Not Brick by Brick: Development of Interior Landmark Designation Policies in Washington, D.C.

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Not Brick by Brick: Development of Interior Landmark Designation Policies in Washington, D.C.
I: INTRODUCTION

The Supreme Court’s 1978 decision in Penn Central Transportation Co. v. City of New York firmly established that state and local governments may enact land use regulations that further the concerns of historic preservation. The Court declared that the protection of the “cultural, historical, aesthetic, and architectural assets is an aspect of the public welfare” that the states are empowered to protect pursuant to the police power. But Penn Central only confirmed the validity of New York City’s Preservation Law as applied to proposed exterior alteration since the interior was not at issue in the case.

Thus, even though the National Historic Preservation Act of 1966 treats building interiors equally with exteriors, states have been slow to articulate standards and criteria for the evaluation of interior designations.

Interior landmarking seeks the preservation of significant spaces without impinging upon the adaptive use of private property, a balance with political overtones that has perhaps made states wary. However, arguments for measured interior designation are compelling. Not only is there no qualitative difference between interiors and exteriors in terms of historicity, but also interiors often provide better examples of architectural excellence and technical skill than exteriors. Indeed, there is a growing resentment of so-called “Disneyfication,” buildings that from the outside are preserved in their original

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2Id.
state but on the inside have lost all of their significance. Moreover, lack of preservation may allow over-renovation of interiors, threatening the building’s structural stability.

In seeking a coherent policy for interior designation in Washington, D.C., both court decisions and Historical Preservation Review Board (“HPRB”) designations will be considered. The future of interior landmarking depends on a rational and organized set of criteria to create expectations for property owners. As Scott Rothstein points out, with over 1800 preservation commissions in the United States, property owners have become accustomed to exterior designation and regulation. Well-defined policies for interior landmarking are also needed to properly extend property owner expectations in the area of interior designations.

II: JUDICIAL DECISIONS ON INTERIOR LANDMARKING

In attempting to derive legal standards and criteria for determining what interiors may be designated, it is instructive to examine a spectrum of court decisions to establish parameters for evaluating when and under what circumstances designations will be upheld and accorded judicial deference. Since challenges to interior landmarking have been limited, very few courts have had the opportunity to comment on and review local historic preservation commissions’ ability to designate. Indeed, authority to stipulate what types of interiors qualify for protection seems contingent on specific provisions of local historic preservation ordinances, the potential viewability of the space by the public,

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6See Scott H. Rothstein, Comment, Takings Jurisprudence Comes in from the Cold: Preserving Interiors Through Landmark Designation, 26 CONN. L. REV. 1105, 1134 (Spring 1994) (arguing that interior designation should not be judged harshly under existing takings jurisprudence).
and the special character and singularity of the interior itself. From the perspective of the court, an interior must serve as a quasi-public space to withstand judicial scrutiny.

A: Washington, D.C.

Interior landmarking in Washington, D.C., derives much of its justification from the 1986 decision in Weinberg v. Barry. Here, the court held that the designation of the interior of the Warner Theater did not constitute a per se violation of the Fifth Amendment’s prohibition on takings without just compensation. Don’t Tear It Down, Inc., a local preservation group, filed applications to designate the exterior and subsequently the interior of the Warner Theater as landmarks. Plaintiff owners contested the designation of the building because of the significant burdens accompanying landmark status. Attempting to permanently evade designation by invoking a technicality, the plaintiffs argued that both the interior and the exterior of the building had been illegally designated because the Joint Committee, which served as Review Board until the Historic Preservation Review Board was established in May 1983, failed to act upon the pending designation application within ninety days of its filing. Despite this failure, the court determined that the HPRB’s designation of the exterior and interior as historic landmarks should not be set aside. Because the Joint Committee was simply an interim Review Board composed of private citizens, it did not behave with the “rigor demanded of a government agency.” The court further stated that “strong public policy concerns” mitigate in favor of interpreting the potentially severe consequences of

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8 Id.
9 Id. at 87.
10 Id.
11 See D.C. CODE § 5-1002(6)(B) (1981) (requiring a determination within 90 days of receipt of a permit application or the property will not be considered an historic landmark).
12 Weinberg, 634 F. Supp. at 91.
13 Id.
the District of Columbia Historic Landmark and Historic District Protection Act of 1978 ("D.C. Act") to apply only to a “properly constituted” D.C. agency. The failure of the interim committee to act within the ninety-day timeframe did not forever bar the HPRB from designating the theater as an historic landmark.

The plaintiffs also argued under the Takings Clause that no designation of a building interior can serve a valid public purpose unless the government requires public access to the building. The owners claimed that absent any public viewability requirement, any designation would fail to serve a legitimate public interest. In the alternative, plaintiffs contended that if public access were mandated, designation would serve a legitimate public purpose but would effect a permanent invasion of private property, denying the owners any economically viable use of their property. But the court determined that public viewing of the historic area is not necessary to serve a public purpose under the D.C. Act. While the articulated purposes of the D.C. Act refer to “public benefits other than visual enjoyment,” such as attracting visitors and tourism and thereby enhancing the economy, the court determined that the ability of the public to view the interior is not essential. Moreover, the court emphasized that, “numerous conceivable private uses of interiors of buildings are compatible with public viewing. Any private use which depends on public patronage, like a hotel or department store,

14Id.
15Id. at 93.
18See D.C. CODE §§ 6-1011-1115 (1981). The purposes of the D.C. Act are: to accomplish the protection, enhancement, and perpetuation of features or landmarks which represent distinctive elements of the city’s cultural, social, economic, political, and architectural history; to safeguard the city’s historic, aesthetic, and cultural heritage; to foster civil pride in the accomplishments of the past; to protect and enhance the city’s attraction to visitors, thereby supporting and stimulating the economy; and to promote the use of landmarks and historic districts for the education, pleasure, and welfare of the people of the District of Columbia. D.C. CODE § 6-1101(a) (1981).
19Weinberg, 634 F. Supp. at 93.
would permit the public to view and enjoy the theater.”

“A theater is but one instance where, without mandating public invasion of the building or depriving its owners of its only economically viable use, the government can reasonably be expected to satisfy many of the purposes of a historic preservation statute.”

Even though D.C.’s statute does not explicitly mention the protection and designation of interiors, the Weinberg court included them under the rubric of fulfilling the goals of the D.C. Act. Private use need not accommodate public viewing to further the designation of historic interiors; interior landmarking is sanctioned in D.C.

