



United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, D.C. 20240



September 21, 2022

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Property: **Washington Hose and Steam Fire Engine Company No. 1 of Conshohocken, 15 West Hector Street, Conshohocken, PA**

Project Number: **43241, Part 2**

Appeal: **1655**

Action: **Final Administrative Decision**

Dear [REDACTED]

I have concluded my review of your appeal of the December 28, 2021 Decision of Technical Preservation Services (TPS), National Park Service, denying certification of the Part 2 – Description of Rehabilitation application for the property cited above (the Decision). The appeal was initiated and conducted in accordance with Department of the Interior regulations [36 C.F.R. part 67] governing certifications for federal income tax incentives for historic preservation as specified in the Internal Revenue Code. I thank your representatives, [REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED] for meeting with me via videoconference on April 1, 2022.

After careful review of the complete record for this project, including the materials presented as part of your appeal and subsequently submitted at my request, I have determined that the impact of the nearly complete adjacent new construction and rehabilitation of the Washington Hose and

Steam Fire Engine Company No. 1 of Conshohocken significantly compromises the historic character of the property, and hereby affirm the denial of certification issued by TPS in the Decision.

The Washington Hose and Steam Fire Engine Company No. 1 was constructed in 1878 as a three-bay, two-story, brick structure with two apparatus bays flanking a centered entrance. It was modified in 1883, with addition of a stable on the west side and construction of the Conshohocken Borough Hall, and enlarged to its current massing in 1908 with the conversion of the stable to a third, wider, apparatus bay, and the construction of a third story and a 3½-story bell tower. The original two apparatus bays and centered entrance were replaced with two wider apparatus bay doors in 1928. In 1962 a one-story addition was constructed adjacent to the bell tower to provide additional apparatus bays. A new firehouse fronting on West Elm Street was constructed on the rear wall of the historic firehouse before 1985 and was enlarged in 2007; that firehouse remains in active use. The property was individually listed in the National Register of Historic Places in 1975; the boundary being the footprint of the 1908 building and 1962 addition.

In 1968, an Urban Renewal Plan was adopted for a four-square block area of downtown Conshohocken bounded by West Elm, Fayette, First, and Oak Streets. West Hector and Forrest Streets were internal to the redevelopment parcel. The Montgomery County Redevelopment Authority purchased the twenty-five-acre parcel in 1974 and a 1980 aerial photograph shows that the site had been cleared for redevelopment with the exception of the Conshohocken Borough Hall, the National Register-listed firehouse property, and the adjacent First National Bank of Conshohocken at the corner of West Hector and Fayette Streets. A portion of the cleared land was deeded to Washington Hose in 1992 for the construction of its new firehouse. The redevelopment in the 1980s including vacating West Hector Street east of the 1908 building, conversion of the vacated right-of-way to a public plaza, and construction of office buildings and a parking garage along First and Oak Streets.

This proposed rehabilitation will convert the 1908 firehouse to the entrance, reception lobby, bar, and dining rooms for a new hotel, the 1962 addition will be demolished and replaced by a multi-story connector between the 1908 firehouse and the taller mass of the new hotel. Prior to the start of the project, the historic firehouse, 1962 addition, and vacant east lot (bounded by both firehouses, West Elm and Fayette Streets, and the former right-of-way of Hector Street) were controlled by a combination of the Borough and the Redevelopment Authority. The entire redevelopment parcel recently has been divided into two condominiums with some areas under common ownership. Concord Hospitality rehabilitated the 1908 firehouse, demolished its 1962 addition to construct the connecting building, and constructed the new hotel on the vacant lot along Fayette Street, all now close to completion. Keystone Development + Investment, demolished the structures on First and Oak Streets, the public plaza, and the remnant of Hector Street in front of the firehouse for new construction, all substantially complete. Consequently,



the rehabilitation of the firehouse is significantly impacted by adjacent, attached, and related new construction.

