

MONTGOMERY COUNTY HISTORIC PRESERVATION COMMISSION
STAFF REPORT

Address:	12 E. Lenox St., Chevy Chase	Meeting Date:	12/4/2019
Resource:	Contributing Resource Chevy Chase Village Historic District	Report Date:	11/27/2019
Applicant:	Justin and Elizabeth Bausch (Ben Van Dusen, Architect)	Public Notice:	11/20/2019
Review:	HAWP	Tax Credit:	n/a
Case Number:	35/13-19TT	Staff:	Dan Bruechert
PROPOSAL:	Porch Modifications		

STAFF RECOMMENDATION

Staff recommends the HPC **approve with one (1) condition** the HAWP application:

1. The stair risers, treads, and decking need to be constructed out of wood. The HPC delegates final approval authority to Staff to confirm this condition has been met.

ARCHITECTURAL DESCRIPTION

SIGNIFICANCE: Contributing Resource within the Chevy Chase Historic District
 STYLE: Colonial Revival
 DATE: 1908

The subject property is a Colonial Revival house, three bays wide, with a hipped roof and broad overhangs. There is a large cantelevered bay to the east and a tall privacy fence along Brookville Rd.



Figure 1: Photo of the house c.1910s showing its historic appearance.

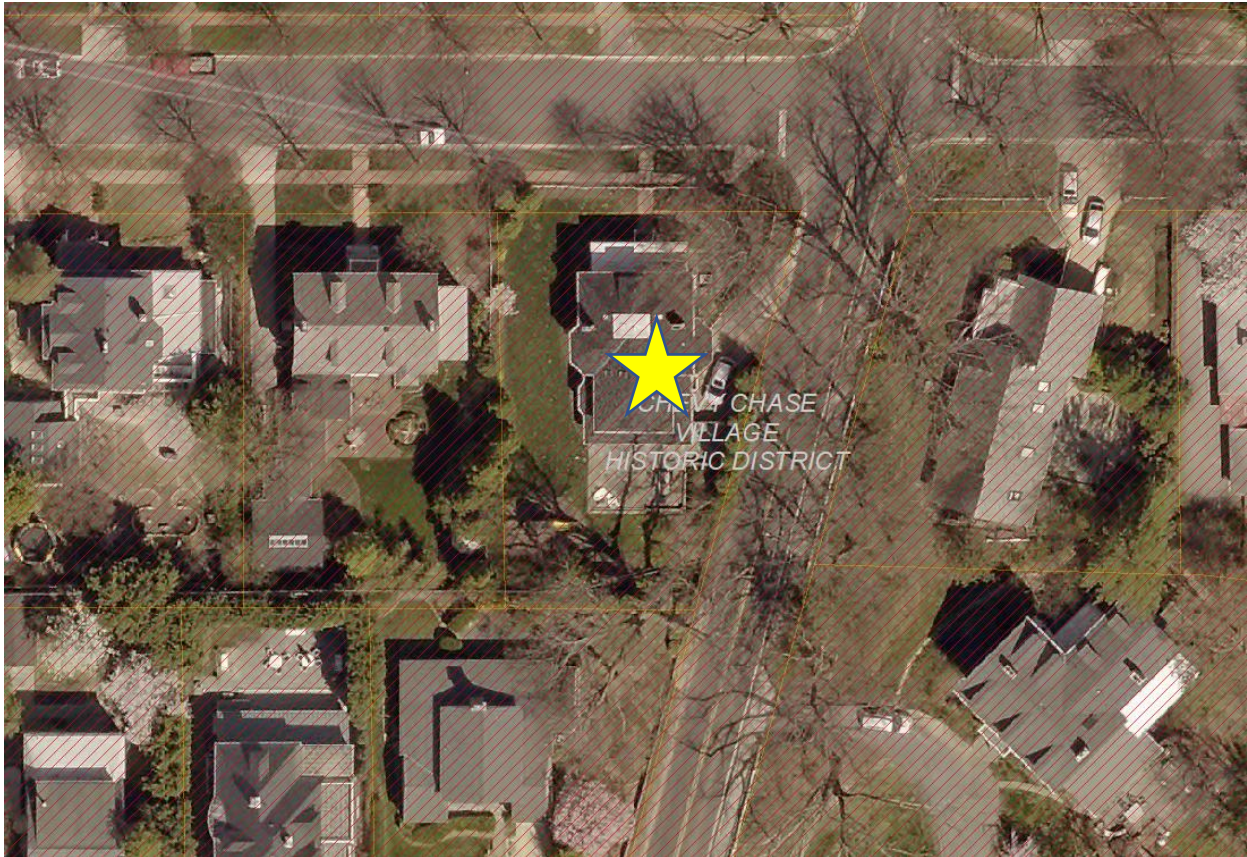


Figure 2: 12 E. Lenox is at the corner of Lenox and Brookeville Rd. near the edge of the Chevy Chase Village Historic District.

BACKGROUND

The HPC held a preliminary consultation focused on the proposed porch modifications and a side-projecting addition and swimming pool at the March 27, 2019 HPC.¹ While the HPC recommended significant revisions regarding the size and placement of the addition, they were generally supportive of the porch modifications.

The applicant returns for a Historic Area Work Permit only for work on the front porch.

PROPOSAL

The applicant proposes to remove the non-code compliant front stairs and to replace the columns and install a new railing.

APPLICABLE GUIDELINES

When reviewing alterations and new construction within the Chevy Chase Village Historic District several documents are to be utilized as guidelines to assist the Commission in developing their decision. These documents include *Montgomery County Code Chapter 24A (Chapter 24A)*, the *Chevy Chase Historic District Design Guidelines (Guidelines)*, and the *Secretary of the Interior's Standards for Rehabilitation (Standards)*. The pertinent information in these documents is outlined below.

¹ The previous Staff Report can be found here: <https://montgomeryplanning.org/wp-content/uploads/2019/03/II.A-12-E.-Lenox-Street-Chevy-Chase.pdf>, with audio of the hearing here: http://mncppc.granicus.com/MediaPlayer.php?publish_id=c6796337-56ea-11e9-ae3-0050569183fa.

Chevy Chase Village Historic District Guidelines

The *Guidelines* break down specific projects into three levels of review - Lenient, Moderate and Strict Scrutiny.

“Lenient Scrutiny” means that the emphasis of the review should be on issues of general massing and scale, and compatibility with the surrounding streetscape, and should allow for a very liberal interpretation of preservation rules. Most changes should be permitted unless there are major problems with massing, scale or compatibility.

“Moderate Scrutiny” involves a higher standard of review than “lenient scrutiny.” Besides issues of massing, scale and compatibility, preserving the integrity of the resource is taken into account. Alterations should be designed so that the altered structure still contributes to the district. Use of compatible new materials, rather than the original building materials, should be permitted. Planned changes should be compatible with the structure’s existing design, but should not be required to replicate its architectural style.

