

February 16, 2022 *Via website upload*

Honorable Members of the Montgomery County Council Council Office Building 100 Maryland Avenue, 4th Floor Rockville, MD 20850

Re: Views on Silver Spring Downtown and Adjacent Communities Draft Plan

Dear Montgomery County Councilmembers:

Founded in 1982, the Art Deco Society of Washington (ADSW) is a nonprofit membership organization covering the Washington DC region, whose mission is to foster awareness of, celebrate, and preserve the architectural, decorative, industrial, and cultural arts of the Art Deco era and adjacent modern movements of the 20th Century. Architectural preservation is a strong element of our mission, and we have had many successes, including in the downtown Silver Spring area. ADSW actively led the fight to preserve and restore the Silver Theatre, now the AFI & Cultural Center, and the Shopping Center at Colesville & Georgia. We also participated in supporting the preservation of the Falkland Apartments and the Canada Dry Building. ADSW has participated from the beginning of this process and appreciates the opportunity to submit its views on the Planning Board Draft submitted to the Council (Draft Plan).

ADSW commends the staff of the Historic Preservation Office (HPO) for their meticulous research of the social history of downtown Silver Spring, and in particular its history related to racial segregation, discrimination, and the fight for civil rights. It is vital to have a complete history of historic resources, those aspects to be deplored and those to be celebrated. Their work greatly adds to our collective understanding of the true historic context of buildings and sites.

We also commend the staff's careful work and thoughtful recommendations with regard to the preservation and adaptive reuse of historic buildings. To that end, the Draft Plan states:

The community's sense of place relies upon several historic buildings such as the Silver Spring Shopping Center and Theatre, the Fillmore, Hecht's Building, Canada Dry Building, Dyers and Cleaners Building, and the North Washington Shopping Center. ... Silver Spring's historic buildings are critical to the community's character and collective memory; offer tangible connections to the past; provide opportunities for education and interpretation; and create a diversity of building types within the plan area.²

¹ Montgomery County Planning Dept., Silver Spring Downtown and Adjacent Communities Plan: Planning Board Draft (Winter 2022) [hereinafter Draft Plan], at https://montgomeryplanning.org/wp-content/uploads/2022/01/SSDAC-Planning-Board-Draft-FINAL-FOR-WEB-reduced2.pdf.

² Id. at 166.

ADSW whole-heartedly agrees with these statements. In particular, Downtown Silver Spring's rich collection of Art Deco commercial buildings does indeed provide "texture and depth to the architectural character of the plan area." We offer these comments in the hope that the Council will vote to *ensure and expand* "preservation and adaptive reuse of designated historic properties," not merely "encourage" it as per the Planning Board Draft.

Silver Theatre and Silver Spring Shopping Center

There can be no argument that the Silver Theatre and Silver Spring Shopping Center are the historic crown jewels of downtown Silver Spring, and ADSW was proud to have played a central role in ensuring their preservation and restoration. Designed by John Eberson, the Silver Spring Shopping Center stands as a rare, early example of a neighborhood "park & shop" center with parking integrated into the complex. The Streamline Moderne Theatre and the Shopping Center, *including the parking lot*, are doubly protected in that the Center is designated in the Master Plan for Historic Preservation, and the Maryland Historical Trust (MHT) holds a historic preservation easement on the property.

In 2020, the Historic Preservation Commission (HPC) and the MHT approved some substantial but "sensitively-designed" and "completely *reversible*" incursions into the parking lot (e.g., decking and outdoor tables to allow for outdoor dining, plantings, and a sculpture), temporarily eliminating nearly half of the parking spaces. There were no approved changes to the building, sidewalks, curbs, or canopy. The Draft Plan states that "[f]urther reimagining and activation of this parking lot would be appropriate and encouraged with respect to the ongoing preservation of the site." To that end, since the lot once housed a small gas station, **ADSW supports the Plan's recommendation to explore adding a one-story building to the parking lot**, as long as: it is small in size to preserve full view of the Shopping Center's architecture; its architecture is compatible with the Art Deco architecture of the Shopping Center; and the positioning of the added building "respects the relationship between the Shopping Center and streets." It would be fitting to see another small-scale business such as a small diner/coffee shop/taco stand/ice cream shop to take that place.8

