

**Eastern Market Community Advisory Committee**  
**Capital Improvements Subcommittee**

**Report Concerning**  
**Post-Fire Revised**  
**Concept Design Submission**

**June 11, 2007**

On May 17, 2007, the Office of Property Management (OPM) provided a memorandum identifying parameters of the restoration project that had changed due to the April 30<sup>th</sup> fire at Eastern Market. On June 28, 2007, Quinn Evans Architects (QEA) provided a Post-Fire Concept Design narrative submission to the Staff of the DC Historic Preservation Office. On May 23<sup>rd</sup>, EMCAC authorized this Subcommittee to focus its review of those design revisions on restoration of the Market, rather than the prior focus of repair/rehabilitation. This change in focus recognizes that the fire damage destroyed much of the 1974 rehabilitation work, and now EMCAC is urging the City to focus on restoration of the more architecturally significant elements of the building, the 1873 Adolf Cluss design with the 1908 Snowdon Ashford modifications. On May 4<sup>th</sup>, QEA provided drawings to EMCAC that implement the design changes required by the fire and the more ambitious restoration design. Those drawings will be the basis of the presentations that OPM and QEA will make on June 21 at the Fine Arts Commission and on May 28 to the Historic Preservation Board.

The Subcommittee is largely supportive of those concepts, but raises certain concerns that are the subject of these comments:

**Historic Preservation Considerations.** EMCAC recognizes the responsibility to comply with current ADA and building code requirements and to maintain the historic integrity to the Market, consistent with the national policy to preserve historic facilities. EMCAC has continuing concerns as to whether those competing interests are being appropriately balanced. EMCAC asks that OPM and QEA take notice that this is probably the only building in the City that has its own legislation and that § 37-111 (h)(1) of the legislation clearly states that:

Any plan for the renovation or restoration of Eastern Market and the Eastern Market Square, including the Eastern Market building or Farmers' Line shed, shall comply with the standards for rehabilitation of historic buildings issued by the U.S. Secretary of the Interior and shall include comments by the EMCAC.

Historic preservation is the only federal requirement mentioned in the Eastern Market legislation, which indicates the primacy that is to be afforded to historic preservation considerations when they compete with other requirements, such as ADA and building code requirements. Further, EMCAC is specifically named in this provision of the Eastern Market legislation, and throughout EMCAC's participation in developing the design for the restoration of the Market, EMCAC has taken into account this historic preservation requirement. Two particular instances where historic preservation consideration do not appear to have been afforded primacy over ADA or building code requirements under the present design proposal are:

(1) The proposal to use a simultaneous demand formula to compute the number of restroom fixtures that infringes on the architectural integrity of the Center Hall doorway.

(2) The proposal to intrude on historic interior merchant space with interior ramps and railings required for ADA entrances on the east façade, rather than provide improved pedestrian access to ADA entrances on the west façade that do not require such ramps and railings.

**Center Hall Doorways.** Drawings 2.1 and 3.1 of the June 4 QEA submission show the same configuration of the Center Hall that was presented at the 65% Design Submission. As expressed in EMCAC's January 16, 2007 comments, EMCAC continues to advocate that the Center Hall door opening should be configured to provide a clear and direct passageway, with double doors opening into the South Hall, aligned with the double doors proposed to open into the North Hall. EMCAC recommends the goal should be to provide double doors into both the North and South Hall that are aligned and similar in size and thereby provide a visually significant, architecturally pleasing and functional passageway between the North and South Halls.

Apparently a part of the reason for the present door opening design is the space and configuration requirement for the large number of rest room fixtures that appear excessive for the reasons described at page 5-6 of EMCAC's January 16, 2007 65% Design Report. Considerations of deference to historic integrity and historic design should apply to the issue of number of restroom facilities when that number is so large that it compromises the architectural, visual and functional significance of the passageway between the North and South Halls and associated arched doorways.

**Pedestrian Access to West Façade.** EMCAC renews its advocacy for the removal of the alley chimney to provide pedestrian access from C Street to the West façade. EMCAC has previously expressed concern about providing two ADA entrances on the east façade of the South Hall and their associated ramps and railing that would be located inside of the South Hall because of their impact on the South Hall vendors whose stalls are adjacent to those new ramps and railings. Further problems associated with using the east façade as the primary ADA access to the South

Hall is the congestion and high level of pedestrian traffic that occurs along the Farmers' Line on weekends. In its January 16, 2007 Report concerning the 65% Design Submission, EMCAC recommended that only one of the South Hall east façade ADA entrance ramps and railings be provided and that access to the west façade entrances to the South Hall be improved by removal of the existing chimney, which would thereby provide an unimpeded walkway from C Street along the west façade. If a third ADA entrance is needed for the South Hall, it can easily be provided on that west facade, without the requirement of an interior ramp or railing.

