MONTGOMERY COUNTY HISTORIC PRESERVATION COMMISSION STAFF REPORT

Address: 3930 Washington Street, Kensington Meeting Date: 8/16/2023

Resource: Primary Resource **Report Date:** 8/9/2023

Kensington Historic District

Public Notice: 8/2/2023

Applicant: John and Iris Schwabe (Jodi Longo, Architect)

Tax Credit: N/A

Review: HAWP

Staff: John Liebertz

Permit Number: 1030006

PROPOSAL: Demolition of accessory structure and construction of a one-story addition,

construction of new shed, other alterations.

STAFF RECOMMENDATION

Staff recommends that the Historic Preservation Commission (HPC) <u>approve with two (2) condition</u> the HAWP application with final review and approval delegated to staff:

- 1. The applicant shall submit the following information for the proposed addition:
 - a. window and door schedule (with applicable specification sheets);
 - b. specification sheets for the polyvinyl chloride railing and cementitious fiberboard siding (which notes the reveal); and
 - c. include a note that all polyvinyl chloride trim (including the column and pier wrappings) will be painted. Painting of the polyvinyl chloride railing system is not required.
- 2. The applicant shall submit the following information for the proposed shed:
 - a. window and door schedule (with applicable specification sheets);
 - b. specification sheets for the cementitious fiberboard siding (which notes the reveal); and
 - c. include a note that all polyvinyl chloride trim will be painted.

ARCHITECTURAL DESCRIPTION

SIGNIFICANCE: Primary Resource within the Kensington Historic District

STYLE: Shingle DATE: Ca. 1898



Figure 1: The subject property at 3930 Washington Street is located on the south side of the street. The red line is the boundary of the Master Plan Historic District and the yellow star is the location of the subject dwelling.

PROPOSAL

The applicant proposes to: 1) demolish an existing deck and cellar access on the rear elevation of the house; 2) construct a one-story rear addition with a rear porch; 3) demolish the detached garage; and 4) install a shed (10' x 10) in the rear yard.

APPLICABLE GUIDELINES

The Historic Preservation Office and Historic Preservation Commission (HPC) consult several documents when reviewing alterations and new construction within the Kensington Master Plan Historic District. These documents include the approved and adopted Kensington Master Plan Historic District Amendment (Amendment), Vision of Kensington, (Vision), Montgomery County Code Chapter 24A (Chapter 24A), and the Secretary of the Interior's Standards for Rehabilitation (Standards). The pertinent information in these documents is outlined below.

Master Plan Amendment

The Amendment notes that:

The district is architecturally significant as a collection of late 19th and early 20th century houses that exhibit a variety of architectural styles popular during the Victorian period including Queen Anne, Shingle, Eastlake, and Colonial Revival. The houses share a uniformity of scale, setbacks, and construction materials that contribute to the cohesiveness of the district's streetscapes. This uniformity, coupled with the dominant design inherent in Warner's original plan of subdivision, conveys a strong sense of both time and place, that of a Victorian garden suburb.

Vision of Kensington

In accordance with Section 1.5 of the Historic Preservation Rules, Guidelines, and Procedures (Regulation No. 27-97), the Commission in developing its decision when reviewing a Historic Area Work Permit application for an undertaking involving a resource within the Kensington Historic District may use the Vision to determine the appropriateness of a proposal. The goal of the Vision "was to establish a sound database of information from which to produce a document that would serve the HPC, M-NCPPC, their staff, and the community in wrestling with the protection of historic districts amidst the pressures of life in the 21st century."

In addition, the Vision provides a specific physical description of the district as it was at the time of the study (August, 1992), an analysis of character-defining features of the district, a discussion of the challenges facing the district, and a discussion of proposed strategies for maintaining the character of the district, while allowing for appropriate growth and change.