In its Decision, TPS identified two significant denial issues:

*The location, massing, size, and scale of the three-story addition do not meet Standard 9, which requires that new additions be compatible with the location, massing, size, scale, and architectural features to protect the historic integrity of a property and its environment; and Standard 10, which requires that the essential form and integrity of an historic property and its environment be preserved. The addition is not accessory and subordinate to the historic building. Its first floor is set at the plane of the firehouse facade and includes a canopy that projects what appears to be at least one full bay beyond the plane of the facade. This canopy serves as a deck at the second-floor level, creating usable exterior space projecting beyond the facade of the firehouse. The inclusion of a third story of mechanical units and screening, which should have been located away from the historic building, further diminishes the historic appearance and character of the firehouse.*

And further noted:

*The larger development removes the remaining street, aggregates the surrounding land into a superblock, and places a landscaped public plaza and lawn in front of the firehouse, now reached by walkways. The larger development overwhelms the historic firehouse in mass, size, scale, and appearance. The placement of the plaza and lawn obliterates all sense of the firehouse as an historic building on an urban street. This treatment of the firehouse in the context of the larger development also fails, in and of itself, to meet Standards 9 and 10.*

Although this is an appeal of a Part 2 application, construction was well underway at the time of the TPS review and is now substantially complete; the hotel is accepting room reservations for November. TPS noted in the Decision that “owners who undertake rehabilitation projects without prior approval by the NPS do so strictly at their own risk.”

The connector building is constructed on the site of the 1962 addition, demolished in 2019 as part of the current project. The addition was only thirteen years old at the time of the National Register listing and not seen as contributing to the architectural significance of the older building, but nevertheless was included within the boundary of the property listing. Although the addition was fifty-seven years old at the time of its demolition, there is no evidence in the project file that it was evaluated as potentially having acquired significance in its own right.

Instead, its 2019 demolition was justified on the basis of a 1988 opinion by the Pennsylvania SHPO that *“it is not necessary to remove the apparatus building (nee 1962 addition) from the National Register in order to proceed with demolition.”* Consequently, the demolition without further review potentially violated Standard 4, which states, *“Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.”* Further, despite being demolished, the site of the 1962 addition remains part of the National Register property.

The massing and scale of the connector building is deferential to the massing and scale of the 1908 firehouse. It is primarily two stories in height with the second floor set back and a rooftop mechanical enclosure less than a full story in height set back even further, both a sufficient distance from the façade of the adjacent firehouse to not be prominent features. Thus, I disagree with TPS that the connector building is three stories in height and that the mechanical equipment diminishes the historic appearance and character of the firehouse. However, I concur with TPS that the first-floor façade of the connector building, set in line with the façade of the firehouse, and the projecting balcony and tall railing for a second-floor deck are all prominent features that detract from and diminish the historic character of the firehouse.

Your stated inspiration for the projecting balcony was the cantilevered canopy on the 1962 addition. The 1962 addition, following the slope of Hector Street, was set at a lower elevation than the firehouse. However, the first floor of the connector building is level with the 1908 firehouse, which required the new balcony to be set higher than the historic canopy. Its vertical depth is substantially greater than the canopy because it carries the dead and live load of the cantilevered deck, and it projects far beyond the canopy. Recent photographs and dimensions given in the architectural drawings show that the balcony structure is 1'-8" high, with a 5'-0" tall glass railing with a shelf for drinks and a LED light strip set 18" below the top rail. Thus, the balcony and railing, 6'-8" tall overall, and projecting approximately 6'-0" beyond the façade of the firehouse, more than doubles the dimensions and proportions of the historic canopy. Consequently, it is a visually prominent feature that is not compatible with or deferential to the massing, size, scale, and architectural features of the historic firehouse, contravening Standard 9. In addition, the first floor is red brick closely matching the brick firehouse and the glazed large opening matches the proportions (but over-scaled) of the 1962 apparatus door that used to be in that location. Although the design may have been intended to be compatible with the historic building, the effect creates a false sense of history, implying that the connector building incorporates portions of the demolished 1962 addition, contravening Standard 3. Standard 9 states, *“New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.”* Standard 3 states, *“Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense*