The noncontributing brick chimney was built in the 1940s to serve a coal-fired heating boiler. The chimney now serves merely as a chase for a metal flue from the boiler. To provide flue vents for the boilers, we understand the corner chimneys are not large enough for the conventional boilers. One possible alternative would be to evaluate the use of pulse-combustion or condensing boilers that have smaller flue requirements. To the extent that is not possible, some form of chimney-through-the-roof venting of the boilers might be designed that is compatible with the restored corner chimneys, as an alternative compromise.

Additionally, EMCAC recommends that the dumpster and trash compactor be relocated to the other side of the alley to further improve pedestrian access from C Street to the West façade of the Market. As at least a part of the source of the fire, we now have that additional justification for its relocation.

**Roof.** EMCAC supports restoration of roof to its original appearance, including the corner chimneys, continuous ridge vent and ornamentation.

A significant issue involves the small, framed openings adjacent to the ridge vent of the South Hall. Apparently these were designed to accommodate skylights in the original Adolf Cluss design, but were either never installed as skylights, or were covered over. The question is which is the correct design for restoration? The two exterior period photos we have on Sheet 1.1 indicate:

- 1914 (National Archives) Skylights are not shown, raising the possibility they were covered over during the 1908 Snowdon Ashford rehabilitation that was undertaken at the time of the North Hall addition.
- 1886 Aerial Photo (Library of Congress). Stephen Ackerman, a writer who is currently researching a book on Eastern Market, has identified this photograph as being taken from the dome of the Capitol, and based on the presence or absence of surrounding buildings, determined it was taken between 1880-82. It does not show any evidence of skylights on this west side, and it makes no sense that Cluss placed any on the east side that we can't see, or that they were covered over less than 10 years after their installation.
- The framework that is now visible next to the ridge vent (shown in the 1972 photo on Sheet 1.1 and detailed on the left side of Sheet 1.2) is of a type that was likely designed for skylights. So we are left with the probability that Cluss designed skylights, but they were not installed when the building was constructed in 1873, or they were covered over sometime prior to 1880-82.

Research by Dr. Ackerman indicates that while Cluss did design buildings with skylights, none of his Markets had skylights in the roof plane (though some may have had vertical clerestories in a monitor-type ridge structure). As for the proposition that skylights were originally installed and later removed, Dr. Ackerman has found no appropriation or funding for any such removal work. Probably the best conclusion is to simply credit Cluss' foresight, and conclude that while he designed a market building, his design took into account the possibility that it might be converted to some other use, and he simply built in the flexibility for later installation of skylights if it was later converted to a non-market use.

Such a resolution of the skylight question is consistent with sound food handling and health considerations. We now understand that direct sunlight is harmful to displayed food both in terms of inducing spoilage and in causing the food to have a "washed out" or undesirable appearance, as explained in the Attachment to this Report, prepared by the Eastern Market Tenants' Council. EMCAC recommends that the former skylight openings not be installed as skylights, but left covered over.

Another change that was apparently implemented during the 1908 renovation was the addition of ventilators on top of the ventilating ridge. While gravity will likely achieve adequate air circulation to exhaust hot air during warm months, the use of mechanical ventilators, similar in appearance to those that appear in the 1914 photograph, or installed out of sight within the ridge structure (which would be closer in appearance to Cluss' original design) should be provided to allow seasonal control of the venting process.

The restoration of the corner chimneys will be visually attractive, and to the extent they can be used to vent merchant and tenant requirements (e.g., the bakery shop and pottery studio) they would obviate the need for additional roof penetrations.

**Trusses.** As explained on Sheet 1.6, QEA has concluded that the existing trusses can not meet current structural requirements. The determination has been made to design replacement trusses that would match the appearance of the original trusses, but with sufficient load carrying capability that the replacement trusses would be installed at every other bay and would carry the entire roof load, and the original trusses would be preserved at alternating bays as non-structural elements. EMCAC respects this decision and suggests that, consistent with the next section of this Report, that consideration be given to preserving one of the removed trusses with failed connectors for display at the Market and offering the other removed trusses to historical societies, museums or other organizations that might use the trusses in their collections as a means of raising awareness and for possible fund raising.