The Vision identifies the following, as those features that help define the character of Kensington's built environment:

- Building Setbacks: Residential and Commercial Patterns
- Rhythm and Spacing between Buildings
- Geographic and Landscape Features
- Scale and Building Height
- Directional Expression of Buildings
- Roof Forms and Materials
- Porches

- Dominant Building Material
- Outbuildings
- Integrity of Form, Building Condition, and Threats
- Architectural Style

Montgomery County Code, Chapter 24A-8

The following guidance which pertains to this project are as follows:

- (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 ensure 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
- (c) It is not the intent of this chapter to limit new construction, alteration or repairs to any 1 period or architectural style.
- (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. (Ord. No. 9-4, § 1; Ord. No. 11-59.)

Secretary of the Interior's Standards for Rehabilitation

The Secretary of the Interior defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features, which convey its historical, cultural, or architectural values." The applicable *Standards* are as follows:

- 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 subject property is a Primary Resource to the Kensington Historic District. The property features a distinctive two-story, Shingle Styled house with a cross Dutch gambrel roof. The wood-frame building rests on a stone foundation. The walls are clad with wood lap siding on the first story and wood shingles in the upper gambrel ends. The asphalt shingle-clad roof is pierced by an internal brick chimney at the intersection of the gambrel roofs. The façade (north elevation) features a character defining full width, recessed front porch supported by wood posts. Fenestration primarily consists of three-over-one, double-hung, wood-sash windows. Other significant architectural features are the oriel window on the west elevation and a bay window on the east elevation. These irregular projections provide a sense of visual interest typical of the style. The dwelling retains a high degree of integrity and there are no relevant Historic Area Work Permits (HAWP) recorded for the resource.



Figure 2: View of the façade (north) and east elevation of the subject house (left) and the 1950-1963 Sanborn Fire Insurance Map (property outlined in red).

Source: Montgomery Planning and Sanborn Fire Insurance Company.

A small detached, one-story, one-car garage (*Figure 3*) is located to the southwest of the dwelling and accessed by a brick paver driveway. The non-historic, front-gable, wood-frame building rests on a concrete pad. The walls are clad with vertical wood siding on the south and north elevations and drop wood siding on the west and east elevations. The roof is clad in asphalt shingles.



Figure 3: Aerial view from the west of property (left) and view of the north and east elevation of the detached garage (right).

Source: ConnectExplorer and Montgomery Planning.

Preliminary Hearing #1 — Historic Preservation Commission, May 24, 2023

At the first meeting, the applicant proposed to construct a one-story with basement, wood-frame, rear addition. The addition consisted of a single-story, gable-roof hyphen that connected to the taller single-story, gable-roof section with a shed-roof rear porch (*Figure 5*). Historic Preservation Staff found that the proposal complied with the applicable guidelines and recommended approval. The commission supported the demolition of a shed and construction of a rear addition, but found the proposed roof form of the addition to be incompatible with the historic house. Items recommended for further study included altering the addition's massing and form, offsetting the addition and turning it perpendicular to the house, increasing the length of the hyphen, and introduction of trim elements to separate the new construction from the historic house.

Members of the Kensington Local Advisory Panel (LAP) found that the proposal met regulatory compliance, but shared concerns about the lack of distinction between the new construction and historic house, width and depth of the hyphen, and the effect of a theoretical second story to the proposed one-story addition.

Preliminary Hearing #2 — Historic Preservation Commission, July 12, 2023

At the second meeting, the applicant returned to the HPC with amended drawings that responded to the commission's comments. Historic Preservation Staff found that the proposal failed to comply with the applicable guidelines. Specifically, the depth of the hyphen was insufficient. The proximity of a side-gambrel addition of this scale to the historic front-gambrel house adversely effected the design of the resource and was incompatible with the character of the streetscape. Staff recommended increasing the length of the hyphen to provide greater relief from the rear elevation and separate the two overhanging roofs. The HPC agreed that the depth of the hyphen needed to be increased and recommended at least 9' between the historic house and new addition. The commission found the width of the hyphen to be appropriate to the massing of the historic resource.

Description of Proposed Rear Addition

The applicant revised their application in response to the HPC's comments. The proposed addition remains a single-story with a basement, wood-frame, rear addition. The most significant change is to the hyphen. The addition now consists of a 12'-deep, gable-roof hyphen that connects to a one-story, gambrel roof addition (28' x 27'4") with a full width, hipped-roof, rear porch (9' x 27'4"). On the side elevations, the gable-roof hyphen is recessed approximately 2'6" from the original house and gambrel addition (*Figure 4*).



