The Honorable Trayon White
Councilmember, Ward 6
Chair of the Committee on Transportation and Environment
Council of the District of Columbia
1350 Pennsylvania Avenue NW
Washington, DC 20004

October XX, 2025

Dear Councilmember Allen:

This letter is in response to your October 3, 2025, letter to Chancellor Ferebee about your concerns about the design process for the Chisholm Elementary School Modernization project. To best answer the issues you raised, this response is from both DC Public Schools (DCPS) and the Department of General Services (DGS), as we are design and construction partners for capital projects.

Background

The DCPS portfolio hosts some of the most historically significant buildings in the DC Government portfolio. Unlike private properties, by law, District owned properties require additional oversight and reviews related to historic preservation, design, and planning, based on various requirements by local and federal laws as linked below:

- Federal Preservation Laws
- Historic Landmark and Historic District Protection Act of 1978
- Executive Order 1259
- Old Georgetown Act of September 22, 1950
- 1952 National Capital Planning Act
- Home Rule Act of 1973

These local and federal laws are administered by several different agencies listed below:

- DC Historic Preservation Office (SHPO/HPO)
- Historic Preservation Review Board (HPRB)
- Commission Fine of Arts (CFA)
- Old Georgetown Board (OGB)
- National Capital Planning Commission (NCPC)

When considering a building and site for historic preservation they can fall into different categories. Based on those categories, they can have varying requirements for reviews and approvals from the agencies noted above. These reviews are better understood by each of the agencies and their oversight requirements.

Historic Preservation Office/SHPO – HPO/SHPO reviews all District owned projects for buildings that are deemed eligible for historic designation for the DC inventory. The threshold for these buildings generally starts with a construction date of 50 years or older, but other factors can play a role as well. These additional factors are

noted in the Criteria for Designating Historic Properties in the District of Columbia. In addition to this, a building located in a historic district and considered a contributing structure, as well as buildings that are already landmarked and on the DC inventory, would be reviewed with HPO. These reviews include the exterior facade of the building, the interior, and the site/landscape surrounding the building. There is a specific review process for government projects, which can be viewed in detail on HPO's website. As it relates to the DCPS portfolio, most schools are more than 50 years old, and many are deemed eligible for other considerations. HPO review and approval is required for a building permit to be issued.

Historic Preservation Review Board – HPRB is a board that reviews historic buildings that are in historic districts or already landmarked. In some situations, when determined by HPO, they may require a project be reviewed by HPRB when there is a request for work that may be considered an adverse effect to a building deemed eligible for designation that is not in a historic district. If a project is required to have an HPRB review, it must have completed approvals before it receives permit approval. Unlike other review boards, HPRB will take into account testimony from the community and the ANC as it relates to historic preservation when provided either at a hearing or in other communications. Because Chisholm ES is in a historic district, the project will be reviewed by HPRB for approval, with a recommendation from HPO staff.

Commission of Fine Arts – CFA is a federally funded board that reviews all DC projects that have an impact on the exterior design of a building. Their review is not limited to historic preservation but considers the overall design and appearance of the building and site. Chisholm ES Modernization will go to CFA for review at concept and final review.

Old Georgetown Board – OGB is a federally funded board that only reviews projects within the Georgetown Historic District, but they review all public and private projects in this district. OGB is considered the strictest of the review boards, much of that stemming from their general policies around window replacements. DCPS only has a few schools in this district that are subject to OGB review, which include: Hyde Addison Elementary School and Hardy Middle School.

National Capital Planning Commission – NCPC has two levels of oversight: advisory and approval. There is an area of DC designated the "Central Area," which NCPC has approval level oversight, while elsewhere in the district they provide advisory oversight. NCPC generally focuses on overall community and city planning features, and less on the specific design and appearance of a building. There is an opportunity for the public to provide testimony for or against a project that can be considered by the commission.

In addition to official review boards, DC has many community groups that are dedicated to historic preservation across different neighborhoods. While DGS and other developers are not required to satisfy these groups' recommendations, it is considered best practice for us to consider the communities' opinions, as they may testify against a project at a related hearing causing adverse effects to properties that are considered historic.

Approach to Historic Preservation

During the Capital Improvements Planning process, each year DGS and DCPS evaluate school modernizations to create or update existing budgets as needed. Creating a modernization budget requires an evaluation of several factors, including the education specifications, which are based on the enrollment projections; the latest construction industry trends; all local codes and current applicable laws; the building property; and the existing building condition, accounting for historic status.

The priority for DCPS modernization projects is to meet the educational specifications for that school. While solving this problem for DCPS, the architect is also required to meet all applicable laws and codes, to engage with local permitting agencies, and to obtain all necessary permits for construction.

Buildings and project sites are evaluated when developing a budget, which includes evaluating if any portion of the existing building can reasonably remain as part of the final project once the school has been modernized.