“Strict Scrutiny” means that the planned changes should be reviewed to insure that the integrity of the significant exterior architectural or landscaping features and details is not compromised. However, strict scrutiny should not be “strict in theory but fatal in fact” i.e. it does not mean that there can be no changes but simply that the proposed changes should be reviewed with extra care.

- Balconies should be subject to moderate scrutiny if they are visible from the public right-of-way, lenient scrutiny if they are not.
 - Decks should be subject to moderate scrutiny if they are visible from the public right-of-way, lenient scrutiny if they are not
 - Exterior trim (such as moldings on doors and windows) on contributing resources should be subject to moderate scrutiny if it is visible from the public right-of-way, lenient scrutiny if it is not. Exterior trim on Outstanding resources should be subject to strict scrutiny if it is visible from the public right-of-way.
 - Lot coverage should be subject to strict scrutiny, in view of the critical importance of preserving the Village’s open park-like character.
 - Porches should be subject to moderate scrutiny if they are visible from the public right-of-way, lenient scrutiny if they are not. Enclosures of existing side and rear porches have occurred throughout the Village with little or no adverse impact on its character, and they should be permitted where compatibly designed.
 - Siding should be subject to moderate scrutiny if it is visible from the public right-of-way, lenient scrutiny if it is not.
- The *Guidelines* state five basic policies that should be adhered to, including:
 - Preserving the integrity of the Chevy Chase Village Historic District. Any alterations should, at a minimum, perpetuate the ability to perceive the sense of time and place portrayed by the district.
 - Preserving the integrity of contributing structures. Alterations to should be designed in such a way that the altered structure still contributes to the district.
 - Maintaining the variety of architectural styles and the tradition of architectural excellence.
 - Design review emphasis should be restricted to changes that will be visible from the front or side public right-of-way, or that would be visible in the absence of vegetation or landscaping.
 - Alterations to the portion of a property that are not visible from the public-right-of-way should be subject to a very lenient review. Most changes to the rear of the properties should be approved as a matter of course.

Montgomery County Code; Chapter 24A-8

- (b) The commission shall instruct the director to issue a permit, or issue a permit subject to such conditions as are found to be necessary to insure conformity with the purposes and requirements of this chapter, if it finds that:
 - (1) The proposal will not substantially alter the exterior features of an historic site or historic resource within an historic district; or
 - (2) The proposal is compatible in character and nature with the historical, archeological, architectural or cultural features of the historic site or the historic district in which an historic resource is located and would not be detrimental thereto or to the achievement of the purposes of this chapter; or
- (d) In the case of an application for work on an historic resource located within an historic district, the commission shall be lenient in its judgment of plans for structures of little historical or design significance or for plans involving new construction, unless such plans would seriously impair the historic or architectural value of surrounding historic resources or would impair the character of the historic district.

Secretary of Interior's Standards for Rehabilitation

- 2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
- 5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
- 9. 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.
- 10. 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.

STAFF DISCUSSION

The applicant proposes remove the existing front stairs and install new, code-compliant stairs, new columns, and a new railing.

The original front porch had a bowed front with a brick wall and side-loading stairs. This configuration can be seen in the historic photo shown in Fig. 1 and Fig. 3. The porch columns had embellished bases and were supported by square pediments. The porch was changed to its current appearance sometime prior to 1927 (see the Sanborn Map in Fig. 3).

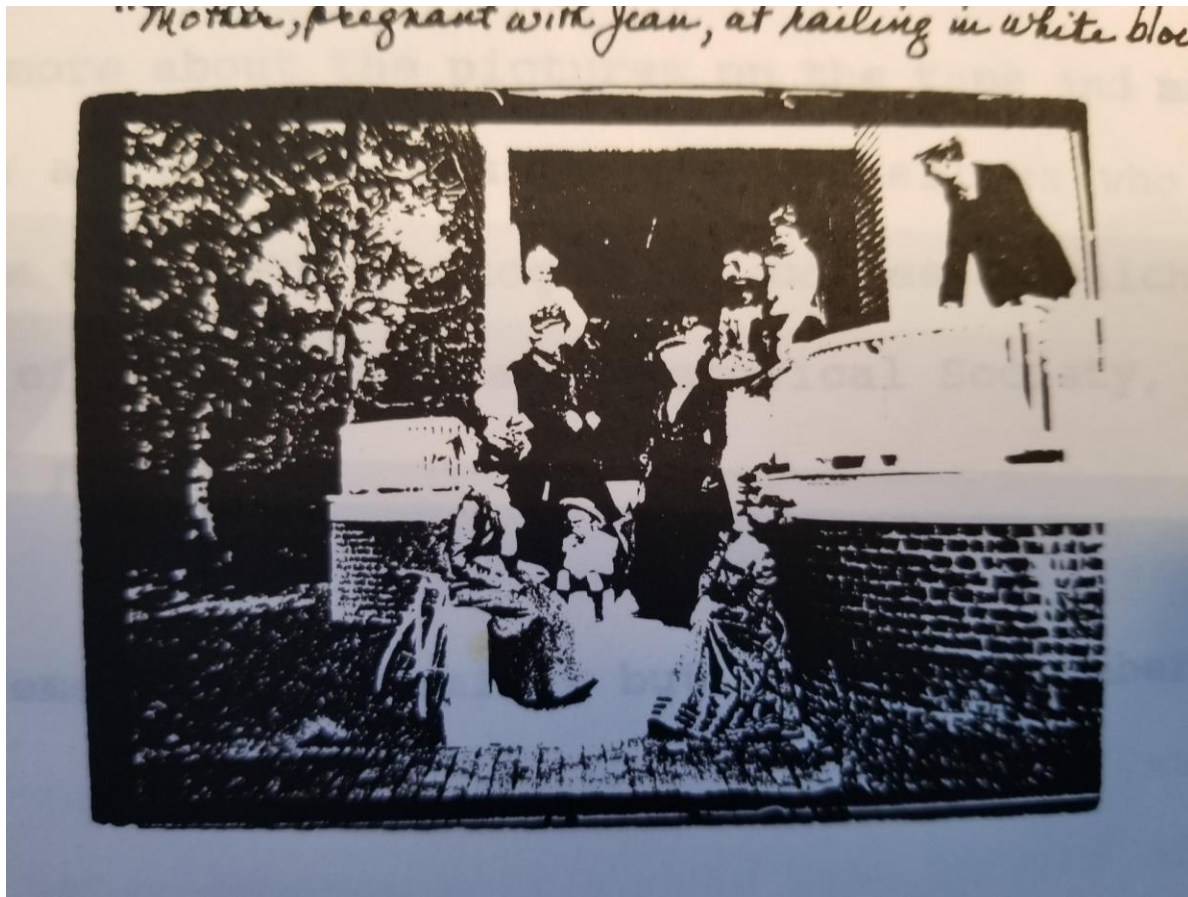


Figure 3: Historic photo showing the front porch in its historic configuration.