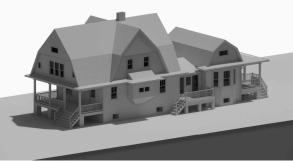


Figure 4: Model of proposed addition.

Source: Applicant.

The materials remain consistent from the last application. This includes the cementitious fiberboard siding, polyvinyl chloride trim, aluminum-clad wood windows and doors, solid extruded polyvinyl

chloride decking, polyvinyl chloride railings, architectural asphalt shingles, and half-round copper gutters and downspouts.

Description of Proposed Rear Shed

The applicant proposes to build a 10' x' 10 shed in the rear of the property. The one-story, front-gable, wood-frame shed would be placed on a concrete pad. Materials consist of cementitious fiberboard lap siding, polyvinyl chloride trim, and architectural asphalt shingles. Fenestration consists of a single-leaf, two-panel, one-light, single-leaf door, and a one-over-one, double-hung, aluminum-clad, wood window.

Proposed Demolition of Rear Porch and Cellar Access

Staff finds the demolition of the first story including the small, non-historic, shed-roof porch and a cellar accessed via a corrugated metal hatch to be consistent with the applicable guidelines and recommends approval (*Figure 4*). The porch is a non-historic addition and neither element is a character defining feature of the dwelling or district.

Proposed Rear Addition – Concept, Scale, and Massing, and Design

Staff finds that the applicant responded to the HPC recommendations from the preliminary hearings and the proposal to be consistent with the applicable guidelines and recommend approval. The applicant extended the depth of the hyphen from 6' to 12', thereby providing greater relief between the front-gambrel historic house and side-gambrel addition. The proposal is compatible with the historic resource and the character of the historic district.

Proposed Rear Addition – Materials

Staff finds that the proposed materials to be consistent with the applicable guidelines and recommends approval with conditions. The HPC regularly approves the use of aluminum-clad wood windows and doors, architectural asphalt shingle roofs, cementitious fiberboard siding, and polyvinyl chloride trim on additions to Primary Resources in the Kensington Historic District. Staff finds that cementitious fiberboard siding with a reveal that matches the historic house to be appropriate in this case. While the HPC often requests distinction between historic and non-historic materials, there are too many textures on the historic house to introduce another design element. Furthermore, the setback and form of the addition clearly identifies the hyphen and side-gambrel addition as new construction. Staff requests the applicant submits 1) a window and door schedule (with applicable specification sheets); 2) specification sheets for the polyvinyl chloride railing and cementitious fiberboard siding (which notes the reveal); 3) include a note that all polyvinyl chloride trim (including the column and pier wrappings) will be painted. Painting of the polyvinyl chloride railing system is not required.

Proposed Shed

Staff finds that the proposed shed to be consistent with the applicable guidelines and recommends approval with conditions. The scale, design, form, and materials are compatible with the historic resource and surrounding streetscape, but there are several materials specifications absent. Staff requests that the applicant submit: 1) a window and door schedule (with applicable specification sheets); 2) specification sheets for the cementitious fiberboard siding (which notes the reveal); and 3) include a note that all polyvinyl chloride trim will be painted.

After full and fair consideration of the applicant's submission, staff finds the proposal, as modified by the condition, consistent with the Criteria for Issuance in Chapter 24A-8(b), (1), (2), and (d), having found the proposal is consistent with the Secretary of the Interior's Standards for Rehabilitation #9 and #10, and Vision of Kensington.