School modernizations have finite budgets and must be completed quickly as well as in a specified time, so reduced construction time is beneficial. As such, renovation of existing buildings is the preferred method pursued for modernization.

Generally, since the building is already a school, it can be modified on the interior to meet the needs of the school and the education specifications during the modernization. For example, most schools have existing cafeterias, gymnasiums, or multipurpose spaces; however, these spaces may not meet the DCPS education specifications. This has been solved through several different approaches across the modernization program, including tearing down and rebuilding, renovation and expansion, reuse for a different program, or adding a new space to meet the education specifications. In rare cases, school buildings of a particular era do not function well as a school based on current education standards and are then considered for full demolition.

In addition to building and site evaluations, local codes and laws relating to building construction, and required design approval processes are also considered when developing the budget. Requirements considered include: the net zero energy code, zoning, historic districts, stormwater management and green area ratio requirements, and design review and approval from sister DC agencies and federal agencies, including those listed above. If a building is located in one of the historic districts or was built more than 50 years ago, a building or contributing structure can be considered historically eligible. This information is also considered in the development of the budget. There have been some cases where historically eligible structures cannot meet the needs of the education specifications. These cases are addressed individually through review with the necessary agencies and approval processes for each of the projects. During both the Eaton ES Modernization and the Bancroft ES Modernization, portions of the historic building were not salvageable and did not work for the educational program. In order to meet education specifications, the team had to apply for and receive Mayor's Agent approval, which allowed for the demolition of historical portions of those buildings.

Similar to the approach to modernizations, small capital projects must also account for several factors, including historic preservation. When developing a budget request for small capital projects, historic preservation is also considered.

In recent years, DGS and DCPS have taken a clear and consistent position with all review agencies: historic preservation cannot become a burden or deterrent to the success of a project, specifically as it relates to accessibility, programmatic needs, safety, or material selection. DGS and DCPS have worked closely with HPO and other review bodies to strike a thoughtful balance – pursuing modernizations that respect and incorporate historic preservation goals when possible. This delicate balance has been carefully developed over the years, and we believe recent modernization projects demonstrate our success in creating beautiful, modern spaces that celebrate the District's rich architectural history, demonstrate our commitment to design excellence, and allow for effective educational programming for students, faculty, and the community.

Historic Preservation and Sustainability

DGS and DCPS' sustainability goals remain consistent – even when projects involve historic preservation or existing buildings. Our objective is to reduce building energy use and to meet or exceed the District's Net Zero Energy (NZE) targets whenever feasible. In recent years, including this summer, DGS successfully completed several school modernizations that met or exceed the District's NZE requirements, even for existing buildings with historic designations. Below is a list of recent modernization projects that incorporate historic preservation, while achieving or exceeding the District's NZE goals.

Schools That Incorporate Historic Preservation	NZE Targets Met
Raymond ES	on site NZE

Garfield ES	NZE ready, was before Appendix Z but low EUI (Energy Use Intensity)
Dorothy Height ES	NZE ready, was before Appendix Z but low EUI
John Francis Education Campus	NZE ready, was before Appendix Z but low EUI
Whitlock ES	NZE ready, was before Appendix Z but low EUI
Truesdell ES	On site NZE
Adams Education Campus	low EUI, no space for solar panels

The evaluation of carbon emission through the life cycle of a building, including construction, is called embodied carbon. Embodied carbon has become an increasingly discussed topic in the realm of sustainability as energy use of buildings is lowered and becomes a smaller portion of carbon emissions. DGS and our Design-Build partners take a holistic approach to meeting Net Zero Energy and broader sustainability goals, focusing on reducing both energy use and carbon emissions. Construction projects are one of the largest contributors to global embodied carbon emissions, much of which stems from the production of concrete and steel for new buildings. By preserving an existing building through renovation or adaptive reuse, emissions are reduced for its environmental impact. This inherently means that historic preservation, when executed in conjunction with other construction elements like new windows and insulation, can be better for the environment overall than all-new construction, and still meet NZE requirements

Chisholm Elementary School Modernization

As this relates specifically to the Chisholm Elementary School Modernization, during the budget analysis for the Capital Improvements Plan, it was found that the original 1948-49 building is in reasonable shape and can be kept. The 1960s single story wing, however, was found to have accessibility issues and is not structurally sound for upper-level expansion and the cost for demolition of this wing was included in the modernization budget. The existing condition study also found that the cafeteria and gymnasium do not meet the education specifications and therefore it is anticipated that these spaces are built in the new addition of the modernization. The existing gymnasium and cafeteria spaces, however, can be reused for other programmatic needs. This is an approach that has been successful in many DCPS modernizations in recent years, and DGS/DCPS worked with HPO to make programmatic changes possible, while also addressing any concerns of historic preservation throughout the design and construction process.