#### **Restoration, Re-Use, Documentation, and Protection of Original Building Elements.**

EMCAC applauds OPM's plans to reuse the original trusses in the repair/refabrication of the truss system. In general, we recommend that as much of the original fabric of Eastern Market be retained and restored, or refabricated, wherever possible.

Historic Documentation. Where original building elements cannot be retained and restored, they should be documented to the HABS/HAER (the Historic American Buildings Survey and the Historic American Engineering Record) standards. This involves, in part, measured drawings and large-format photographs.

There has been much documentation of the Market through the years, but there needs to be documentation of what historic fabric remains and an assessment of its condition. While the architects are documenting and analyzing those parts of the building that are in their current scope of work, we believe they are not documenting to the HABS/HAER standards, nor are they documenting building material outside the scope of their work, such as the market master's office on the second floor. The market master's office contains original lighting fixtures, windows and woodwork, flooring, and wallpaper remnants that should be analyzed to determine what the original wall treatment was and how it changed over time. Also, there may be building materials that will be damaged or destroyed during the restoration/renovation work, so a comprehensive documentation should be done, in tandem with the renovation work if need be, as soon as possible.

We need to establish the scope of documentation prior to the start of construction, during the progress of construction, and at the end of construction that is currently in the QEA contract. Then, if the HABS/HAER level of documentation is too high a standard, perhaps we can develop a supplement to that level of documentation already required in the QEA contract. This could be accomplished either by adding the work to the architect's scope of work or the work could be done separately through a materials conservation specialist. Ms. Hanousek, a member of EMCAC and of this subcommittee, is in discussion with Gretchen Pfaehler, Director of Historic Preservation for Ewing Cole and member of the Board of the Association for Preservation Technology International, who is interested in assisting with this project. There is potential for fast-tracking a project for students to do the work, under Ms. Pfaehler's guidance.

Building Record & Public Education. Where original building fabric cannot be retained and reused and is documented, there should be an opportunity to use the material for educational purposes. We recommend developing a plan for future exhibition of artifacts on site, perhaps in the small Market office just off the main entrance. Photographs at the HABS/HAER level of quality, for example, would not only provide a permanent record of the condition of the historic building elements post-fire, but could also be part of an educational exhibition. We also recommend contacting the DC Chapter of the Association of Preservation Technology for suggestions of possible homes for our unused historic material, in addition to the National Building Museum and the Smithsonian.

Protection of Historic Fabric. There should be an assessment and then a plan of how to protect historic fabric during the construction process. The architect, or materials conservation specialist, should be able to provide a written plan of how the significant historic materials, such as the Market Master's office, the trusses, the windows, and the Center Hall skylight will be protected from damage throughout construction.

The EMCAC is fully prepared to assist in all of the above activities as needed.

**Basement.** Because of the existing 7' 11" ceiling height in the main part of the basement, QEA explained that this part of the basement could not be used for future public purposes (the south end of the basement has an extra foot of ceiling height and can be used for public purpose, and is being considered for the relocated Pottery Studio). EMCAC supports the present proposed use of the main (or northern) part of the basement for merchant storage and seasonal freezers. In terms of the longer view, EMCAC advocates providing the flexibility for future adaptive reuse.

Ceiling Height. The plans to remove the temporary steel columns, relocate the storm drains outside the building, bury the sanitary wastes below the basement floor, waterproof the basement, and excavate for a sidewalk elevator, compressor vaults, and underground air intake ducts represent fairly extensive work that will be done in the basement. EMCAC suggests that there will never be a better time to underpin the main part of the basement to gain additional ceiling height, which would result in the same ceiling height as the south end of the basement and provide the flexibility for future public reuse of entire basement

Window Wells. Sheet 3.1 shows that the window wells for the southern part of the basement will be covered over with bullet glass floor assemblies, which will provide light to this part of the basement, but the window wells for the northern part of the basement are proposed to be paved over. EMCAC recommends that the bullet glass treatment be provided for all window wells, to provide light for the current merchant storage and to provide the flexibility for possible future reuse of this space.

Merchant Access. The proposed provision of a sidewalk elevator on the alley side will allow deliveries to the basement to be accomplished directly from the alley. The use of the basement for merchant storage would be further enhanced by providing one or more dumb waiters to make it easier for the merchants to move supplies from the basement to the first floor.

**HVAC.** EMCAC understands that the revised distribution system will locate the air handlers and main duct system in the basement, with risers for distribution along the walls and thereby minimize the amount of visible mechanical equipment in the South Hall. Additionally, reversible overhead fans (similar to what were installed over the merchant stalls) should be provided to assist in seasonal air distribution.