The existing front porch steps are wood and are too steep to meet current code. The applicant proposes a new set of code-compliant steps, which will add an additional riser and will project an additional 1' (one foot) into the front yard. The applicant proposes to construct the stair risers and treads in Azek composite. The first step will be constructed out of brick to match the existing porch piers. The applicant proposes to install new full-height, wood ionic columns in place of the existing wood tapered columns on wood pedestals. The column spacing will match the current configuration. The last proposed change is the replacement of the existing wood railing with a code-compliant wood railing in the porch and a balustrade above. Staff finds the proposed work is compatible with the Chapter 24A and the *Design Guidelines* and recommends approval.

Staff finds that as the existing steps are not original to the house, they may be removed and replaced. Staff finds the current configuration is appropriate to the character of the house and the extension of the stairs by 1' (one foot) will not substantially alter the appearance of the house. The applicant proposes to remove the wood in the stairs and porch decking and replace them with Azek composite. Azek is millable and paintable and has been approved in limited circumstances in the Chevy Chase Village Historic District. Usually, these materials have been allowed for trim work or elements where the visual character is paramount, and the physical characteristics are less important. In this instance, the treads, risers, and decking are evaluated for their visual *and* physical character, because they will be touched on a regular basis. Staff does not find Azek to be physically compatible with wood due to its inability to wear and develop a patina. Staff recommends the HPC add a condition for approval that the stair risers, tread, and decking needs to be wood which would be compatible with 24A-8(b)(2). Staff recommends the HPC delegates final approval authority to Staff to determine this condition has been met.

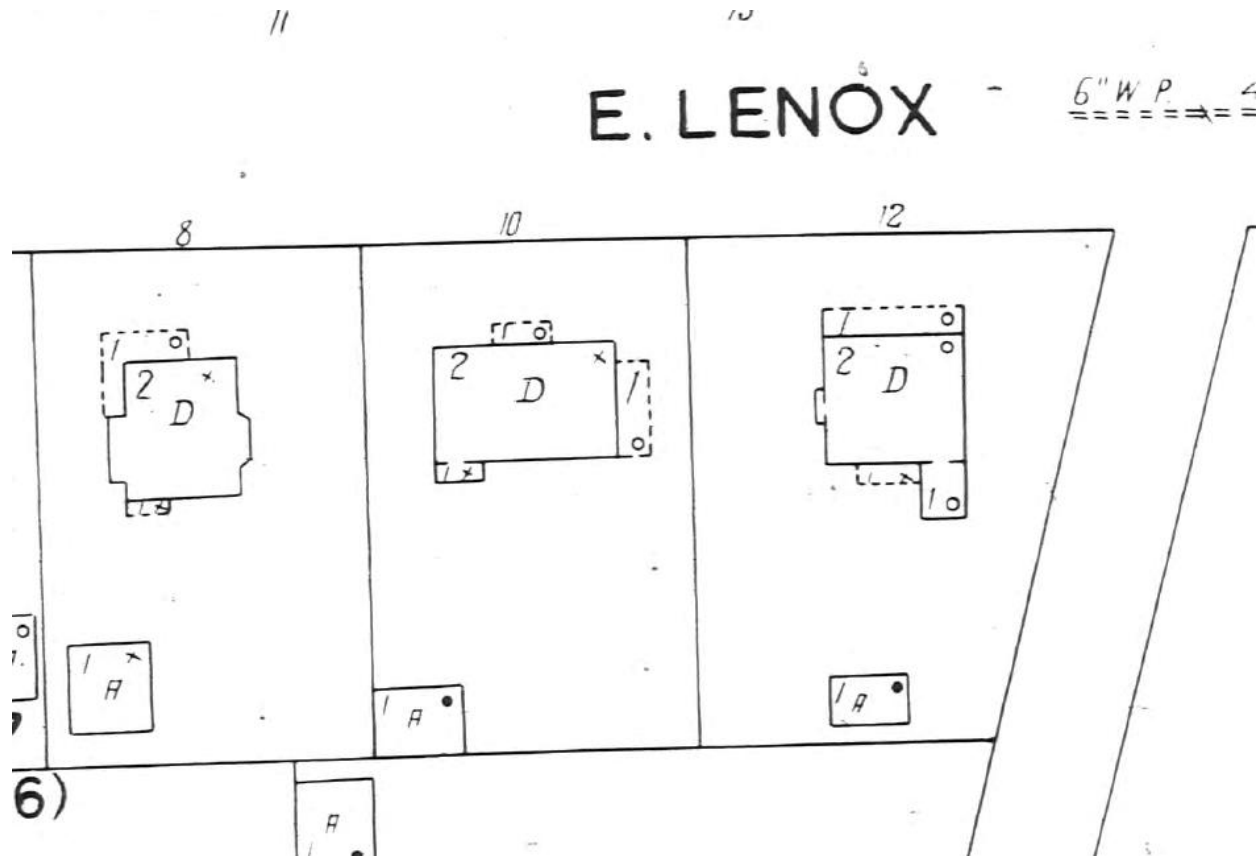


Figure 4: Detail of 1927 Sanborn map showing the reconfigured full-width front porch on 12 E. Lenox.

The existing columns are not original to the house, though their dimensions appear to be relatively consistent with the dimensions shown in the historic photograph (Fig. 1). The railing for the front porch aligns with the 24" (twenty-four inch) height of the pedestals. This dimension is a full 12" (twelve inches) lower than what is required by code. The applicant proposes replacing the existing columns and railings and replacing them with new wood columns and a traditionally designed wood railing. The property owner, the architect, and Staff worked through a number of design permutations to determine the best appearance for this new configuration (the designs can be seen in last page of the application). Three different design schemes were evaluated. Scheme A retained the columns and pedestals but installed new a code-complaint railing. This created the appearance of the top rail hanging 12" (twelve inches) in the air. Because this scheme retained the pedestals and columns Staff would have supported approval of Scheme A. Scheme B replaced the existing pedestals and installed new 36" (thirty-six inch) tall pedestals that matched the height of the new railing. Staff determined that enlarging the pedestals would shrink the column height and would make the porch appear 'squatter;' and did not find this to be as compatible as the other schemes. Scheme C, would install full-height columns with the 36" (thirty-six inch) railing engaged directly into the columns. Staff found that this scheme would best accentuate the vertical proportions of the porch while integrating the railing. Staff supports approval of the proposed replacement wood columns and railings shown in drawings 2, 3, and 4.