ADSW is, however, concerned that several statements in the Draft Plan undermine a commitment to ensuring that the Shopping Center as a whole is adequately preserved. First, discussion of encouraging "activation" of the parking lot is emphasized over preservation-related goals, including preserving the parking lot's character-defining shape and its relationship to the building and the streets (including its access points from both Georgia Ave. and Colesville Rd.). This concern is exacerbated by Plan language that treats the Center parking lot as an appendage of Ellsworth mall: p. 32 under Parks and Public Spaces assigns to the parking lot the task of better drawing pedestrians through the lot to the Ellsworth Place pedestrian mall, and its listing on p. 33 as an "opportunity site"—referring to it as the "Parking Lot at Ellsworth Plaza" rather than

³ *Id*.

⁴ *Id*.

⁵ *Id.*, at 167.

⁶ Montgomery County Historic Preservation Commission Staff Report, re: Silver Theatre & Shopping Center, Case # 36/7-20A, at 30 (Feb. 5, 2020) (emphasis added), available at https://montgomeryplanning.org/wp-content/uploads/2020/02/I.K.-Multiple-Addresses-Silver-Spring-Staff-Report.pdf.

⁷ Draft Plan, supra n. 1, at 168.

⁸ To make this work, however, the recently added perimeter landscaping and approved dining space would need to be reconsidered to make room for such an addition, restore sufficient parking, and permit easy ingress and egress.

⁹ It is neither appropriate nor necessary for the Center lot to be assigned the task of drawing pedestrians to Ellsworth Plaza. There is already a large breezeway/pass-through leading directly from the middle of the Center to the pedestrian mall, plus existing sidewalks fanning out from both sides of the Center (from both Colesville Rd. and Georgia Ave.) leading to the breezeway, not to mention direct access from Ellsworth, one very short block south from the Georgia Ave. entryway. There is simply no need to further erode a historic resource in the name of additional, unnecessary "draws" through the Shopping Center to the mall, where there already is and will be more public space.

the "Parking Lot at the Silver Spring Shopping Center!" The inappropriate marginalizing language on pp. 32 and 33 should be stricken from the Plan.

ADSW believes it's important to preserve the parking lot: legally it is a part of the historic resource and the historic context of the Center, and its existence allows a clear view the Art Deco architecture of the Center from all vantage points. Moreover, it is also important to maintain most of the function of the lot for parking as a matter of equity; the parking's close proximity to the historic AFI Silver Theatre and Shopping Center make those two historic resources and their amenities more accessible to older residents and those with mobility-related disabilities than the further off parking garages on Wayne and Ellsworth.

Weller's Cleaners

ADSW strongly supports the Draft Plan's recommendation to amend the Master Plan for Historic Preservation to add Weller's Cleaners. The Weller's Cleaners building, with its slanted, cantilevered roof, colorful porcelain panels, glass walls, and whimsical, iconic signage with clock, make it an excellent specimen of Googie architecture, a futuristic (and still cool!) form of modern architecture especially popular in the late 1950s and 1960s. Weller's is a well-preserved¹⁰ example of this particular type of midcentury modern architecture, rare in Montgomery County, and the only such resource in the Plan area. Moreover, the building was designed by a prominent local architect, Ted Englehardt, who designed other notable, midcentury modern buildings in downtown Silver Spring. It is vital that this unique historic resource receive longwarranted protection under the Master Plan.

Garden and Mid-Rise Apartment Complex Historic District

ADSW also strongly supports the Draft Plan's proposed creation of a Garden and Mid-Rise Apartment Complex Historic District to be listed in the National Register of Historic Places. Two of the apartment complexes to be included in the proposed district are Art Deco apartments that have already been separately incorporated in the Master Plan (i.e., Montgomery Arms) or Locational Atlas (i.e., Spring Gardens Apartments), however both complexes do belong in a larger historic district that marks the significance of the Garden City movement.