STAFF RECOMMENDATION

Staff recommends that the Commission approve with two (2) conditions the HAWP application:

- 1. The applicant shall submit the following information for the proposed addition:
 - a. window and door schedule (with applicable specification sheets);
 - b. specification sheets for the polyvinyl chloride railing and cementitious fiberboard siding (which notes the reveal); and
 - c. include a note that all polyvinyl chloride trim (including the column and pier wrappings) will be painted. Painting of the polyvinyl chloride railing system is not required.
- 2. The applicant shall submit the following information for the proposed shed:
 - a. window and door schedule (with applicable specification sheets);
 - b. specification sheets for the cementitious fiberboard siding (which notes the reveal); and
 - c. include a note that all polyvinyl chloride trim will be painted.

under the Criteria for Issuance in Chapter 24A-8(b), (1), (2), and (d), having found that the proposal, as modified by the condition, is consistent with the *Vision of Kensington*, and therefore 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;

and with the Secretary of the Interior's Standards for Rehabilitation #9 and #10.

and with the general condition that the applicant shall present an electronic set 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 john.liebertz@montgomeryplanning.org to schedule a follow-up site visit.



APPLICATION FOR HISTORIC AREA WORK PERMIT HISTORIC PRESERVATION COMMISSION 301.563.3400

DATE ASSIGNED____

Date

FOR STAFF ONLY:

HAWP#_

APPLICANT:

Name:		E	-mail:	
Address:			City:	Zip:
Daytime Phone: _		1	ax Account No.:	
AGENT/CONTACT	Γ (if applicable	e):		
Name:		E	-mail:	
Address:			City:	Zip:
Daytime Phone: _			Contractor Registra	tion No.:
LOCATION OF BU	IILDING/PREM	IISE: MIHP # of Historic	Property	
map of the easen Are other Plannin	nent, and docuing and/or Heariin Variance, Recontermation.	mentation from the Easeing Examiner Approvals /rd Plat, etc.?) If YES, incl	ment Holder suppo Reviews Required a ude information on	as part of this Application?
Town/City:		Nearest Cross	Street:	
Lot:	_ Block:	Subdivision:	Parcel:	_
for proposed we be accepted for New Const Addition Demolition Grading/Ex I hereby certify the	review. Check ruction kcavation hat I have the a	Deck/Porch Fence Hardscape/Landsca Roof uthority to make the fore	on. Incomplete Ap Shed/ Solar Tree r ape Windo Other egoing application, plans reviewed and	