B: Philadelphia

Tandem cases arising in Pennsylvania illustrate that courts will strictly construe historic preservation statutes regarding the ability to designate interiors. In *Sameric Corp. of Chestnut St., Inc., v. City of Philadelphia*, the court held that the Philadelphia Historic Preservation Commission did not exceed its authority by designating the interior of the Boyd Movie Theater as an historic site that merited preservation.

The commission found that the Boyd Theater was both the work of a prominent Philadelphia architectural firm and that the theater’s interior remained a rare example of a substantially intact “Art Deco movie palace” representing a significant phase in American cultural history. The commission regarded its mandate to designate the theater’s interior as deriving from Philadelphia Code section 14-2007, which vests the commission with the authority to landmark “buildings, structures, sites, and objects.”

Relying on the ordinance’s definition of “building” as “a structure, its site and

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20*Id.*
21*Id.*
23*Id.*
24*Id.* at 156.
appurtenances created to shelter any form of human activity,” the court agreed with the commission’s interpretation that for a building to effectuate the process of sheltering, it “most certainly” requires an interior. 25 Indeed, without explicitly referencing building interiors, the ordinance seeks to protect architectural styles that exemplify historical and cultural development. The court further stated, reminiscent of the Weinberg decision, that public viewing is not the sine qua non to serve a public good. 26 Allowing a private property owner to evade designation of his building’s interior merely because the owner may choose to deny public access would result in the deprivation of the opportunity to preserve historic resources. 27 Landmarking of interiors not only enshrines values of the past but also encompasses the opportunity for future generations to enjoy building interiors.

Yet in a 1993 Pennsylvania Supreme Court decision, the holding in Sameric was overturned. In United Artists’ Theater Circuit, Inc. v. City of Pennsylvania, 28 the court found that the Philadelphia Historic Preservation Ordinance did not authorize the designation of the Boyd Theater interior as historical. 29 Though the court made special mention of the highly stylized interior elements, enumerating the theater’s magnificent etched, gilded, and stained mirrors decorated with nudes and flowers, the court nonetheless stated that there is no “clear and unmistakable authority” to designate interiors of buildings. 30 Explicit instruction and direction to designate interiors was not contained in the statute, hence the court determined that the plain meaning of the

25 Id. at 157.
26 Id. at 158.
27 Sameric, 558 A.2d at 158.
29 Id.
30 Id. at 621.
ordinance required maintenance of the interior only for the express purpose of supporting the exterior of buildings.\textsuperscript{31} Therefore, it would appear that the precise wording of the local historic preservation ordinance to include interior designation is necessary to a court deferring to the landmarking of an interior. Unlike in \textit{Weinberg}, the court in \textit{United Artists} did not finesse coverage of interior designations into its historic preservation statute.

\textit{C: New York}

The Court of Appeals of New York extended the reach of historic preservation of interiors to include designation of fixtures appurtenant to the interior. In \textit{Teachers Ins. \& Annuity Assc. of Am. v. City of New York},\textsuperscript{32} the court found that designation of interior items did not violate the prohibition on the designation of spaces for specific uses.\textsuperscript{33} Landmark status was accorded to the interior of the Four Seasons Restaurant including the lobby, Grill Room, Pool Room, walnut bar, and wall, ceiling, and floor surfaces.\textsuperscript{34} Designed by celebrated American architect Philip Johnson, the interior was both a quintessential expression of the International Style and a reflection of the building’s modular design by famed architect Ludwig Mies van de Rohe.\textsuperscript{35} Moreover, the historic preservation commission designated the restaurant interior on the basis of its “special character” and historical and aesthetic interest and that it is customarily open and accessible to the public.\textsuperscript{36} Creating an analogy to the \textit{Weinberg} decision, the court found that, “no less than a theater,” a restaurant by the very nature of its business invites the

\textsuperscript{31}Id. at 622.
\textsuperscript{32}623 N.E.2d 526 (N.Y. 1993).
\textsuperscript{33}Id.
\textsuperscript{34}Id. at 528.
\textsuperscript{35}Id. at 527.
\textsuperscript{36}Id. at 528.
general public to enter.\textsuperscript{37} Therefore, an interior to which the general public is customarily invited, irrespective of its intended purpose, falls within the ambit of the statute. The court further reiterated that the potential for conversion of interiors to private use cannot preclude the landmarking of appropriate interiors.\textsuperscript{38} Finally, provided that a rational distinction is drawn between fixtures integral to the design of the interior space and items that merely enhance the interior’s ambiance, appurtenances may warrant designation.\textsuperscript{39} Embellishments to a building’s interior necessary to further the atmosphere which lends the space its historicity qualify for court deference to the designation.

Despite a paucity of cases involving the historic preservation of interiors, the thread of judicial decisions clearly indicates that interior landmarking is permissible in both Washington, D.C., and New York. Centering on such quasi-public spaces as theaters and restaurants, these decisions suggest several criteria for evaluating whether an interior designation will withstand scrutiny. Potential accessibility by the public, present or future; specific, explicit statutory authority to landmark interior spaces; and fixtures essential to the creation of the character of the interior are qualities of interior designations which courts seem to permit.

\textbf{III: \textit{INTERIOR DESIGNATIONS IN WASHINGTON, D.C.}}

To ascertain rational standards and legal principles underpinning the designation of interiors in Washington, D.C., it is important to evaluate the types of buildings which have been afforded landmark status.\textsuperscript{40} Examination of specific categories of structures reveals the themes and considerations on which the Historic Preservation Review Board

\textsuperscript{37}See \textit{Teachers Ins.}, 623 N.E.2d. at 529.  
\textsuperscript{38}Id. at 530.  
\textsuperscript{39}Id.  
\textsuperscript{40}Through the generosity and courtesy of David Maloney, Deputy State Historic Preservation Officer, records of all interior designations in Washington, D.C., were made considered.
have placed great weight. The eleven interiors which have been granted designation will first be compared and then contrasted with other interiors whose applications for designation were denied to discern potential unifying characteristics of interiors warranting protection. First, apartment buildings, with their ornate lobbies and hallways, will be discussed. Second, lavish, opulent private houses designed specifically for prominent Washingtonians will be examined. Third, the grandeur of banking institutions will be the subject of focus. Fourth, structures whose interiors represent their most notable and remarkable feature will be considered. Finally, neighborhood motion picture theaters, often constructed with elaborate interiors, will be assessed. The examination of these categories should also be viewed as a barometer in weighing the question as to whether designations thus far have been overly generous or too restrictive.