Above the porch, the applicant proposes installing a 28" (twenty-eight inch) tall wood balustrade, with pedestals spaced above the porch columns. The historic photograph, Fig. 1, shows that there was a historic balustrade in this location. The original balustrade had some type of corner finial (possibly be pinecones or acorns or urns), but there isn't sufficient detail to make a determination. This balustrade was

removed but we do not have a date for that removal. Staff finds that there is a historical precedent for a balustrade in this location, and finds the materials and design are compatible with the period of construction and with the design of the house. Staff supports approval under 24A-8(b)(2), the *Design Guidelines*.

STAFF RECOMMENDATION

Staff recommends that the Commission **approve with one (1) condition** the HAWP application:

1. The stair risers, treads, and decking need to be constructed out of wood. The HPC delegates final approval authority to Staff to confirm this condition has been met; under the Criteria for Issuance in *Chapter 24A-8(b)(2)*, having found that the proposal will not substantially alter the exterior features of the historic resource and is compatible in character with the district and the purposes of *Chapter 24A*; the *Design Guidelines*; and with the *Secretary of the Interior's Standards for Rehabilitation #2 and #10*,

and with the general condition that the applicant shall present the **3 permit sets of drawings, if applicable, to Historic Preservation Commission (HPC) staff for review and stamping** prior to submission for the Montgomery County Department of Permitting Services (DPS) building permits;

and with the general condition that final project design details, not specifically delineated by the Commission, shall be approved by HPC staff or brought back to the Commission as a revised HAWP application at staff's discretion;

and with the general condition that the applicant shall notify the Historic Preservation Staff if they propose to make **any alterations** to the approved plans. Once the work is completed the applicant will **contact the staff person** assigned to this application at 301-563-3400 or dan.bruechert@montgomeryplanning.org to schedule a follow-up site visit.



DPS - #8

HISTORIC PRESERVATION COMMISSION
301/563-3400**APPLICATION FOR
HISTORIC AREA WORK PERMIT**

benvevandusenarchitects.com Contact Person: **BEN VANDUSEN**
Contact Email: _____ Daytime Phone No.: **202-332-3890**
Tax Account No.: _____
Name of Property Owner: **JUSTIN & ELIZABETH BAUSCH** Daytime Phone No.: _____
Address: **12 E. LENOX ST.** **CHEVY CHASE, MD** **20815**
Street Number City State Zip Code
Contractor: **N/A** Phone No.: _____
Contractor Registration No.: _____
Agent for Owner: **BEN VANDUSEN** Daytime Phone No.: **202-332-3890**

LOCATION OF BUILDING/PREMISE

House Number: **12** Street: **E. LENOX ST.**
Town/City: **CHEVY CHASE VILLAGE** Nearest Cross Street: **BROOKVILLE RD**
Lot: **17 & 16 & 18** Block: **36** Subdivision: **CHEVY CHASE VILLAGE**
Liber: _____ Folio: _____ Parcel: **PLAT REFERENCE : 2/106**

PART ONE: TYPE OF PERMIT ACTION AND USE**1A. CHECK ALL APPLICABLE:**

- ☒ Construct ☒ Extend ☒ Alter/Renovate
☐ Move ☐ Install ☐ Wreck/Raze
☐ Revision ☐ Repair ☐ Revocable

CHECK ALL APPLICABLE:

- ☒ A/C ☒ Slab ☒ Room Addition ☒ Porch ☐ Deck ☒ Shed
☐ Solar ☒ Fireplace ☐ Woodburning Stove ☒ Single Family
☐ Fence/Wall (complete Section 4) ☐ Other: **POOL**

1B. Construction cost estimate: \$ _____

1C. If this is a revision of a previously approved active permit, see Permit # _____

PART TWO: COMPLETE FOR NEW CONSTRUCTION AND EXTEND/ADDITIONS

2A. Type of sewage disposal: 01 ☒ WSSC 02 ☐ Septic 03 ☐ Other: _____
2B. Type of water supply: 01 ☒ WSSC 02 ☐ Well 03 ☐ Other: _____

PART THREE: COMPLETE ONLY FOR FENCE/RETAINING WALL3A. Height **1** feet **6** inches

3B. Indicate whether the fence or retaining wall is to be constructed on one of the following locations:

- ☐ On party line/property line ☒ Entirely on land of owner ☐ On public right of way/easement

I hereby certify that I have the authority to make the foregoing application, that the application is correct, and that the construction will comply with plans approved by all agencies listed and I hereby acknowledge and accept this to be a condition for the issuance of this permit.

Signature of owner or authorized agent

2/27/19

Date

Approved: _____ For Chairperson, Historic Preservation Commission

Disapproved: _____ Signature: _____ Date: _____

Application/Permit No.: _____ Date Filed: _____ Date Issued: _____

Edit 6/21/99

SEE REVERSE SIDE FOR INSTRUCTIONS

**THE FOLLOWING ITEMS MUST BE COMPLETED AND THE
REQUIRED DOCUMENTS MUST ACCOMPANY THIS APPLICATION.**

1. WRITTEN DESCRIPTION OF PROJECT

- a. Description of existing structure(s) and environmental setting, including their historical features and significance:

#12 E. LENOX ST IN CHEVY CHASE VILLAGE, BUILT IN 1899,
SITS AT THE SW CORNER OF BROOKVILLE RD. SITING OF THE
HOUSE IS SKEWED EAST AND NORTH, LEAVING GENEROUS
WEST AND SOUTH (REAR) YARDS. COLONIAL REVIVAL IN STYLE
W/ HIP ROOF AND BROAD OVERHANGS. DISTINCTIVE FEATURES
INCLUDE THE COVERED FRONT PORCH, ORIGINAL DOUBLE-HUNG
WINDOWS AND A LARGE 2ND FL. GANTILEVERED BAY AT THE
EAST ELEVATION. A SUBSTANTIAL 2-STORY ADDITION WAS ADDED

IN 2003

- b. General description of project and its effect on the historic resource(s), the environmental setting, and, where applicable, the historic district:

RENOVATION OF THE FRONT PORCH & REBUILDING OF FRONT
STEPS FOR SAFETY & CODE COMPLIANCE.

2. SITE PLAN

Site and environmental setting, drawn to scale. You may use your plat. Your site plan must include:

- a. the scale, north arrow, and date;
- b. dimensions of all existing and proposed structures; and
- c. site features such as walkways, driveways, fences, ponds, streams, trash dumpsters, mechanical equipment, and landscaping.

3. PLANS AND ELEVATIONS

You must submit 2 copies of plans and elevations in a format no larger than 11" x 17". Plans on 8 1/2" x 11" paper are preferred.

- a. Schematic construction plans, with marked dimensions, indicating location, size and general type of walls, window and door openings, and other fixed features of both the existing resource(s) and the proposed work.
- b. Elevations (facades), with marked dimensions, clearly indicating proposed work in relation to existing construction and, when appropriate, context. All materials and fixtures proposed for the exterior must be noted on the elevations drawings. An existing and a proposed elevation drawing of each facade affected by the proposed work is required.