Signature of owner or authorized agent

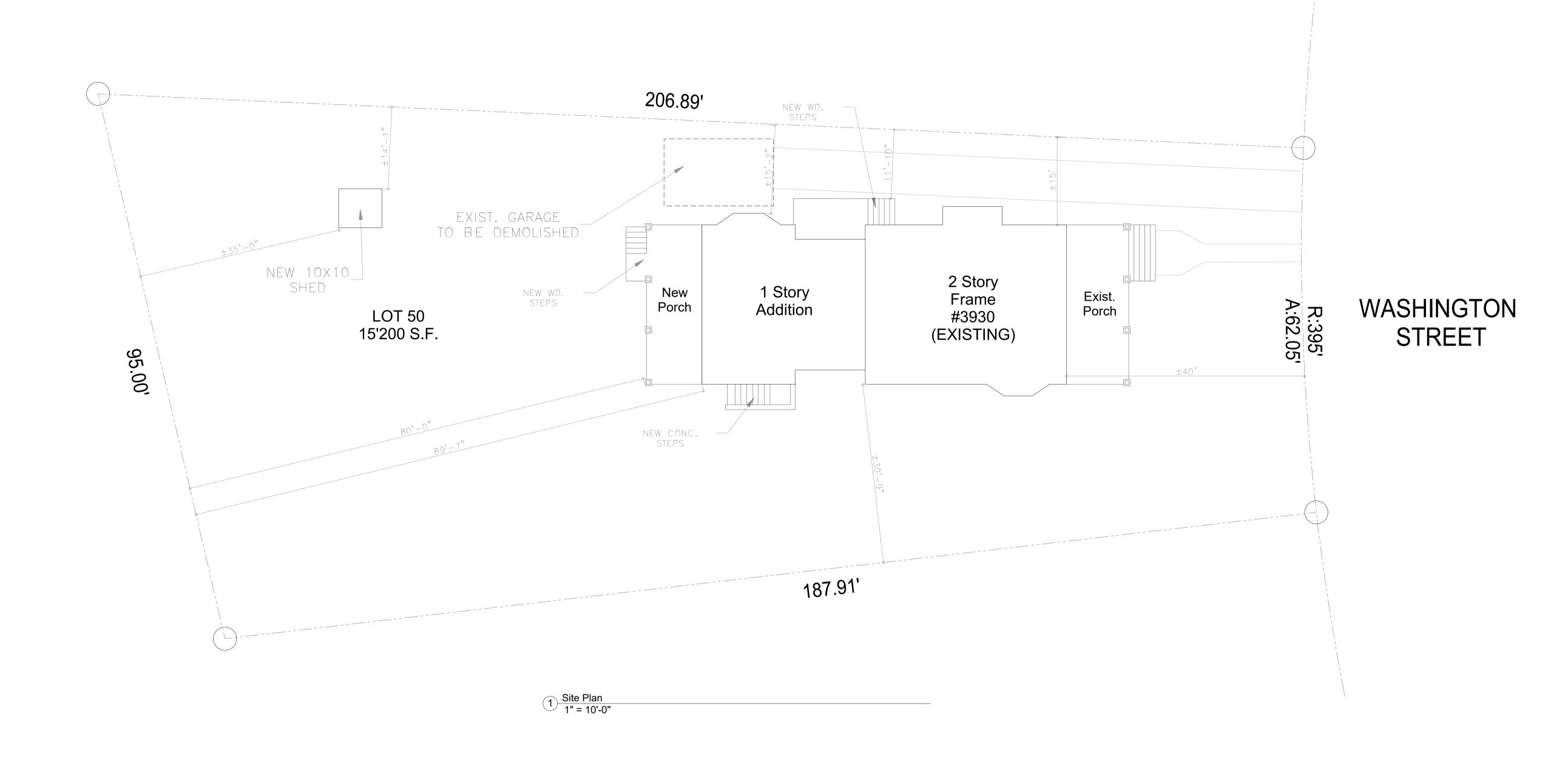
HAWP APPLICATION: MAILING ADDRESSES FOR NOTIFING [Owner, Owner's Agent, Adjacent and Confronting Property Owners] Owner's mailing address Owner's Agent's mailing address Adjacent and confronting Property Owners mailing addresses

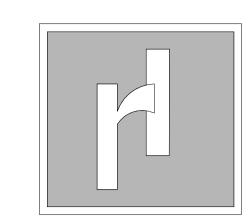
Description of Property: Please describe the building and surrounding environment. Include information on significant structures, landscape features, or other significant features of the property:
Description of Work Proposed: Please give an overview of the work to be undertaken:

Work Item 1:	
Description of Current Condition:	Proposed Work:
Work Item 2:	
Description of Current Condition:	Proposed Work:
Work Item 3:	
Description of Current Condition:	Proposed Work:

HISTORIC AREA WORK PERMIT CHECKLIST OF APPLICATION REQUIREMENTS

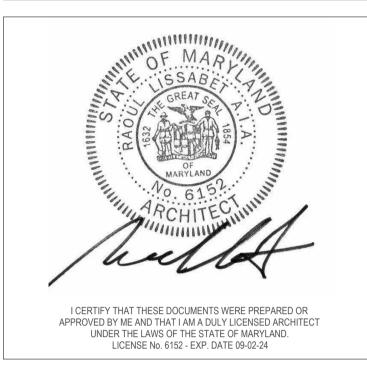
	Required Attachments						
Proposed Work	I. Written Description	2. Site Plan	3. Plans/ Elevations	4. Material Specifications	5. Photographs	6. Tree Survey	7. Property Owner Addresses
New Construction	*	*	*	*	*	*	*
Additions/ Alterations	*	*	*	*	*	*	*
Demolition	*	*	*		*		*
Deck/Porch	*	*	*	*	*	*	*
Fence/Wall	*	*	*	*	*	*	*
Driveway/ Parking Area	*	*		*	*	*	*
Grading/Exc avation/Land scaing	*	*		*	*	*	*
Tree Removal	*	*		*	*	*	*
Siding/ Roof Changes	*	*	*	*	*		*
Window/ Door Changes	*	*	*	*	*		*
Masonry Repair/ Repoint	*	*	*	*	*		*
Signs	*	*	*	*	*		*