A: Apartment Buildings

In considering four apartment buildings, all of which achieved interior landmark designation, three overarching characteristics are shared as key qualities that support interior designation. Interior as continuation of and counterpart to the building’s exterior architectural style, the association with a prominent architect or developer, and the building serving as an example of the shift in attitudes that made apartments luxurious alternatives to single family dwellings are themes motivating interior designations of apartment buildings.

Located at 3700 Massachusetts Avenue, N.W., Alban Towers was constructed in 1928-29.\textsuperscript{41} The building is primarily Gothic Revival in design, with tan-colored brick and limestone employed to simulate the monochrome composition of Gothic style.

The lobbies and hallways, with their richly ornamented Gothic/Art Deco elements, were deemed by the HPRB integral to the exterior scheme. Paved in quarry tiles of brown, orange, and ocher laid in a geometric pattern, the lobby is topped by plaster crown molding composed of rope and infilled with alternating roses, acorns, and thistles. These symbols of Great Britain serve to reinforce the English Gothic tenor of the building. The walls of the upper-floor hallways are covered in rough-finished stucco, lending a “sumptuous texture that is rarely found in apartment buildings.” Based on the elaborate and intricate detail of the lobby and hallways, the HPRB found that the interior merited designation because it represents an exceptionally fine example of superior design, construction, and craftsmanship characterizing luxury apartment buildings erected in Washington during the 1920s. Alban Towers’ highly decorative interior complements and reinforces the architectural style of the exterior.

The HPRB further rested its designation of the apartment building’s interior on its association with a prominent architect and developer team. Designed by Robert O. Scholz and built by David A. Baer, together they were responsible for the construction of at least eight apartment buildings between the years 1922 and 1931. As a result, they earned a reputation as one of the more important apartment house architect/developer teams of the post-World War I decade. Representing the product of the collaboration of Scholz and Baer who specialized in 1920s apartment building construction, Alban Towers reflects

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43 Id. at 4-5.
44 Id. at 5.
46 Application for Historic Landmark Designation for Alban Towers at 12.
the work of notable planners and architects who influenced the evolution of apartment construction in Washington, D.C.

Offering several amenities first introduced to Washington apartment buildings in the 1920s, Alban Towers is a testament to the changes in apartment design and construction after World War I. Billed as an apartment hotel, Alban Towers offered its residents 24-hour maid service and a public dining room.\textsuperscript{48} Indeed, on the ground floor of the building were housed a beauty shop, a travel agency, a grocery store, and a lunch counter.\textsuperscript{49} Each of the upper floors contained a maid’s lounge and a bathroom facility.\textsuperscript{50} Constructed during the decade in which apartment construction exceeded that of single-family houses, Alban Towers attempted to compensate for smaller family space by furnishing its tenants with luxurious amenities and public areas. The relative modesty of individual apartments is offset by the grandeur of the public spaces.\textsuperscript{51} Thus, Alban Towers’ designation as historical also derives from its reflection of critical changes in the development of social attitudes towards multi-unit living as expressed through architectural organization.

The Northumberland Apartments, situated at 2039 New Hampshire Avenue, N.W., embodies the distinctive characteristics of an early 20th Century luxury apartment building. Built in 1909-10, the apartment building helps anchor New Hampshire Avenue, a major element of L’Enfant’s 1791 plan, near its terminus at Florida Avenue, N.W., the original boundary of the federal city.\textsuperscript{52} An adaptation of 18th Century classicism, the

\textsuperscript{48}Decision of the Historic Preservation Review Board Re: Alban Towers at 1.
\textsuperscript{49}Id. at 2.
\textsuperscript{50}Id.
\textsuperscript{51}GOODE, supra note 47, at 173.
exterior features an eclectic collection of classical architectural elements composed of red and white brick and dressed limestone. The most distinctive feature of the façade is the Palladian-inspired recessed entry, which is framed by two pairs of Ionic columns and pilasters. In spite of the variety of materials and architectural embellishments, the exterior “hardly prepares one” for the “explosion” of decorative features and materials in the lobby of the building. Boasting two enormous fireplaces and four columns with ornamental composite capitals, the lobby of the Northumberland is distinguished by a wealth of decorative ornamentation derived from classical, medieval, gothic, and renaissance motifs. A classical frieze of wreathed laurel helps further dramatize the setting for the appearance of stained glass windows. The over-mantel decoration, one of the lobby’s most striking features, consists of armorial adornment incorporating heraldic devices such as a knight’s visor and a smiling chimera. The interior remains essentially unaltered and is considered the most distinctive lobby in Washington, D.C., by some architectural history connoisseurs. Elaborating on the eclectic vernacular of the exterior, the interior of the Northumberland enhances the richness of the apartment building.

Designed by Albert H. Beers and constructed by Harry Wardman, the Northumberland Apartments served to launch them into the forefront of the development and real estate business. The premiere developer of residential property in the first three decades of the 20th Century, Wardman is credited with instituting the apartment hotel in

53 Application to the National Register of Historic Places Inventory for The Northumberland Apartments, 1 (Feb. 5, 1980).
54 See id.
55 Id.
56 Id.
57 See id.
58 Application to the National Register of Historic Places Inventory for The Northumberland Apartments at 1.
Washington just prior to World War I. At the time of Wardman’s death in 1938, it was said that one of every ten Washingtonians occupied a Wardman home. The Northumberland Apartment’s association with Harry Wardman furthers its candidacy for historical.

The interior of the Northumberland is an excellent example of the combination of expensive materials and skilled craftsmanship prevalent during the Golden Age of luxury apartment buildings. After functioning as an apartment hotel from its 1910 completion until 1920, the building became a cooperative apartment complex. As the oldest, continuously self-managed cooperative, it was a “pioneer” in a field of housing new to the District of Columbia in the early years of the 20th Century. With the lavish décor of its lobby and the significance in the development of cooperative housing, the Northumberland Apartments stands as a monument to a by-gone era of both social and architectural opulence.

Sitting at 2022 Columbia Road, N.W., the Wyoming Apartments boasts one of the best surviving plaster and marble apartment lobbies from the Golden Age of apartment buildings both in Washington, D.C. and the entire country. The original building, constructed in 1905, consisted of a large, stately structure in the Classical Revival style. Of a simple I-shape plan, its front façade employed the classical columnar organization. Completed in 1911, the addition of the interior entrance pavilion served to link the two massive wings of the building and imbue it with a new syntax and style—that of the

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59 Application for Historic Landmark Designation for Alban Towers at 8.
60 Application to the National Register of Historic Places Inventory for The Northumberland Apartments at 5.
64 Id.
Beaux-Arts. Created of luxurious materials including softly variegated marble and ivory-colored plaster, marble columns, wainscoting, elaborate plaster moldings, ceilings, and cornices, and mosaic floors, the elements unite to produce an ambiance of elegance and tasteful living. The grandeur of the interior fulfills the promise created by the Wyoming Apartment’s façade and architectural organization; the interior furthers the exterior design.

