

July 26, 2017

Richard Griffin  
Director of Economic Development  
The City of Frederick  
101 North Court Street  
Frederick, MD 21701

Re: Downtown Frederick Hotel and Conference Center – Loans of 2016 and 2017  
200 and 212 (rear) East Patrick Street, Frederick, MD  
Historic Preservation Review – DHCD Grants and MD Capital Grants

Dear Mr. Griffin:

Thank you for your recent letter, dated June 20, 2017 and received by the Maryland Historical Trust (Trust) on June 21, 2017, regarding the above-referenced proposed undertaking.

The letter included a formal submittal for the project and provided the additional information requested in our prior letter dated February 7, 2017. Trust staff appreciated the opportunity to attend the meeting and site visit the City hosted on March 2, 2017 with involved City and state agencies and the developer (Plamondon Hospitality Partners), which provided us with a good understanding of the project need, scope, and current conditions. The project involves state grants from the Department of Housing and Community Development (DHCD) and Maryland Capital Grants / Bond Bill Loans of 2016 and 2017. Thus, the Trust carefully reviewed the City's submittal to assess the project's effects on historic and archeological properties, pursuant to the Maryland Historical Trust Act of 1985. We offer the following comments and look forward to further consultation with the City and other involved parties to successfully complete the state historic preservation review of this undertaking. It is the Trust's understanding that, as this project involves many state partners, DHCD is taking the lead for the state review and any necessary agreement documents.

**Project Description / Area of Potential Effects:** The project entails the development of the Downtown Frederick Hotel and Conference Center located on a parcel that encompasses 200 East Patrick St. and the rear portion of 212 East Patrick St. The property is located within the Frederick Historic District and is bordered by East Patrick St. on the north, South Carroll St. on the west, and the Carroll Creek Linear Park on the south. Development of the project will include construction of the new hotel and conference facility including a parking garage, adaptive reuse of the historic News Post Building / Frederick Railway Terminal Building for retail, demolition of the non-historic 1967 addition to the Press Building Addition, and demolition of the Birely Tannery building and remaining portion of the associated archeological site 18FR575. The project's area of potential effects includes the parcel slated for direct impacts for development of the hotel and conference center and related retail, as well as the immediately surrounding areas within the historic district where the project will be visible.

**Identification of Historic Properties:** The project's area of potential effects includes the following historic and archeological properties which are listed in or eligible for inclusion in the National Register of Historic Places:

- Frederick Historic District (F-3-39)

- News-Post Building (FHD-473)
- Birely Tannery Building (FHD-1303)
- Birely Tannery Archeological Site (18FR575)

It is our determination that the City of Frederick and Plamondon have made a reasonable and good faith effort to identify National Register eligible archeological resources that may be impacted by the proposed project. The Birely Tannery Archeological Site (18FR575) constitutes the sole archeological property eligible for the National Register located within the project's direct impact area.

**Trust Comments on Preliminary Plans:** The City's recent submittal included conceptual plans, elevations, and views for the new hotel and conference center and the rehabilitation of the News Post Building. It was helpful to see the concepts and renderings for the whole project to understand its compatibility within the context of the historic district and enhanced revitalization efforts within the historic downtown area. Trust staff reviewed the conceptual plans giving particular attention to the design's compatibility with the historic and architectural qualities of the Frederick Historic District and consistency with the recommended approaches for rehabilitation and new construction set forth in the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. The new construction/infill development should be clearly differentiated from the historic building yet compatible in terms of materials, relationship of solids to voids, color and scale. We offer the following initial comments on the conceptual plans and look forward to ongoing review and comment on the plans as they are further developed:

- All new construction should be compatible with the size, scale, color, material and character of the property and the neighborhood. Taking cues from the surroundings is a good way to ensure sensitive new construction in the district.
- Building height is one of the strongest design guidelines for new construction. The height of adjacent buildings will help dictate the height of new construction.
- A uniform setback of buildings as they line the street creates the "street wall" and is essential to preserving the character of the district. New construction should respect the street line created by its neighbors. The cornice line should remain relatively consistent with adjacent buildings.
- Windows and doors establish a rhythm for the street and any new construction should be harmonious with this established rhythm. Windows should be of similar size and overall placement as adjacent buildings.

**Assessment of Effects:** We acknowledge that elements of the project will have a positive preservation outcome including the adaptive reuse of the News Post building and sensitive new construction within the district. Nonetheless, the project will involve the demolition of the historic Birely Tannery Building and remaining sections of the Birely Tannery Archeological Site. Thus, it is our determination that the project will have an *adverse effect* on historic and archeological properties.

**Next Steps:** The next step in the state's historic preservation review process involves resolving the adverse effects of the undertaking on historic properties. The resolution of adverse effects entails ongoing consultation among the involved parties, with input from other consulting parties and the public, to review alternatives. If avoidance is not possible then these parties develop a Memorandum of Agreement (MOA) that specifies the agreed upon mitigation measures and process by which the project may proceed in accordance with the stipulations of the MOA, as outlined below.

1. *Continue consultation:* The City should continue consultation with the Trust, involved state agencies, Plamondon, and other consulting parties, to develop and evaluate design alternatives or modifications to the undertaking that would avoid and minimize the adverse effects. The City should involve other interested entities and the public in the process and consider the views shared by those parties in developing measures to resolve the adverse effects. We acknowledge the efforts the City and project team have taken to date to inform the public regarding planning efforts for this undertaking and seek input through the City's Historic Preservation Commission review process. We look forward to hearing the outcome of the HPC process currently underway for the project.
2. *Resolve the adverse effect:* If the City is not able to avoid the adverse effects. The City, involved state agencies, the Trust, and Plamondon will need to negotiate reasonable and meaningful measures to reduce and mitigate the adverse effect and execute a formal Memorandum of Agreement (MOA). The MOA will specify the measures that will be implemented to resolve and mitigate the adverse effect on historic and archeological properties. It will include stipulations that establish the process, timeline, and associated responsibility for fulfilling the agreed up on measures during project design and implementation. The other consulting parties and the public may have valuable input to share in this process.

It is premature for the Trust to discuss what may constitute an appropriate mitigation strategy for this project. However, given our prior experience in the development of strategies for similar types of projects, it is likely that mitigation may include but not be limited to the following items: establish the process for ongoing review and comment on the development of design plans for the rehabilitation and new construction to ensure adherence to the Secretary of the Interior's *Standards*; further research, documentation, and data recovery of the historic and archeological properties slated for impact; a robust and creative public education and interpretation effort geared to tell the story of the project area's important industrial and transportation history and its role within the district; and other meaningful measures developed as a result of the consultation process. The project's high public profile and visibility through its uses for lodging, dining, conference space, recreation, and retail provide exceptional opportunities for innovative interpretive measures.

3. *Proceed with the undertaking:* Execution of the MOA and implementation of its terms will evidence compliance with the state historic preservation review process for the City and the involved state agencies providing grant assistance to the project.

We look forward to ongoing consultation with the City, DHCD, Plamondon, and various consulting parties to successfully complete the historic preservation review of this undertaking. If you have any questions or need further assistance, please contact Beth Cole (regarding archeology and the review process) at [beth.cole@maryland.gov](mailto:beth.cole@maryland.gov) or Amanda Apple (regarding historic buildings and landscapes) at [amanda.apple@maryland.gov](mailto:amanda.apple@maryland.gov). Thank you for providing us this opportunity to comment.

Sincerely,



Elizabeth Hughes  
Director / State Historic Preservation Officer

EH/BC/ARA/201703478

cc: The Honorable Randy McClement, Mayor, The City of Frederick  
Kevin Baynes (DHCD)  
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