4. MATERIALS SPECIFICATIONS

General description of materials and manufactured items proposed for incorporation in the work of the project. This information may be included on your design drawings.

5. PHOTOGRAPHS

- a. Clearly labeled photographic prints of each facade of existing resource, including details of the affected portions. All labels should be placed on the front of photographs.
- b. Clearly label photographic prints of the resource as viewed from the public right-of-way and of the adjoining properties. All labels should be placed on the front of photographs.

6. TREE SURVEY

If you are proposing construction adjacent to or within the dripline of any tree 6" or larger in diameter (at approximately 4 feet above the ground), you must file an accurate tree survey identifying the size, location, and species of each tree of at least that dimension.

7. ADDRESSES OF ADJACENT AND CONFRONTING PROPERTY OWNERS

For ALL projects, provide an accurate list of adjacent and confronting property owners (not tenants), including names, addresses, and zip codes. This list should include the owners of all lots or parcels which adjoin the parcel in question, as well as the owner(s) of lot(s) or parcel(s) which lie directly across the street/highway from the parcel in question.

PLEASE PRINT (IN BLUE OR BLACK INK) OR TYPE THIS INFORMATION ON THE FOLLOWING PAGE.
PLEASE STAY WITHIN THE GUIDES OF THE TEMPLATE, AS THIS WILL BE PHOTOCOPIED DIRECTLY ONTO MAILING LABELS.

Owner's Mailing Address

Justin & Elizabeth Bausch
12 E. Lenox St.
Chevy Chase, MD 20815

Adjacent & Confronting Neighbors:

Marjorie Zapruder
10 E. Lenox St.
Chevy Chase, MD 20815

Anna Niceta & Thomas Lloyd
15 E. Lenox St.
Chevy Chase, MD 20815

Sam Lawrence
100 E. Lenox St.
Chevy Chase, MD 20815

Britt & Kelleen Snider
11 E. Lenox St.
Chevy Chase, MD 20815

Mr. & Mrs. Michael Kail
101 E. Lenox St.
Chevy Chase, MD 20815

Chris & Kathleen Matthews
11 E. Kirke St.
Chevy Chase, MD 20815

Chris & Kathleen Matthews (or Neighbor)
9 E. Kirke St.
Chevy Chase, MD 20815

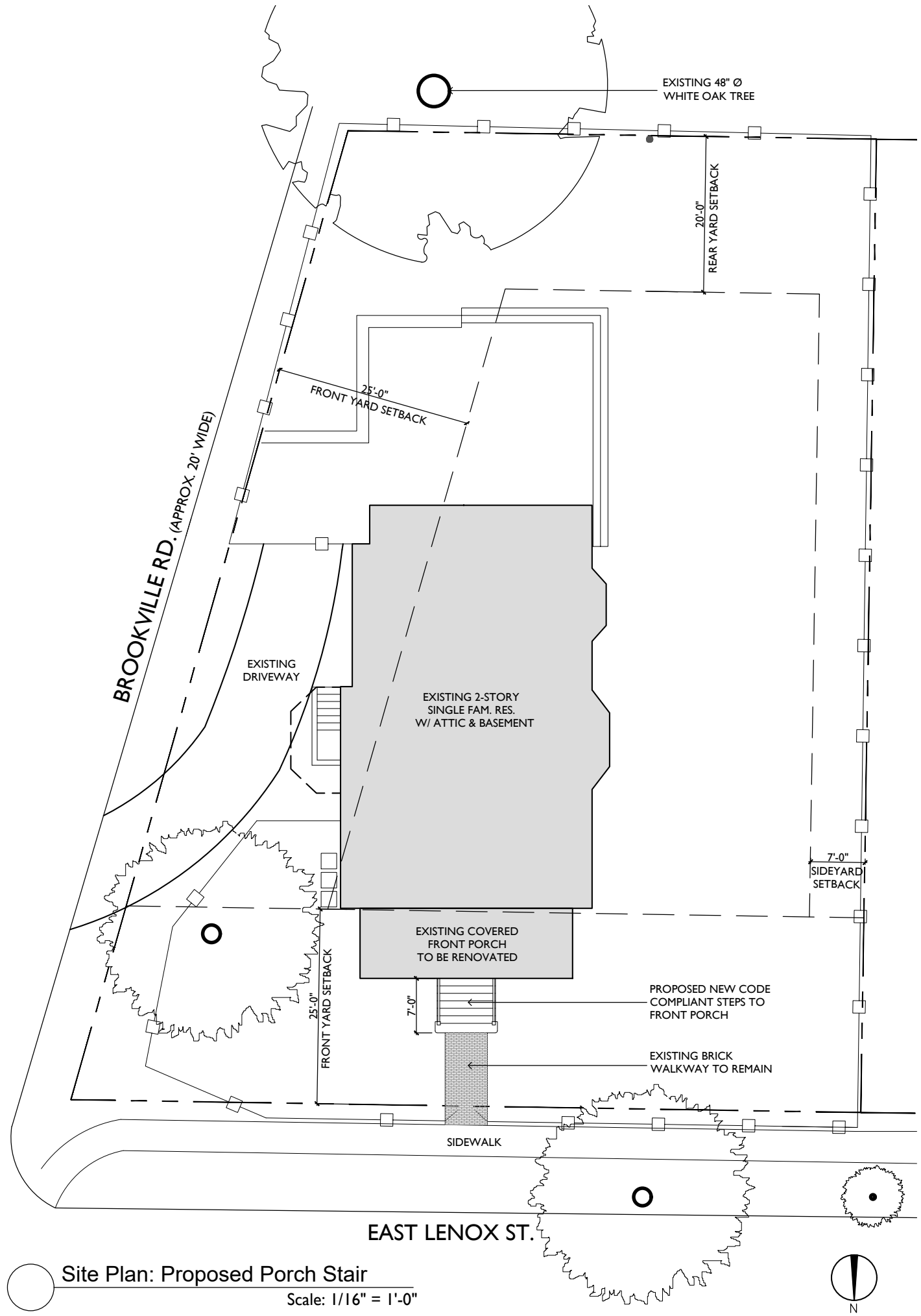
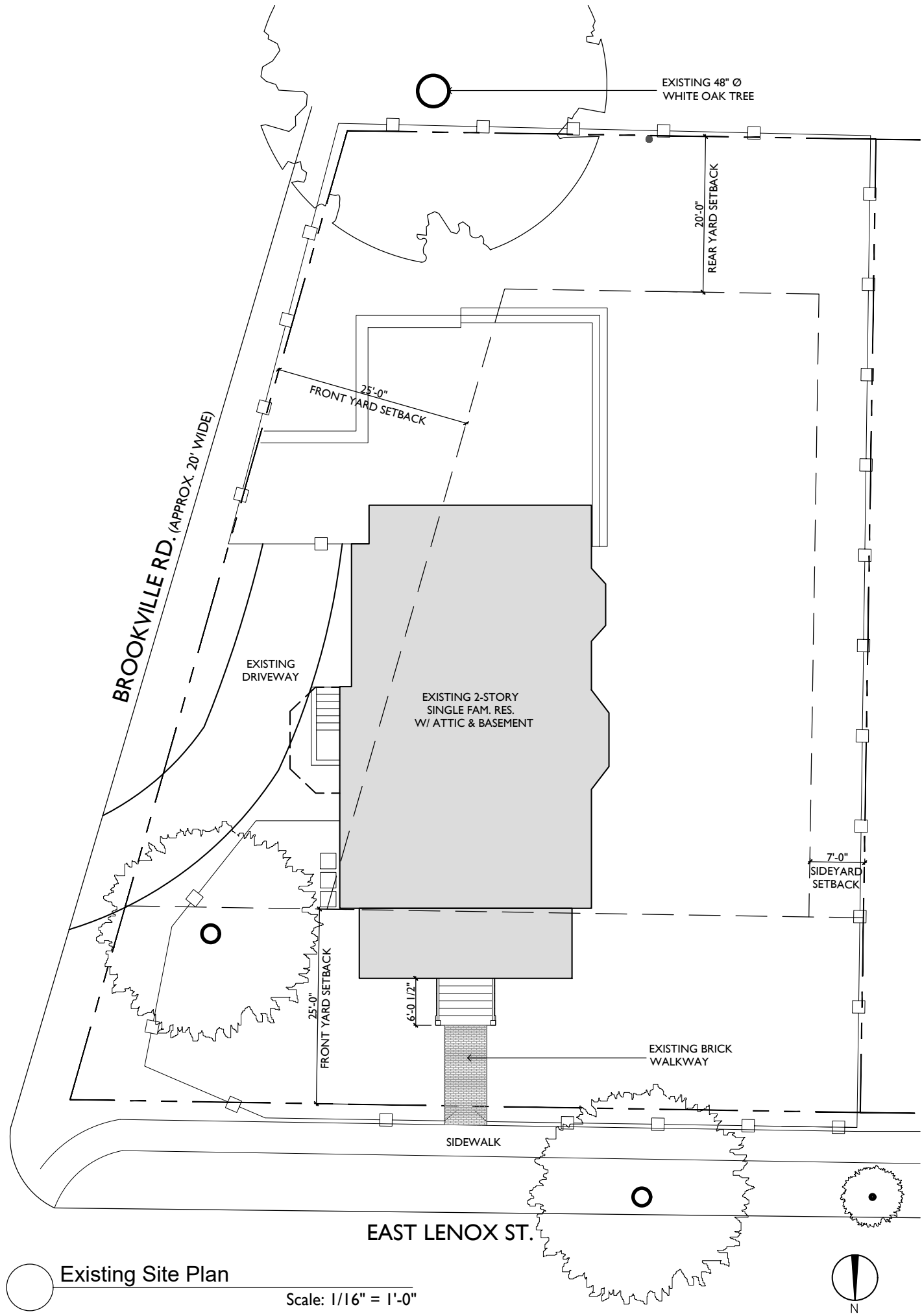