EMCAC opposes the use of airlock vestibules on all doors, since they would intrude into the South Hall space. Likewise, the use of vestibules on selected doors would be of questionable effectiveness, due to the large number of doors. Providing an interior set of doors at the main

entrance may be appropriate, if it can be done in a manner that does not detract from the visual experience of entering the market.

**South Hall Window Treatment.** Certain of the windows will require replacement sash, which should be accomplished with historically accurate replications of the originals. QEA is proposing to use interior shades for light control for the North Hall (Sheet 4.1), but it is unclear what is proposed for sunlight control in the South Hall. The type of glass used for the glazing involves competing goals of food safety, energy efficiency, and historic appearance considerations. QEA is currently proposing low "e" glass be used, which does not address other spectral issues such as UV, glare or other sunlight control issues. The Tenants Council has pointed out that even with the occluded plastic glazing, sunlight control was an issue in terms of heat gain and a washed-out appearance of displayed meats. Glazing can be spectrally selective (tinted or coated to accomplish UV and IR control), and the harmful effect of direct sunlight on displayed food as well as glare concerns can likely be addressed with special glass designs such as fritted patterns. Shades or blinds to provide sunlight control, which would require regular adjustment as well as impose maintenance requirements, are not appropriate for the South Hall. EMCAC recommends that sunlight control be accomplished with the glazing, rather than the use of shades or blinds,

**South Hall Floor Replacement.** EMCAC fully support replacement of the floor to eliminate the problems noted in the report of Bell Architects, which raised the issue of the integrity of the unreinforced concrete floor (page 9). Also, the May 11, 1998 McMullan Report notes that the fill under the concrete floor consists of sand, terra cotta and soil, with "numerous voids" which does not provide continuous support of the un-reinforced concrete floor slab and "probably accounts for the observed cracks and depressions in the finished floor surface." Over time, that erosion of the fill under the floor has increased. Replacement of the floor with a properly reinforced slab (designed to retain the existing brick barrel vaults and masonry arches in the basement) would permit removal of the added steel columns in the basement to make the basement more useable as well as resolving the structural integrity issues. The McMullan report also pointed out that the continuous corrosion of the "I" beams built into the floor has resulted in a loss of metal and thus their remaining integrity needs to be addressed in designing the replacement floor system. Treatment of the exposed concrete floor surface in terms of hardeners, non-slip texture, etc. should also be addressed.

**South Hall Merchant Guidelines.** EMCAC is supportive of merchant design guidelines in terms of basic stall layouts, provision of hand-washing sinks and 3-compartment sinks where required by code. In terms of City-provided equipment, that should also include overhead fans due to their usefulness in seasonal air circulation and control of flying insects. Consideration should be given to providing for the display of Merchant licenses. Also with the amount of additional vendor equipment (sinks, electric panels), the layout of the duct system will have to be carefully designed to insure that the coolers and freezers can be installed flush with the wall. Another consideration is to locate the coolers and freezers so as to minimize window obstruction. Some of the doors will be blocked by the equipment: they should be made

operable, but locked, to accommodate future stall reconfigurations. EMCAC also supports the merchant individuality that will be accomplished through Merchant supplied signage and display lighting. The proposal to limit overhead storage on top of the merchant coolers will reduce the appearance of clutter.

**Merchant Compressor/Condensers.** Sheet 8.1 shows gang compressor vaults located below grade in the alley, to provide central condensing units in place of the current individual remote compressor/condensing units that are located throughout the basement. At the 65% design stage, a large portion of the ventilation and cooling was proposed for the purpose of removing the heat generated by the several vendor compressor units (primarily located in the basement). EMCAC had urged a better solution be found for this situation. The proposed gang compressor configuration would address these concerns, but raises additional concerns about the different temperature requirements of freezers, chillers and display cases, as well as issues of reliability. EMCAC suggest that outreach needs to be done with the merchants to address the issues of reliability and the provision of adequate redundancy in case a single unit fails. An alternative may be to provide some form of split system, where multiple compressors could be used, with central heat rejection (condensing) unit.

**Separate Bid Package.** The May 17 OPM Memorandum proposes a separate bid package for the roof system in order to speed the repair and re-use of the Market, which would allow roof restoration to begin in early October. EMCAC suggests that this separate bid package also include some treatment of the doors and windows sufficient to enclose the Market before the coming winter, so work can proceed within that weatherized, enclosed building.