The luxurious and complex public space of the Wyoming Apartments was designed by noted local architect, B. Stanley Simmons. Contributing to the appearance of many of Washington’s neighborhoods and to the city’s architectural heritage through his numerous rowhouses, apartment buildings, and commercial structures, Simmons was heralded for his “exceptional skill with creating public interior space.” The stylistic evolution of the Wyoming Apartments, through its numerous additions, demonstrates Simmons’ developing skill, awareness of, and handling of emerging architectural trends. Association with a prominent local architect once again provides justification for conferring historic status.

The interior of the Wyoming Apartments, in addition to its aesthetic significance, stands as evidence of the transformation of the apartment building into a fashionable and desirable residence. The 1911 addition of the elaborate and expensive pavilion illustrates a change in priorities from the simple unadorned entrance to the original 1905 structure. While the pavilion was certainly a practical solution to the problem of connecting apartment wings, its ornate and rich materials set a tone of taste and luxury. “No mere

65 Id.
67 GOODE, supra note 47, at 86.
69 Application for Historic Landmark Designation for the Wyoming Apartments at 3.
façade,” the lobby’s exceptional character, with fine workmanship in marble and plaster and attention to detail, stands as a constant reminder to elite tenants that the Wyoming was the home of people with the very best of taste.\textsuperscript{70} Notable residents included Dwight D. Eisenhower and his wife, Mamie, who lived in the Wyoming Apartments from 1927-28 and again from 1929-36.\textsuperscript{71} Indeed, the craftsmanship clarifies the rapid development of the apartment building as it evolved from exigency to luxury.\textsuperscript{72} As a visual testament to the era that witnessed the emergence of the apartment building as not only an acceptable but even attractive alternative to the single-family home, the Wyoming Apartments has value as part of the development and history of the city of Washington. The designation of its interiors exemplifies the changing social perspective towards apartment buildings in the early 20th Century.

3901 Connecticut Avenue, N.W. represents an excellent example of the Tudor Revival style as applied to an apartment building. Five-stories high and clad in red brick with cast stone detailing, 3901 Connecticut Avenue is roughly U-shaped in plan featuring a deep courtyard.\textsuperscript{73} The high degree of ornamentation found on the exterior is continued through the vestibule and lobby. The 1928 lobby remains unaltered and essentially intact, with the floor composed of grayish-tan marble with green marble edging.\textsuperscript{74} A decorative fireplace, capped by a plaster coat of arms, is inspired by 18th Century English prototypes.\textsuperscript{75} The English-derived style flourishes in the plaster ceiling panels and cornice

\textsuperscript{70}Id.
\textsuperscript{71}GOODE, supra note 47, at 88.
\textsuperscript{72}See Application for Historic Landmark Designation for the Wyoming Apartments at 3.
\textsuperscript{73}Decision of the Historic Preservation Review Board Re: 3901 Connecticut Avenue, N.W., Case No. 96-01, 1 (Apr. 4, 1996).
\textsuperscript{74}Application to the National Register of Historic Places Inventory for 3901 Connecticut Avenue, N.W., 5 (Aug. 4, 1997).
\textsuperscript{75}Id.
boasting heraldic shields. The highly detailed, intact lobby expands upon the Tudor Revival style of the exterior. Here again, extension of elaborate exterior into the interior space provides justification and incentive to designate the building’s interior.

Constructed in 1927-28, 3901 Connecticut Avenue is a notable work of prominent apartment developer Harry Bralove and prolific apartment building architect George T. Santmyers, Jr. Both men made significant contributions to the architectural development of the District of Columbia. While Bralove developed apartment houses and hotels during the 1920s, Santmyers is acclaimed for his design of an astonishing 440 apartment buildings in Washington between 1916 and 1949. Indeed, the modified U-shape plan illustrates how Santmyers successfully manipulated the massing of the building to provide the maximum amount of light and air to the units. Since 3901 Connecticut Avenue is the product of a distinguished architect who had a profound impact on the growth of Washington, D.C., the HPRB determined that the apartment building merited preservation.

The apartments of 3901 Connecticut Avenue exemplify several important trends in the evolution of apartment building design. Popularized during the 1920s, apartment living became much more widespread for the middle class. With spacious units, a handsomely detailed exterior and interior, and modern amenities, 3901 was designed to appeal to Washington’s burgeoning middle class. Modern kitchens and bathrooms, garage parking, location along a major transportation corridor, and sun porches offered...
middle class residents a respectable and less expensive alternative to home ownership.\textsuperscript{82} Moreover, small areas of green space at the front and sides of the building created a more suburban feeling residence than could be provided by downtown apartment buildings.\textsuperscript{83} By creating an attractive building with a suburban aura, 3901 Connecticut Avenue illustrates the apartment building’s transformation from simply low-cost housing to appealing and even elegant residences for the expanding middle class in this era of American culture. The building, then, is a structural representation of American social history.

Thus, Alban Towers, Northumberland Apartments, Wyoming Apartments, and 3901 Connecticut Avenue not only share interior designation status, but each displays all of those factors that have proven necessary to receive such designation. From the Tudor Revival style of 3901 Connecticut Avenue to the eclectic mélange of gothic, classical, medieval, and renaissance detail of the Northumberland Apartments, in all cases, the embellishments and ambiance of the interiors is a reflection and extension of the architectural style of the exterior of the building. The four designated interiors also share what seems the second important support for landmarking, that of association with a prominent architect or developer. Finally, the designated interiors of each building shine individual and revealing lights upon the changing social and cultural scene in early 20\textsuperscript{th} Century Washington, D.C. The evolution of the apartment building is a commentary not only on the expanding middle class but also the urbanization that marked America’s economic development in this era. The four buildings, then, provide a recipe which includes the ingredients for apartment buildings to attain designation. Where apartments

\textsuperscript{82}Decision of the Historic Preservation Review Board Re: 3901 Connecticut Avenue, N.W. at 2.
\textsuperscript{83}Application to the National Register of Historic Places Inventory for 3901 Connecticut Avenue, N.W. at 8.
are concerned, the HPRB has developed a rigorous and clear rationale for the awarding of interior landmark designation.

