" prescribe that "[n]ew additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

Neither of these two guiding documents limits the height of new construction relative to historic structures, indicating only that they be "compatible" in their design. The stepback of the penthouse of the reconstructed Building 16 brings the perceived height of the building close to the height of the adjacent Building 10, and the building's overall height of 66 feet is within the height envelope established by nearby Building 11 of the complex, at 67 feet. Following the advice of these guiding documents, the architect has designed the replacement structure using detailing compatible with the adjacent building (Building 10), and has differentiated the new from the old by varying the bay arrangement of the new construction by changing the spacing of the window bays so that they subdivide the elevations into groups of three windows between slightly wider brick piers. In other respects, the palette of materials and simplicity of forms used in the design of the new building replicate those already found within the mill complex, and honor the site's industrial character.

Weston Davey, Historic Site Restoration Coordinator, Division for Historic Preservation of the Office of Parks, Recreation and Historic Preservation, reviewed the project under SEQRA, and presented his findings in a letter dated 5 January 2018. In that letter, Mr. Davey found that the "proposed new construction...appears to be appropriate to the surrounding historic district." Mr. Davey, who can be presumed to have consulted the same guiding documents quoted above, made no mention of and indicated no concerns with respect to the height of the proposed replacement for Building 16, either relative to the other structures in the district, or in terms of its impact on the compatibility with the design of adjacent Building 10.

Finally, the project has received a Negative Declaration from the City Planning Board, who is acting as Lead Agency for this project. In the course of that body's review of the project, no concerns were voiced with respect to the proposed height of the structure.

Conclusion

Based upon my experience and familiarity with applicable guidelines for construction in historic contexts and an examination of the record in this matter, including the site plan and architectural drawings, the Phase 1A analysis, the SHPO letter of 5 January 2018 and the Planning Board memo to the Zoning Board dated 10 January 2018, it is my conclusion that the requested height variance for Building 16, which proposes an exterior wall height of 52 feet with a recessed fourth floor whose roof will be at 66 feet, is in keeping with the existing setting and Historic Preservation guidelines for such construction, and will not have a detrimental effect on nearby properties or the character of the neighborhood.

Regards,

A handwritten signature in black ink that reads "Walter R. Wheeler". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Walter R. Wheeler
Senior Architectural Historian