DGS and DCPS believe Chisholm Elementary School will be similarly successful and will address programmatic needs throughout the design process to ensure the education specifications are met. Additionally, the building was determined to be eligible for the historic inventory by HPO. While this does not mean it is required to stay, the building is also located in the Capitol Hill Historic District and therefore is required to be reviewed by HPRB. In our experience working on schools in historic districts, if the building is deemed eligible or contributing to a historic district, HPRB requires proof that the project could not be completed but for removal and demolition of the building. DGS and DCPS do not believe that argument exists at this site, as the existing building can be adapted to meet the education specifications. Additionally, the approved budget does not support a full demolition.

In response to the specific comments from CM Allen's office see responses below:

1. The existing gym structure would be forced to remain but, per DCPS's current standards, it is too small to serve as a gym, requiring a new gym to be built elsewhere on the site. Another program must then be made to work in the remaining space by maintaining the characteristics of nearly triple height ceilings. During the most recent SIT meeting, the library was proposed in that space in all three concepts presented. While it could be a striking space, it is far from the best use of that footprint, occupying significant ground floor space that could be better allocated to the preschool classrooms and even additional floors if the design were not so constrained.
    a. <u>Response:</u> If additional preschool classroom space on the ground floor is something that the school would like to consider, the design team can explore expanding the footprint of the new construction area to achieve this. It does not require tearing down the building to meet this preference. The existing gym/auditorium space is similar to other schools in the portfolio. From the floor to the bottom of the structure, the clearance is 23', which is taller than a standard classroom; it is great for a library and will allow for a dropped ceiling

and mechanical ducts without impacting the space. A similar design was executed at Truesdell Elementary School just this summer.

2. The 1949 building's L-shaped configuration means that half the current classrooms and gym have east- or west-facing windows, which suffer from glare and solar heat gain. Rather than the modernization correcting this deficiency, preserving the 1949 building maintains it, which would drive up heating and cooling costs, and despite significant energy efficiency advancements, shades will still need to be drawn. This would unnecessarily require the mechanical systems to work harder to compensate. It also limits where new classrooms can be placed on the site, forcing these to also be built in the wrong solar orientation along busy 11th Street, SE, where they will additionally bear the brunt of traffic noise and air pollution.
    a. Response: As noted above, the approach to sustainability requires a holistic approach in these designs, and while these points raise very specific concerns related to sustainability, the goals will still be met in the building by modifying the interior of the building and replacing windows to be more energy efficient. This is done through reiterative energy modeling, which is a requirement of the District's Net Zero Code. DGS has no concerns with this project being able to exceed the District's standards for Net Zero construction and meeting the goal of onsite Net Zero energy while keeping the existing building in place. As it relates to traffic and air pollution, Chisholm has a generous property compared to other school sites, but it is still located in a densely populated area; this would be a consideration for any orientation of the building.

3. Preservation would require maintaining the existing, elevated main entry at the corner of 10th and G Streets, SE. This perpetuates safety concerns, given the proximity to the intersection, and accessibility challenges for people using wheelchairs, bikes, and strollers. It also necessitates inefficient ramps inside the building to step the floor level back down to meet grade at other doors.
    a. Response: Concerns related to the entrance's accessibility and security is also a design item that can be addressed through iterative design review, if this is feedback provided from the SIT and school leadership. Moving the main entrance to accommodate those concerns has been successfully explored and implemented at many other modernizations.

Questions:

1. Has DCPS considered a complete demolition of the existing building as part of its initial design work? If so, what were the agency's conclusions and reasoning? What is the justification for preserving some or all of the existing building, and how will it impact the overall design in terms of the trade-offs I referenced above?
    a. Response: As noted above, complete demolition was not considered, as this is a historic building that is able to be adapted to meet most of the educational specifications. New wings will provide the spaces required for an elementary school. Further, as stated previously, it is not sustainable to demolish a building that is in good shape.

2. Will DCPS commit to providing designs contemplating a complete demolition of the existing building? Would that decision have any cost or project timeline implications?
    a. Response: Demolition of the building is not a consideration when the existing building with modifications can meet the educational specifications. DCPS and DGS will not commit to providing designs contemplating a complete demolition of the existing building. As noted above, it makes sense and is a good use of public resources to keep part of the existing building. Demolition of the building would delay the project by at least one year and incur significant additional costs, estimated at $20M or more. As noted above, DGS and DCPS strive to preserve portions of school buildings when possible.

Conclusion

DGS is responsible for meeting the programmatic needs of school modernizations while meeting all DC laws and codes and being good stewards of public funds. DCPS and DGS do not consider demolition of buildings unless meeting the programmatic needs of the building is unachievable or the building is in a condition where it would cost more to renovate the structure than to build new. Specific feedback from the SIT and community is considered during the design process, but the final decision on designs is determined by DCPS Facilities Planning and Design with DGS. Our schools are built not

just for the current students and staff, but for the future communities that will occupy them through the ongoing DCPS lens of targeting equity across the portfolio.

Sincerely,

Lewis D. Ferebee, Ed.D.
Chancellor, DC Public Schools

Delano Hunter
Director, Department of General Services