B: Private Houses

Just as interior designation of apartment buildings provides insight into the rational standards and legal principles that support landmark status, so, too, the examination of private houses offers another perspective on criteria for interior designation. Whereas interior designation for apartments is limited to the lobbies and hallways and general public spaces, the interiors of the Christian Heurich Mansion and the Alice Pike Barney Studio House are designated in their entirety; closets, bathrooms, even cabinetry have been landmarked. Moreover, these private houses share design concepts aimed at capturing the aesthetic and feel of a particular era and type of architectural style. Additionally, whereas the importance of the architect or developer was a key to apartment interior designation, here the importance of the actual residents seems an essential element of interior landmarking.

The designation of Christian Heurich Mansion includes the building’s interior spaces, finishes, and built-in fixtures. Built between 1892 and 1894 at 1307 New Hampshire Avenue, N.W., this four-story structure with finished basement is considered “the best extant example” of Romanesque Revival residential architecture in Washington, D.C. 84 Constructed for successful German immigrant brewer Christian Heurich, the interiors of this lavish private residence provide a view of the opulent domestic lifestyle afforded the wealthy merchant class in the late Victorian era. 85 The design and light stain of the woodwork throughout the house, as well as the tops of windows and door casings

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are presented in the Americanized Eastlake style. Bare parquet or tile floors with area rugs rather than wall-to-wall carpeting, carved chimney pieces with English style ceramic art tiles lining their openings, and portieres hung from brass rods with rings adhere to the tenets of the Aesthetic movement. A stairway of brass, marble, and onyx contributes to the grandeur of the entrance hall.

Additional support for interior landmarking was derived from the technological innovation and advances displayed in the Christian Heurich Mansion. A sophisticated system of indoor plumbing served the entire house, with water running through cast-iron pipes from the street to a boiler in the kitchen. Indeed, the Heurich Mansion was wired for electricity. All the lighting fixtures installed in the house were dual, providing illumination with gas and electricity. The house also had the distinction of being the first fireproof residence in Washington, D.C., with flooring and wood surfaces covered with a triple coating of hard-finished plaster. Landmarking has captured this innovative, trendsetting interior.

Designation seems also designed to memorialize the interior’s evocation of German culture and its contribution to American society. The ornamentation of the main hall mimics that of a medieval castle, featuring light gray encaustic ceramic tile flooring and a wall relief in the Baronial style. Indeed, the basement explicitly conveys its association with German culture with its Alt-Deutsche Bierstube (old German beer room). Wainscoting in composition relief was decorated to imitate old German

86 Id. at 8.
87 Id.
88 Id.
89 Id. at 39.
90 Application for Historic Landmark Designation for Christian Heurich Mansion at 38.
91 Id. at 5-6.
woodwork. The side walls of the Bierstube are elaborately painted in an old German Renaissance style as inspired by historical Munich and old German wine cellars and saloons. These murals, painted in soft natural colors and surrounded by a scrolling leaf and vine pattern, illustrate mottoes recounting “traditional German folk culture” and express the “benefits of drinking” and the hospitality associated with taverns. Designation has enshrined what the HPRB terms “the realized Rhineland castle dream” of an aspiring businessman of modest background.

Christian Heurich was indeed of modest background, but his business skills led not only to the accumulation of personal wealth but perhaps more significantly to the economic well-being of an entire neighborhood in Washington, D.C. His brewery, Washington’s largest before Prohibition, employed hundreds of workers and is credited with reshaping the Foggy Bottom/West End district at the end of the century. Heurich became the city’s largest landowner after the federal government and was personally involved in the construction of a number of housing developments to upgrade the quality of life of his employees. His cultural and economic importance lends support to the designation of his house.

The vast, flairful, innovative scope of the interior of Christian Heurich Mansion, combined with its manifestation of German style and, by extension, German contribution to the development of Washington, D.C., provide support for the preservation of the interior of this private residence. Indeed, the mansion was bequeathed to the Historical

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92Id. at 24.
93Id.
94Id.
96Id.
97Application for Historic Landmark Designation for Christian Heurich Mansion at 35.
Society of D.C. and currently serves as its headquarters, library, and period-house museum, affording the public access to its designated interior. These factors together with Heurich’s economic and social contributions to the city made his home a landmark.

The Alice Pike Barney Studio House, constructed in 1902-03 at 2306 Massachusetts Avenue, N.W., also sought to evoke European culture. Ms. Barney, an artist herself, aimed to create an interpretation of a building type prevalent in Europe during the latter half of the 19th Century, the artist’s studio. An “exceptional evocation” of the spirit of the Aesthetic style, synthesized with elements of the Arts and Crafts movement, the interior spaces of Barney Studio House are unique.98 Indeed, the assemblage of late medieval gothic furniture, Moorish planter and brass hanging chandeliers, and oriental rugs epitomize the eclectic disposition of the Aesthetic style.99 In plan, the dominant social rooms of the drawing room, vestibule, and parlor flow together, creating flexible, fluid space.100 The influence of the Arts and Crafts style is made manifest in flat, geometric wall planes, heavy, rectilinear beams unadorned by elaborate moldings, and planar oak woodwork.101 Just as with Christian Heurich Mansion, the elaborate decorative treatment of the interior seems the first pillar of support for designation.

Of paramount importance to Alice Pike Barney was establishing an artistic salon in the French style as a gathering place for a segment of society for the purpose of “interesting conversation.”102 Ms. Barney brought artists of the brush and artists of the theater together in this studio house, which became one of the centers of Washington’s

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98 Application for Historic Landmark Designation for Alice Pike Barney Studio House, 1, (July 21, 1994).
99 Id. at 7.
100 Id.
101 Id.
102 Id. at 21.
artistic life.\textsuperscript{103} Ms. Barney’s vision was to create a space with a two-fold purpose. She wished to capture the purpose-built studio made famous by Parisian society artists while at the same time providing a salon intime where friends of the arts would come invited to discuss and revel in the artistic scene. The French salon society, where artists and collectors mingled, was to be recaptured in Washington, D.C. Thus again, celebration of a foreign culture and its contributions to a still-young America are rewarded with interior designation.