*of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.”* However, I note my disagreement with TPS that the connector building violates Standard 10 because if it were to be removed in the future, the essential form and integrity of the 1908 firehouse would be unimpaired. Standard 10 states, *“New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.”*

The historic environment surrounding the firehouse had been significantly compromised by the 1980s redevelopment, which demolished the Borough Hall on its west side, demolished the bank building on the east side of the 1962 addition, and eliminated West Hector Street, constructing a public plaza in its place, albeit with a paved cul-de-sac in front of the 1908 firehouse. However, the related new redevelopment of the overall site by Keystone Development + Investment has further diminished the historic environment of the firehouse by removing the remaining section of Hector Street and sidewalk in front of the firehouse and extending the landscape features of the new plaza to the face of the firehouse, eliminating the last vestiges of the property’s historic environment. And the slope of Hector Street down to Fayette Street has been reversed so that the new plaza slopes upward slightly from the level of the firehouse before dropping sharply at the Fayette Street sidewalk. The result is that the east end of the new plaza is now ten steps above the Fayette Street sidewalk, and the first floor of the hotel (extended at the same floor level as the 1908 firehouse) is a full story above grade. In addition, the rigid geometry of the plaza paving is slightly angled from the firehouse façade, creating an awkward joint where the two meet. Consequently, the firehouse is now totally devoid of its historic context, contravening Standard 1 and Standard 9, cited above. Standard 1 states, *“A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.”* Further, even if the new plaza were removed and the Hector Street right-of-way were regraded in the future, the historic environment has been irreversibly lost, contravening Standard 10, cited above.

Although the TPS Decision stated that the *“treatment of the garage doors and the interior treatments have been modified to meet the Standards and do not factor into this denial of certification,”* this review considered different changes made to the firehouse interior. The regulations state, *“The Chief Appeals Officer may base his decision in whole or part on matters or factors not discussed in the decision appealed from.”* [36 C.F.R. 67.10(c)]. The new use as amenity spaces for the hotel creates a circulation pattern parallel to the street façade, i.e. from party wall to party wall, perpendicular to the historic access through the front façade, requiring large openings to be cut in the side walls. A new entrance and canopy for vehicular and pedestrian access are added on the west side where the Borough Hall used to be located. Consequently, the new use abandons the historic street façade as the main entrance to the firehouse, even closing and sealing off the bell tower entrance door. The apparatus doors will

remain but will be fixed in place because the overhead door tracks will be used for mounting track lights. A bar will fill the west apparatus bay. The second floor, originally two parlors and a dormitory room, will become dining rooms accessed from the connector building through two former window openings on the west wall of the firehouse. The historic parlor chandeliers will remain but will be surrounded by suspended planting troughs, which are visually intrusive and compromise the historic character of the spaces. The third-floor dance hall will be preserved but disused in part because of significant access and egress issues. Although each of these changes individually are minor, their cumulative impact significantly alters the way in which the building was used historically, alters its historic character, and causes the interior treatments to contravene Standard 1, cited above.

Consequently, I have determined that the overall impact of the proposed but substantially complete adjacent, attached, and related new construction on the rehabilitation of the Washington Hose and Steam Fire Engine Company No. 1 has significantly compromised the historic character of the property, its site and environment, and thus fails to meet the Standards. I hereby affirm TPS's December 28, 2021 Decision.

As the Department of the Interior regulations state, my decision is the final administrative decision with respect to TPS's December 28, 2021 Decision regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,



John A. Burns, FAIA, FAPT  
Chief Appeals Officer  
Cultural Resources

cc: PA SHPO  
IRS

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]