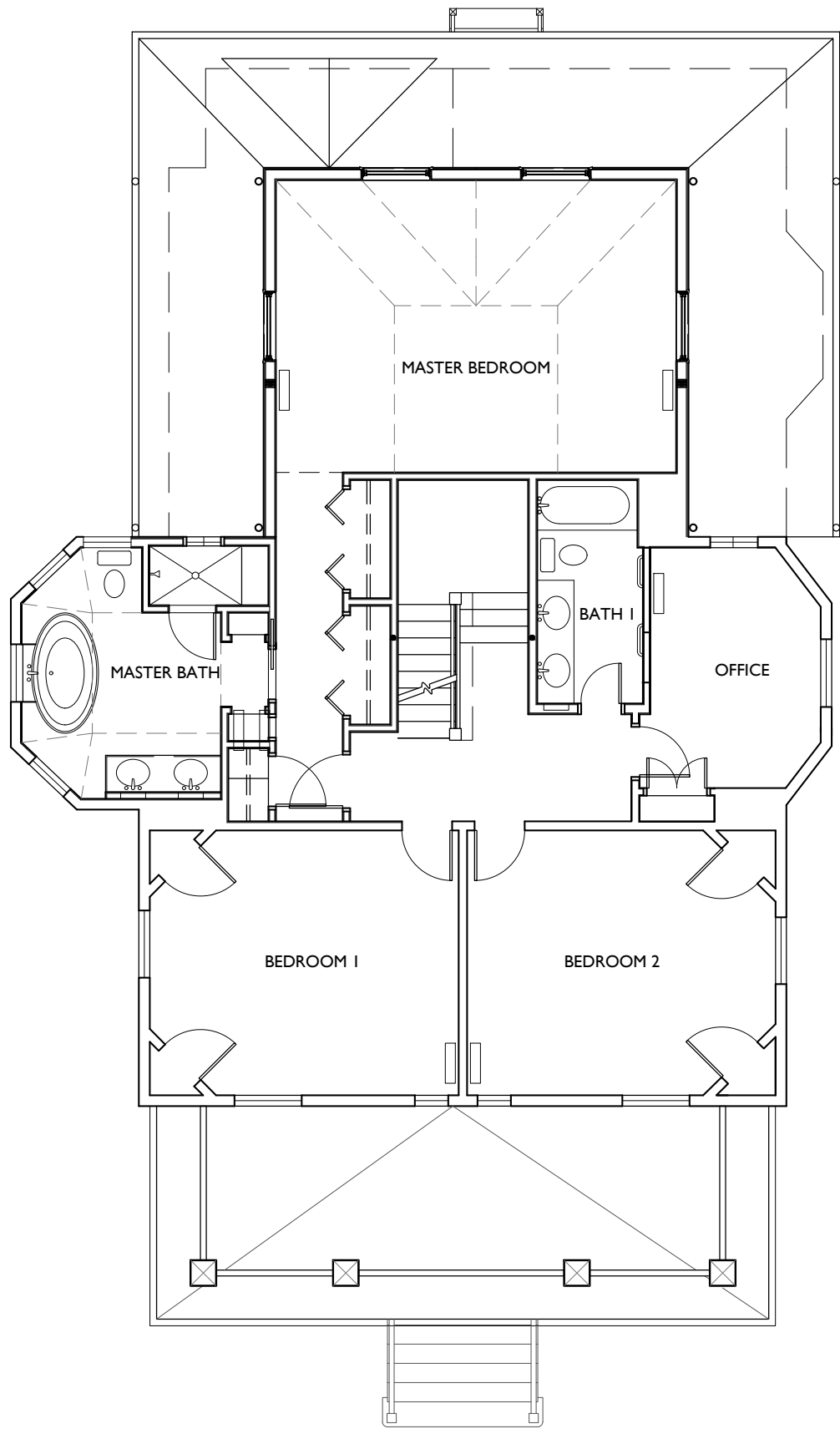




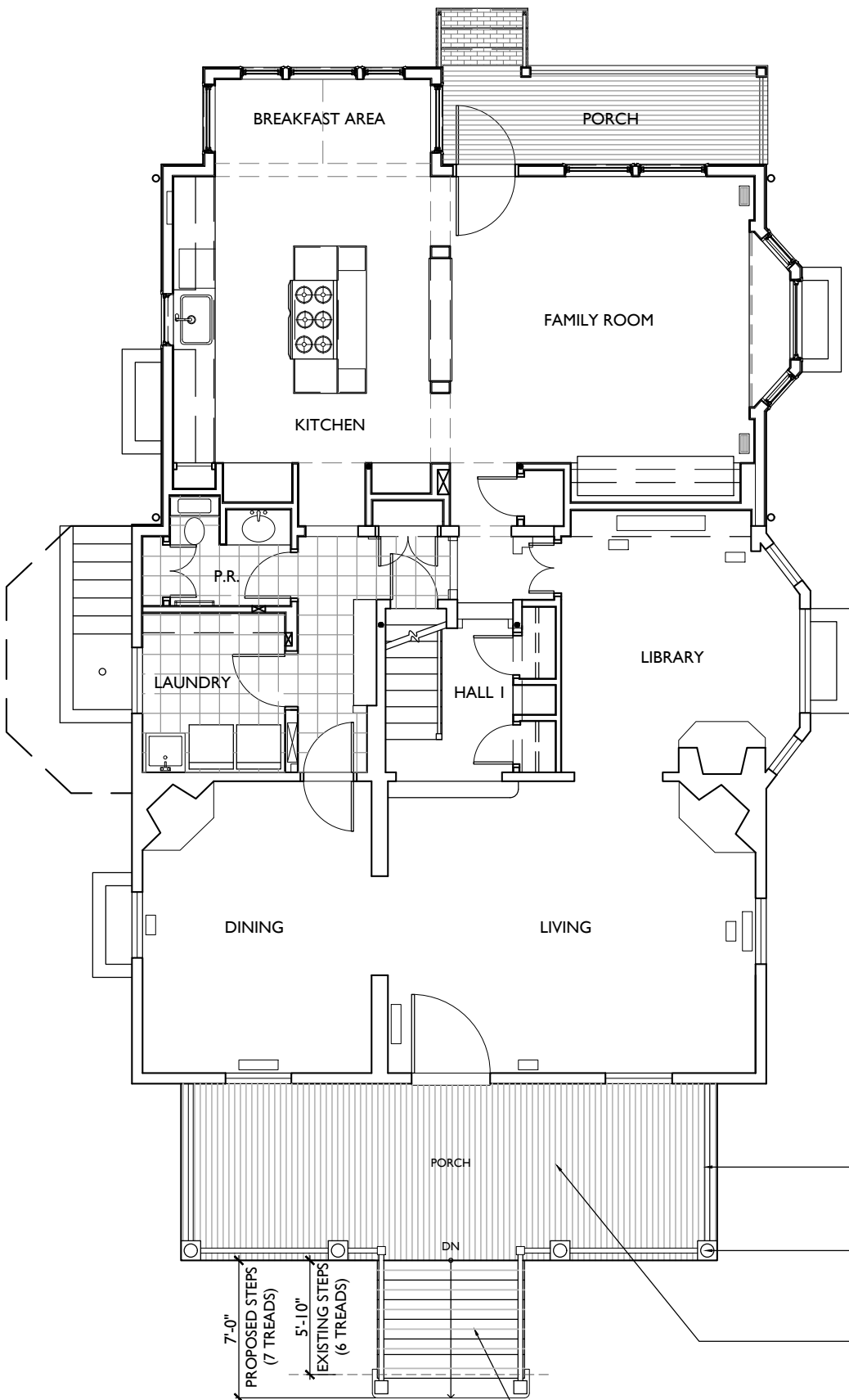
Project Location: Bausch Residence 12 East Lenox Street, Chevy Chase, MD 20815	Drawing Title: Existing and Proposed Site Plans		Drawing No: 1	
	Scale: 1/16" = 1'-0"		Date: 10-23-19	

Van Dusen
Architects

1711 Connecticut Ave. NW
Washington, DC 20009
TEL: (202) 332-3890
EMAIL: bery@vandusenarchitects.com



Proposed Porch Roof w/ Balustrade
Scale: 1/8" = 1'-0"



Proposed Porch Plan
Scale: 1/8" = 1'-0"

FRONT PORCH RENOVATION:

1. 9" ROUND PAINTED WOOD IONIC STYLE COLUMNS TO REPLACE EXISTING 6" ROUND COLUMNS ON PEDESTALS
 2. NEW PORCH PLANKS, 1 x 4 T&G COMPOSITE PLANKS (TIMBERTECH 'AZEK' PORCH COLLECTION; COLOR: COASTLINE (MED. GRAY))
 3. NEW CODE-COMPLIANT (RISE/RUN) STEPS w/ COMPOSITE TREADS & PAINTED RISERS:
(7) TREADS @ 11.5" (8) RISERS @ 6.75";
 4. NEW WOOD RAILINGS, AND LATTICE PANELS BELOW STRINGERS TO REPLACE EXISTING
 5. NEW PAINTED WOOD PORCH RAILINGS @ 36" A.F.F. TO REPLACE EXISTING 24" RAILINGS
 6. INSTALL NEW WOOD BALUSTRADE AND NEW METAL ROOFING
- INSTALL NEW LATTICE PANELS BETWEEN EXISTING BRICK PIERS

NEW WOOD PORCH RAILING @ 36" A.F.F. TO REPLACE EXISTING 24" HT. RAILINGS, TYP.