The third similarity in private house interior landmarking is the prominence of the commissioning resident. Like Heurich, Alice Pike Barney was a formidable figure in the Washington, D.C. landscape. Socially active, she used the arts to campaign for public welfare.\textsuperscript{104} Indeed, the residence itself was used as a fundraising venue for community service programs such as Neighborhood House.\textsuperscript{105} Driven to bring culture to her nation’s capital, Barney created the Sylvan Theater at the base of the Washington Monument for the production of Shakespearian plays.\textsuperscript{106}

Therefore, Alice Pike Barney Studio House fulfills identical criteria for interior designation as Christian Heurich Mansion. The European influence, no doubt stimulated by Ms. Barney’s long residence in Paris,\textsuperscript{107} is commemorated. The exotic character of the interior and its relationship to the Aesthetic and Arts and Crafts movements is equally as significant as Heurich’s. Finally, Studio House, donated to the Smithsonian Museum after her death, was the product of the imagination of a prominent Washingtonian. Like

\textsuperscript{103}Application for Historic Landmark Designation for Alice Pike Barney Studio House at 2.
\textsuperscript{104}Id. at 8.
\textsuperscript{105}Id. at 2.
\textsuperscript{106}Id. at 28.
\textsuperscript{107}See id. at 21.
Heurich, Barney was a cultural influence on her generation. She used her patronage of the arts argue for cultural change.

The interior landmarking of private residences would seem to swing on three wires: eye-catching interior design, homage to a distinctive architectural type, and association with a prominent and productive Washingtonian. Strung together, these wires support an interior designation. Despite the unique qualities of these private houses, the clear rationale for interior designation displayed in the landmarking of apartment interiors is missing. The standards for interior designation of private residences are looser and more fluid.

C: Banks

The banking industry, with its desire to convey a sense of financial power and stability to its depositors, has produced buildings with interiors that are often impressive and ornate. Washington, D.C. has chosen to landmark the interiors of two such structures as representative of this early 20th Century trend. Each seems to have been selected for designation in an attempt to epitomize the bank-type style of architecture that prevailed before FDIC insurance made it less necessary for banks to project financial strength through classical architecture. While each institution designated also holds an important place in D.C. history during a period when much of the economic and social change was supported by the financing derived from banks, it should be noted that there are perhaps other banks of this era whose interiors might well merit designation. Whether the selected bank interiors are truly distinctive seems open to question.

The Equitable-Cooperative Building Association, located at 915 F Street, N.W. and built in 1911-12, is a monumental building constructed in the Classical Revival style.
Its façade is composed of rough-cut buff brick fronted by four colossal white marble Ionic columns resting on a granite base. The structure is organized on a Greek temple plan, with its exterior modeled loosely on the Temple of Athena Nike on the Acropolis. Classical detailing is evident throughout the exterior, with fully developed entablatures, ornamental molding, paneled bronze doors, and a central front porch completing the aesthetic. An impression of prosperity, solidity, and conservative rectitude is conveyed. The interior banking hall unites with the exterior in that it is also in the Classical style, replete with extensive ornamentation and detailing. Marble base molding and a band of mahogany wainscoting are surmounted by six fluted pilasters capped with Corinthian capitals. The pilasters support an elaborate entablature with foliated, dentilled, and egg-and-dart bandcourses. A shallow coffered ceiling tops the aesthetic. Here, interior landmarking rests heavily on the unity of exterior and interior. The HPRB noted that the very strength of the building as an edifice worthy of landmarking is based upon the integral relationship between the massive, open-fronted façade and the expansive banking hall on the interior. But interior landmark status was not accorded to the entire indoor area. The secondary board room and stair hall, though distinctive architectural features, were denied designation because of a lack of a substantial connection to the public realm of the interior and, more particularly, because these rooms were not

111Application for Historic Landmark Designation for Equitable-Cooperative Building Association at 4.
112Id.
113Id. at 5.
integrally related to the aesthetic of the street façade.\textsuperscript{115} Relationship with the exterior can thus be viewed as a significant factor in the interior landmarking of banks.

Historic significance is also a clear element of the designation. The Equitable-Cooperative Building Association was the longtime headquarters of one of the city’s oldest and most successful savings and loans.\textsuperscript{116} Ultimately becoming the largest S&L in D.C., the Equitable became known for progressive lending that supported the need for mortgage and banking services for average citizens.\textsuperscript{117} At the height of the Roaring 20s, the Equitable was able to announce in 1929 that it had financed the building of enough homes to fill a 200-square block area of Washington.\textsuperscript{118}

A bank born in the boom time of the 1920s is the 1925-26 Federal-American National Bank. Here, we find a Neo-Classical style structure celebrating the current prosperity. Located at 615-21 14th Street, N.W., and constructed of reinforced concrete, the four-story building is faced with limestone ashlar.\textsuperscript{119} Each street façade consists of five bays, with the ground floor treated as a monumental base and the second and third floors unified by a giant Ionic order.\textsuperscript{120} A two-story, round-arched window is recessed in the central bay. The doorway sports a segmental pediment with broken architrave and is ornamented with a large shield, female head, cherubs, and swags.\textsuperscript{121} The building is topped by a full Ionic entablature featuring a lion’s head set in the cornice at the division

\textsuperscript{115}Id.
\textsuperscript{116}Id.
\textsuperscript{117}Id.
\textsuperscript{118}See Application for Historic Landmark Designation for Equitable-Cooperative Building Association at 11.
\textsuperscript{120}Id.
\textsuperscript{121}Application for Historic Landmark Designation for Federal-American National Bank, 8 (Sept. 11, 1989).
between each bay. Furthering the Neo-Classical aesthetic of the exterior, the design of the interior is replete with Neo-Classical and Renaissance Revival decorative elements. The gilt and polychromed ceiling serves as an “excellent example” of the building’s attempt to symbolize the substantial power of the banking establishment. Walls and balustrades are ornamented with Ionic pilasters, and bas-relief panels depict griffins. Opulence aside, the interior of the bank was also innovative in that tellers’ cages, along with wickets and grillwork, were conspicuously absent, replaced by a wide counter topped by iron grating. Moreover, innovation was again expressed by the placement of the banking hall on a second floor, allowing commercial tenants to occupy the ground floor.

Perhaps most significant in the historical perspective surrounding the landmarking of the Federal-American is the bank’s ultimate failure. It was among the closed institutions that were unable to reopen after the National Banking Holiday of March 1933. Interestingly, it was also the Washington bank with the greatest investment in banking headquarters. The excesses of the 1920s as symbolized by elaborate Neo-Classical banking buildings foretold the coming Depression. The landmarking memorializes the most vicious business cycle in American history.