**The Arch Stall.** This is not directly addressed in the recent submissions. EMCAC has previously recommended that this space should be used for a community bulletin board. An impediment to implementing that recommendation has been the existing vent from Market Lunch that blows out through the bead-board and causes this area to be avoided both as a vending space and by the public because of the odor. This exhaust vent is now proposed to be relocated, either to one of the South Hall corner “chimneys” or to the roof of the Center Hall, as are the other Market Lunch exhaust vents.

EMCAC supports this relocation, and asks that as the design progresses, that it also include the installation of the community bulletin board in this area.

**Exterior Lighting.** EMCAC supports most of the exterior lighting that is now being proposed on Sheet 2.1. EMCAC has previously recommended the need for additional exterior lighting: February 28, 2006 EMCAC Report concerning the 35% Concept Design, April 13, 2006 EMCAC Report to OPM, which addressed only the need for additional exterior lighting, January 16, 2007 EMCAC Report Concerning 65% Design Development Submission.

EMCAC's concern with the illustration on Sheet 2.1 is two-fold: it does not show the Farmers' Line shed, which will obscure much of what is being shown, and the attractiveness of the drawing is largely due to the assumption that the interior lighting will be kept on at night to produce a "glow-from-within" look through the windows.

Lighting of the 7<sup>th</sup> Street Façade. Despite EMCAC's concerns with some aspects of the illustration on Sheet 2.1, EMCAC fully endorses the emphasis that the proposed exterior lighting will provide for the main South Hall entrance and the lighting of the flag-pole. At the time the current Farmers' Line Shed was designed, the community was promised lighting on the building side of the shed to illuminate and highlight the architectural features of the building: not so much in the nature of up-lighting, but rather lighting that would "wash" the entire 7<sup>th</sup> Street façade with "soft" lighting. The community and EMCAC endorsed this lighting proposal and have advocated its installation since the time of the Farmers' Line Shed design. The Shed-side lighting would likely work well with the main entrance emphasis lighting and flag-pole lighting that is proposed on sheet 2.1. EMCAC suggests that the pole lights shown at the two ADA entrances will not be necessary under the Shed-side lighting arrangement, and to the extent they are proposed for the purpose of directing attention to these entrances, that purpose is questionable, with the Market's day-time, rather than night-time operation. The current display lighting under the shed was designed for display of vendor products, but has come to be used for night-time illumination. The Shed-side lighting, entrance-emphasis lighting, and curbside-Shed lighting, should be coordinated to provide adequate and attractive night-time lighting without using the display lighting.

Lighting of the C Street Façade. Lighting of this area has not been previously discussed, but EMCAC agrees that it should be lighted and endorses the proposal on sheet 2.1. However EMCAC does caution that attention needs to be given to the design of the pole lights that are proposed, so that they are coordinated with the design of the antique, replication, street lamp that DDOT has agreed to provide at the corner of 7<sup>th</sup> and C Street as part of the Streetscape.

Lighting of the North Plaza. The North Plaza is a large outdoor space, which serves well as a space for weekend vending, but because of the lack of lighting, it is a dead-zone after dark, and is generally avoided by pedestrians. The proposed Special Event lighting will allow the large outdoor space of the North Plaza to be used for night-time events. However, EMCAC suggests the special event lighting should be designed to be controlled to operate only at the time of such events, and that in addition to the special event lighting, that general purpose lighting also be provided for when there are no special events. General purpose lighting would serve night-time users of the North Hall as well as passers-by, in the same manner as streetlights would in terms of brightness at the curb. An additional source of general purpose lighting for this façade would be lighting that would be coordinated with the lighting on the Farmers' Line Shed to illuminate the architectural features of this north facade of the Market building

Lighting of Signs and Banners. The signs and banners being designed by Edge Advertising should be assessed to make sure that the emphasis lighting and lighting for architectural details is not offset by the new focus on the building created by the signs and banners. The most important lighting issue is at the main entrance sign, but all sign areas should be considered.

**Paint.** Up until this point, EMCAC has been advised that this project is a rehabilitation and not a restoration, and thus it is not necessary to attempt to determine what the original paint colors were. EMCAC notes that at the time of the Heery Report, David Bell Architects did a complete analysis of paint samples to determine original colors. EMCAC recommends that analysis be consulted as the starting point in selecting paint colors of the renovation of the Market. EMCAC is not advocating absolute adherence to those original colors; for example, EMCAC has previously recommended contrasting, period colors to distinguish the cast iron from the wrought iron elements of the unique Cluss-designed South Hall trusses, recognizing that originally they were probably a single color. EMCAC recommends a painting scheme that is based on the original colors, and where appropriate, the use of color to emphasize the unique architectural features of the building be employed.