NEW 9" ROUND IONIC STYLE WOOD COLUMNS TO REPLACE EXISTING 6" ROUND COLUMNS ON PEDESTALS (TYP. OF 4)

REPLACE DAMAGED PORCH PLANKS w/ 1x4 T&G COMPOSITE PLANKS

NEW CODE-COMPLIANT (RISE/RUN) STEPS w/ COMPOSITE TREADS & PTD RISERS:
(7) TREADS @ 11.5", (8) RISERS @ 6.75";
NEW WOOD RAILINGS, AND LATTICE PANELS BELOW STRINGERS TO REPLACE EXISTING

Project Location:	Drawing No:	
	Scale:	Drawing No:
Bausch Residence 12 East Lenox Street, Chevy Chase, MD 20815	1/8" = 1'-0"	2
	Date:	10-23-19
Drawing Title: Front Porch Plans (Proposed)		
Van Dusen Architects 1711 Connecticut Ave. NW Washington, DC 20009 TEL: (202) 332-3890 EMAIL: bery@vandusenarchitects.com		



○ Proposed East (Side) Elevation
Scale: 1/8" = 1'-0"



○ Proposed North (Front) Elevation
Scale: 1/8" = 1'-0"



○ Proposed West (Side) Elevation
Scale: 1/8" = 1'-0"

FRONT PORCH RENOVATION:

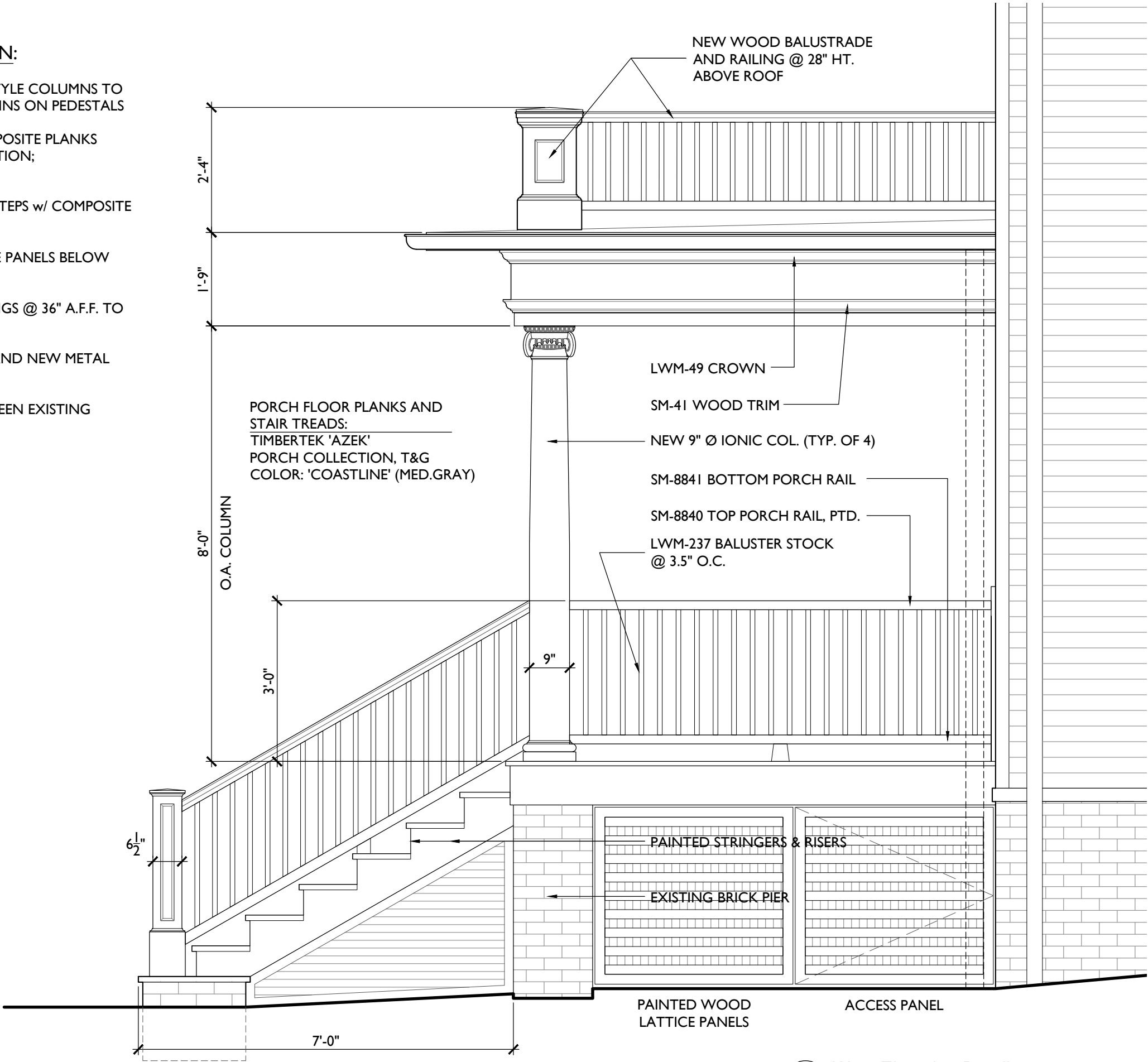
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 5. NEW PAINTED WOOD PORCH RAILINGS @ 36" A.F.F. TO REPLACE EXISTING 24" RAILINGS
 6. INSTALL NEW WOOD BALUSTRADE AND NEW METAL ROOFING
- INSTALL NEW LATTICE PANELS BETWEEN EXISTING BRICK PIERS

Project Location: Bausch Residence 12 East Lenox Street, Chevy Chase, MD 20815	Drawing Title: Front Porch Elevations (Proposed)		Scale: 1/8" = 1'-0"	Drawing No: 3
	Van Dusen Architects <small>1711 Connecticut Ave. NW Washington, DC 20009 TEL: (202) 332-3890 EMAIL: benv@vandusenarchitects.com</small>		Date: 10-23-19	

FRONT PORCH RENOVATION:

- 1. 9" ROUND PAINTED WOOD IONIC STYLE COLUMNS TO REPLACE EXISTING 6" ROUND COLUMNS ON PEDESTALS
- 2. NEW PORCH PLANKS, 1 x 4 T&G COMPOSITE PLANKS (TIMBERTECH 'AZEK' PORCH COLLECTION; COLOR: COASTLINE (MED. GRAY)
- 3. NEW CODE-COMPLIANT (RISE/RUN) STEPS w/ COMPOSITE TREADS & PAINTED RISERS: (7) TREADS @ 11.5" (8) RISERS @ 6.75";
- 4. NEW WOOD RAILINGS, AND LATTICE PANELS BELOW STRINGERS TO REPLACE EXISTING
- 5. NEW PAINTED WOOD PORCH RAILINGS @ 36" A.F.F. TO REPLACE EXISTING 24" RAILINGS
- 6. INSTALL NEW WOOD BALUSTRADE AND NEW METAL ROOFING

INSTALL NEW LATTICE PANELS BETWEEN EXISTING BRICK PIERS



West Elevation Detail

Scale: 1/2" = 1'-0"

Project Location: Bausch Residence 12 East Lenox Street, Chevy Chase, MD 20815	Drawing Title:	Scale: 1/2" = 1'-0"	Drawing No: 4
	Van Dusen Architects 1711 Connecticut Ave. NW Washington, DC 20009 TEL: (202) 332-3890 EMAIL: bery@vandusenarchitects.com	Date: 10-23-19	



Existing North (Front) Elevation



Scheme 'A'
(Existing Columns and Pedestals W/ 36" ht. Rail)



Scheme 'B'
(New Columns and 36" ht. Pedestals & Rail)



Scheme 'C'
(New Full Height Columns w/ 36" ht. Rail)