Banks, then, architecturally represent the American economic scene. In selecting these two landmarks, Washington, D.C. chose those that the HPRB hoped most epitomized this relationship. Interiors as extensions of lavish classical-styled exteriors

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122 Id.
124 Id.
125 Id.
126 Id.
127 Id. at 4.
were equally worthy of designation. The preservation and open access to history as expressed through interior design are clearly achieved in the landmarking of banking facilities. However, the qualities supporting designation seem likely to have been shared by many banks of the era. It is less than clear why the Equitable-Cooperative and the Federal-American National Bank stand out from the pack. The guidelines for bank interior designation seem rather blurry.

*D: Interior As Most Notable Feature*

The consideration of apartments, private houses, and banks showed that interior landmarking is most likely awarded to preserve quintessential expressions of genres from which numerous examples from a similar period are available. But in dealing with the landmarking of two structures, the Eastern Market and the Chevy Chase Arcade, whose interiors are their most notable feature, it is the very uniqueness that suggests designation.

The Eastern Market, situated at 7th and C Streets, S.E., shares continuation of its original function with the Chevy Chase Arcade. Built in 1873 with additions in 1908, Eastern Market is one of the only extant markets that retains its original interior, functional, spatial, and architectural character.\(^{129}\) The halls exhibit a robust expression of the Italianate style, with intricate and deep corbel tables, lombard bands, and a strong fenestration pattern of arched multi-paned sash and round windows.\(^{130}\) Eliminating the need for interior piers, both walls employ a roof truss to span the market floors, serving to create a sense of openness and spaciousness.\(^{131}\) The walls are purposely free from

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\(^{130}\)Id. at 1.

\(^{131}\)Application to the National Register of Historic Places Inventory for Eastern Market Interior, 3 (Nov. 14, 1994).
ornamentation and are constructed of plaster to permit easy cleaning. Indeed, the cement floors emphasize the public’s increasing awareness of the importance of sanitation in market environments. The market master’s office, placed above the market floor to allow for supervision of market activities, is among the significant character-defining elements of the space. Arched sash-windows and remnants of floral-patterned wallpaper provide the backdrop.

The historical significance of the market no doubt contributed to designation. It is considered a prime example of the essential need for public markets in the era before refrigeration. Moreover, it has continued to operate, as superior design, neighborhood acceptance, and a reputation for cleanliness have combined to keep an old concept modern and relevant. Indeed, the market is credited with stimulating growth and cohesiveness in its entire neighborhood. Here again, designation rests on singularity, historical significance, and continuation of original function.

The Chevy Chase Arcade, constructed in 1925 and located at 5520 Connecticut Avenue, N.W., is a finely designed Neo-Classical commercial arcade of the type based on 19th Century European precedents. It is one of the few surviving examples in the Washington metropolitan area. Indeed, it is the only small commercial building in the District that includes an arcade. Consisting of two-stories, the central passageway is covered by a high vaulted ceiling and lined on both sides with plate glass show windows

132 Id. at 7.
134 Id. at 3.
137 Id.
139 Id.
and doors.\textsuperscript{141} Pilasters carry a richly detailed entablature that features an elaborate projecting cornice with several rows of classical molding.\textsuperscript{142} The floor is of a black and white tile set in an alternating pattern.\textsuperscript{143} In assessing the reasons for designation, one must weight heavily the fact that the interior arcade is by far “the building’s most distinctive and important architectural feature.”\textsuperscript{144}

The arcade’s designation was not without consideration of the historical significance to the Chevy Chase community. Merchants had always favored arcades because they offered protection from traffic and weather and therefore attracted large crowds.\textsuperscript{145} The arcade has come to represent a monument to the beginnings of commercial activity in the neighborhood.\textsuperscript{146} It has stood the test of time, continuing to function today. Thus, as a most unique and aesthetically pleasing structure, dominated by its elaborate interior, the Chevy Chase Arcade won landmark status. Beauty, individuality, and longevity of function seem keys to interior designation.

Both the Eastern Market and Chevy Chase Arcade, each defined by its interior, are unique, offer glimpses into neighborhood developments in D.C., and continue to provide services to the public; this a prescription for interior designation.

\textit{E: Movie Theaters}

Designation of Washington movie theaters provides another opportunity to examine the criteria for judgment the HPRB currently uses. The MacArthur Theater, built in 1946, achieved interior designation while the interior of the Avalon Theater (formerly

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\textsuperscript{141}Decision of the Historic Preservation Review Board Re: The Chevy Chase Arcade at 2.
\textsuperscript{142}Id.
\textsuperscript{143}Application for Historic Landmark Designation for The Chevy Chase Arcade at 5.
\textsuperscript{144}See id. at 10.
\textsuperscript{145}Id. at 7.
\textsuperscript{146}Decision of the Historic Preservation Review Board Re: The Chevy Chase Arcade at 1.
\end{flushright}
known as Chevy Chase Theater), constructed in 1922, was denied protection. Located at 4859 MacArthur Boulevard, N.W., the MacArthur Theater has been deemed a “good remaining example” of the suburban motion picture theater in Washington. The HPRB may have wished to memorialize changes in post-World War II America wrought by the sweeping acceptance of the automobile as a household necessity. Designed in the streamlined Art Moderne style of bold geometric forms and economic use of materials, the architecture reflects the post-Depression ethics and aesthetics of the 1940’s economy. A large, freestanding one story red brick building, the theater features a simple and bold frontispiece with linear details. The smooth limestone façade is massed as two vertical piers flanking a smooth plane transversed by the broad horizontal swath of the aluminum marquee. Indicative of postwar movie theater design, four pairs of frameless glass doors were employed as a means of drawing the exterior, and passers-by, inside. Narrow panels with metal strips inlaid in the sidewalk extend into the terrazzo floor of the lobby, providing further visual unification between the exterior and the interior. The lobby walls incorporate rose-colored marble paneling with aluminum-framed, back-lit display cases and cove lighting. Great weight was placed on the fluidity of space created by the glass doors, providing passers-by with multiple images of the lobby and box office area as if they were simply one. Interior and exterior are merged. However, one must wonder why a “good remaining example” here has become a

147See Decision of the Historic Preservation Review Board Re: MacArthur Theater, Case No. 97-2, 2 (June 30, 1997).
148See id. at 1.
149Application for Historic Landmark Designation for MacArthur Theater, 3 (Apr. 10, 1997).
151Application for Historic Landmark Designation for MacArthur Theater at 3.
153Application for Historic Landmark Designation for MacArthur Theater at 2.
standard for interior designation. As one of eleven landmarked interiors in all of Washington, D.C., its designation puts standards for the validity of interior landmarking at risk. It is important that the HPRB remain rigorous in pursuit of the preservation of excellence. It is a bad precedent to designate “good remaining examples,” as most interiors in the city are a good remaining example of something. The HPRB was more diligent in its evaluation of the Avalon Theater’s application for interior designation.