ADSW also agrees with the inclusion of the south parcels of the Falkland Apartments in the proposed Historic District, but we continue to be disappointed that the north parcel of the Falklands – also developed as part of the New Deal to combine affordable housing with livable surroundings and green space – appears to be slated for high-density redevelopment in a plan that merely *strives* for, but does not *require*, "no net loss of market rate affordable housing." The County is undertaking many planning initiatives to retain and increase the supply of attainable, affordable housing with more green space, yet the Falkland Apartments are *already here*; these multifamily garden apartments remain more affordable than many of the newer high-rise apartments in downtown Silver Spring. **ADSW urges the Council to reconsider destruction of the north complex and, despite the fact it may lack the potential for historic designation on its own, to preserve Falkland North by including it in the Garden Apartments Historic District.**

Other Additions to the National Register

For some time now, ADSW has argued that midcentury modern architecture is the next frontier of historic preservation – not only as unique examples of modernist design and architecture, but also because of the stories these buildings can tell. They coincide with a formative period in the County's history as both a DC suburban bedroom community and as an identifiable community in its own right. As staff have ably

¹⁰ Clare Lise Kelly, Montgomery Modern 96 (2015).

¹¹ Draft Plan, supra n. 1, at 88 (emphasis added).

documented, this period was also a formative time in the community's and nation's history, as the civil rights and other social justice movements raged and made an impact on policies and practices.

ADSW thus supports the Draft Plan's recommendation to add the American National Bank Building, the Perpetual Building, the brutalist Montgomery Center Building, the Operations Research Inc. Building, and the other office buildings listed in the Draft Plan to the National Register. Adding these buildings to the National Register would represent a good start, but would not furnish protection from substantial alteration or demolition. The County's Locational Atlas for Historic Resources has only included piecemeal updates since its creation in 1976, during which time buildings erected in the 1950s and 1960s are now 60-70 years old and eligible for greater protection. We urge the Council to add provisions to the Draft Plan to the effect that at least some of these mid-century modern office buildings should be added to the Locational Atlas as well.

There are also many Art Deco buildings that have not yet been but should be surveyed for addition to the Locational Atlas. The old Coca-Cola Bottling building on East-West Highway (now National Tire) is already slated for demolition to build a new urban park, 12 which illustrates the importance of being proactive in designating historic resources. **ADSW urges the Council to amend the Plan to recommend that some unprotected Art Deco buildings** (e.g., Crisfield's, the old Silver Spring Tire Co./now Hertz rental cars building) be added to the list of buildings in the plan district that should be surveyed, evaluated, and placed in the Locational Atlas.

Fenton Village

During the development of the Draft Plan, Planning staff emphasized that there was strong community support for keeping Fenton Village largely as is. The community appreciates the area's history of: providing a toehold for small entrepreneurs, often recent immigrants; nurturing small businesses that serve diverse communities; and maintaining the small-scale of its older buildings and nearby street parking. For the most part, the Draft Plan evinces an intent to preserve these features, making some improvements to the streetscape and creating some green space. But, the Plan also repeatedly refers to new development in Fenton Village, especially between Georgia and Fenton, and behind Fenton, allowing changes in height and types (zoning) of developments, and eliminating parking. Such changes could easily change the character of this "much-loved" district, and should be significantly constrained.

On behalf of the Art Deco Society of Washington, thank you for the opportunity to share our views. If you have any questions, please contact me or Steve Knight, ADSW President, at president@adsw.org.

Sincerely,

Deborah Chalfie, ADSW Preservation Chair

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¹² ADSW urges the County to consider whether any part of the Coca-Cola building might be preserved and reused, for instance as a gateway into the new park. At a minimum, the building should be photographed and documented for the HPC's records.

¹³ Draft Plan, supra n. 1, at 21.