Although featuring an exterior worthy of designation, the Avalon’s interior was deemed unworthy of landmarking. Built in 1922 and located at 5612 Connecticut Avenue, N.W., the Avalon’s exterior reflects a “high-style” example of the neighborhood movie house type in Washington. An attached two-story brick and limestone Classical Revival style structure, the façade typifies 1920s architecture with its flat and ornamental design that is “eclectic, abstract, and restrained.” The first story was adorned with recessed panels and a slightly projecting limestone stringcourse. The upper zone is a symmetrical composition centered on an elaborately detailed tripartite opening trimmed in limestone. Indeed, each section of the tripartite opening is marked by single and paired Corinthian pilasters with smooth limestone shafts. An entablature was embellished with acanthus, ornate leaves, and a wave motif. Even though the exterior of the theater has since been altered, the HPRB found that the Avalon still “conveys its original design and purpose with clarity.”

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156 Id.
157 Application for Historic Landmark Designation for Chevy Chase Theater, 4 (July 26, 1995).
158 Id.
159 Id.
160 Id. at 5.
161 See Decision of the Historic Preservation Review Board Re: Chevy Chase Theater at 3.
ornate cornice, beading, and an applied round modillion with leaves and a central rosette. The area surrounding the movie screen was edged with gilded round rosettes, urns, acanthus, florals, ropes, and horizontal fluting. Flanking the screen were organ wings patterned after Palladian windows and ornamented with Corinthian pilasters and thin Egyptian-style supporting columns. However, even then, as architect Peter Smith notes, all of these interior decorative elements are applied decoration that was the standard pattern book materials of the period. Moreover, in 1984, a renovation rendered the interior even less worthy of interest. The historic detailing of the main lobby has been covered with drywall, with its curved ceiling punched through with wire to support modern electrical equipment. A contemporary concession stand was added. In essence, the Avalon’s façade is an “ornamental surface stuck on the front of a squarish, boxlike lobby with a rectangular, shoeboxlike auditorium behind it.” Lack of integrity and independent significance seem keys in discerning an interior worthy of designation.

While the decision not to designate the Avalon Theater implies that a remodeled interior, inconsistent with the exterior, is grounds for exclusion from interior landmarking, examination of other rejected interiors suggests that the standards for interior designation are even more severe. The 1990 application to landmark the interior

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162 Application for Historic Landmark Designation for Chevy Chase Theater at 6.
163 Id.
164 Id.
165 See Peter H. Smith, Ph.D., Analysis of the Application for the Designation of the Avalon Theater as a Landmark of the National Capital, in STATEMENTS IN OPPOSITION TO THE DESIGNATION OF THE AVALON THEATER AS A D.C. HISTORIC LANDMARK 1, 5 (March 28, 1996).
166 Post-Hearing Memorandum Re: Chevy Chase Theater, 2 (Apr. 18, 1996).
167 Application for Historic Landmark Designation for Chevy Chase Theater at 8.
of the Hillandale Mansion was rejected despite the fact that “the unaltered interior spaces were consistent with the [landmarked] exterior treatment.” The HPRB determined that the interior spaces were not essential to the “understanding” of Italian farmhouse styled Hillandale estate. Since the interior did not separately possess significance beyond that displayed in the exterior, landmarking was not necessary. Interior space must not only be consistent with the style of the landmarked exterior, but it must also augment perspective of the historical character and significance of the exterior. Similarly, attempts to preserve the interior of Washington’s Senator Theater were dismissed even though the interiors retained their original integrity. While landmarking the exterior, the HPRB denied interior designation, stating that the interior surviving with little alteration “alone does not justify designation as an historic landmark.” Again, enhancing the exterior structure supersedes an unaltered state as a criterion for interior designation.

IV: CONCLUSION

Of the fourteen Washington, D.C. interiors examined here, eleven achieved landmark status while three applications were denied. In speculating whether the ratio of acceptances should be improved or whether additional interior sites should be encouraged to seek preservation, it is important to recognize that interior landmarking might well be restrictive to potential changes in use of space. Of the eleven interiors that received designation, ten have continued to function as originally intended, while one, the Equitable-Cooperative Building Association, has made the rather novel switch from banking to housing a nightclub. One would be concerned that too much interior

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170 See id.
designation might force property owners to stick too long with a use no longer ideal. Imagination as well as economic opportunity might well be stifled.

Another issue of concern is the amount of weight to be placed on the availability of public access to interiors. It seems important that the potential for future public viewability exists even if access is not currently available. For example, the Christian Heurich Mansion and Alice Pike Barney Studio House have moved from private residence status to offices of the Historical Society of D.C. and the Smithsonian Museum, respectively. Original use is preserved, and the potential for public access is enhanced. Indeed, it remains an open question whether purely private houses, even those designed by a prominent architect, could be afforded designation.

If present interior landmarking criteria continue, it is not likely that over-designation will occur, yet it is necessary to ensure that rigorous standards apply to future interiors seeking designation. Only ideal properties should be selected that meet qualifications such as the extension and enhancement of the understanding of the historical structure and the seamless presentation of interior and exterior space. In addition, further filtering of otherwise worthwhile candidates can be accomplished by requiring that to achieve landmark status, an interior must be either one-of-a-kind or the epitome of its building type and historical architectural period. While the HPRB ideally seeks to designate the best of the best, unfortunately, often as a result of a development battle, candidates are usually presented one at a time. Without thorough thematic studies, it is difficult to discern what exactly are quintessential examples. Indeed, in the case of apartments where a recent thematic study was funded and conducted by the D.C. Historic Preservation Office, standards are far better defined and, as a result, the interiors selected
are all meritorious. Looking ahead, the HPRB would be well-served by guidance from comprehensive thematic studies. Perhaps the best guidelines for future interior designation policies are articulated by architect Elsa Santoyo, former director of the Office of Historic Preservation at the White House: “a landmark must be notable. It must epitomize design principles. It must not be a typical example nor a modest example, and it cannot be merely characteristic.” If future interior designation policies are shaped by these principles, important historical interiors can be preserved without impinging on flexibility in the evolution of property use. The future eventually becomes the past; interior landmarking must balance current preservation with the freedom to create what may become an historical testament to a future generation.

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