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#	Date	

MR. & MRS. SCHWABE

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3930 WASHINGTON ST KENSINGTON, MD 20895

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RESIDENCE ADDITION

Drawing Title:

Site Plan

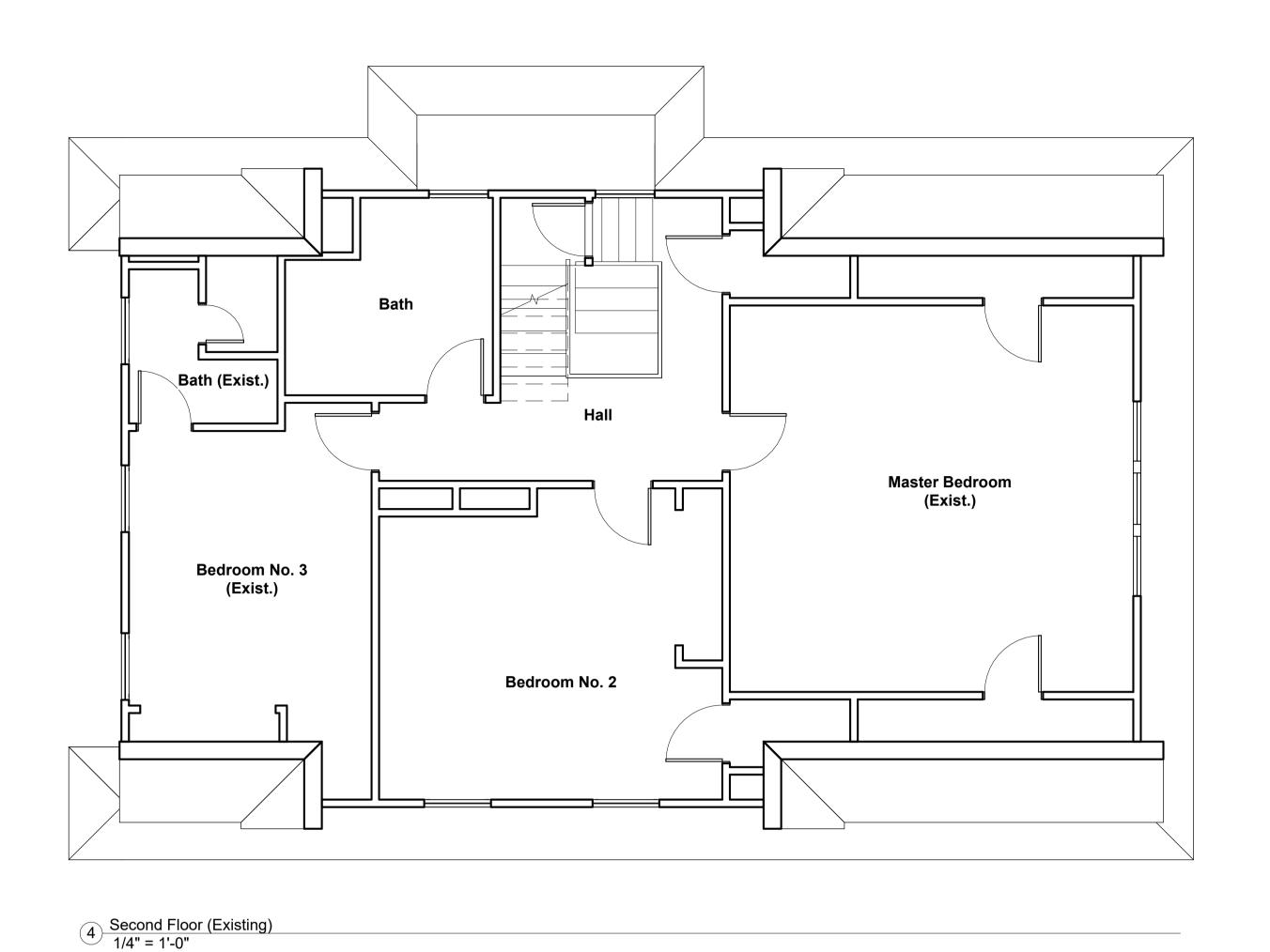
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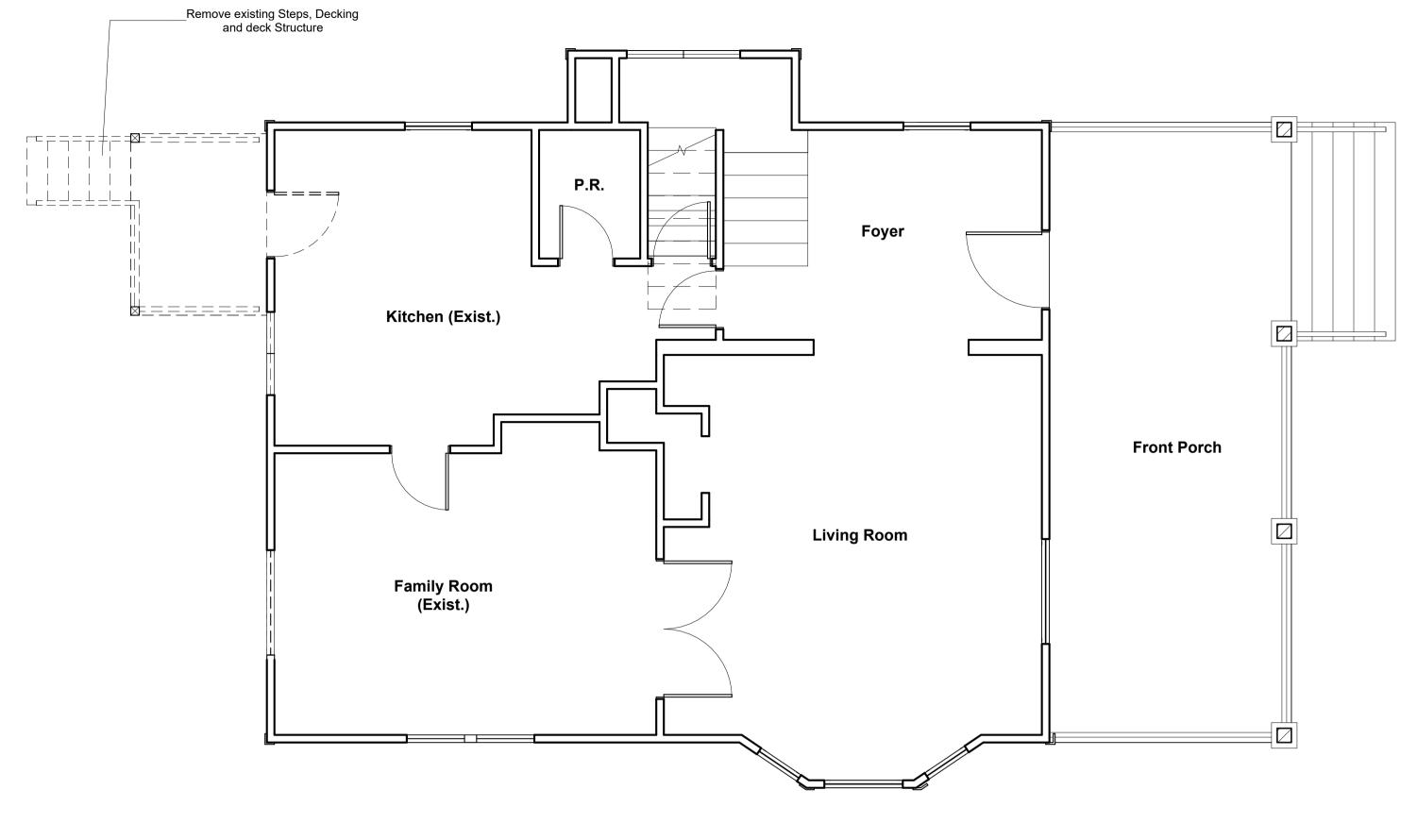
Project No. 110522-E2

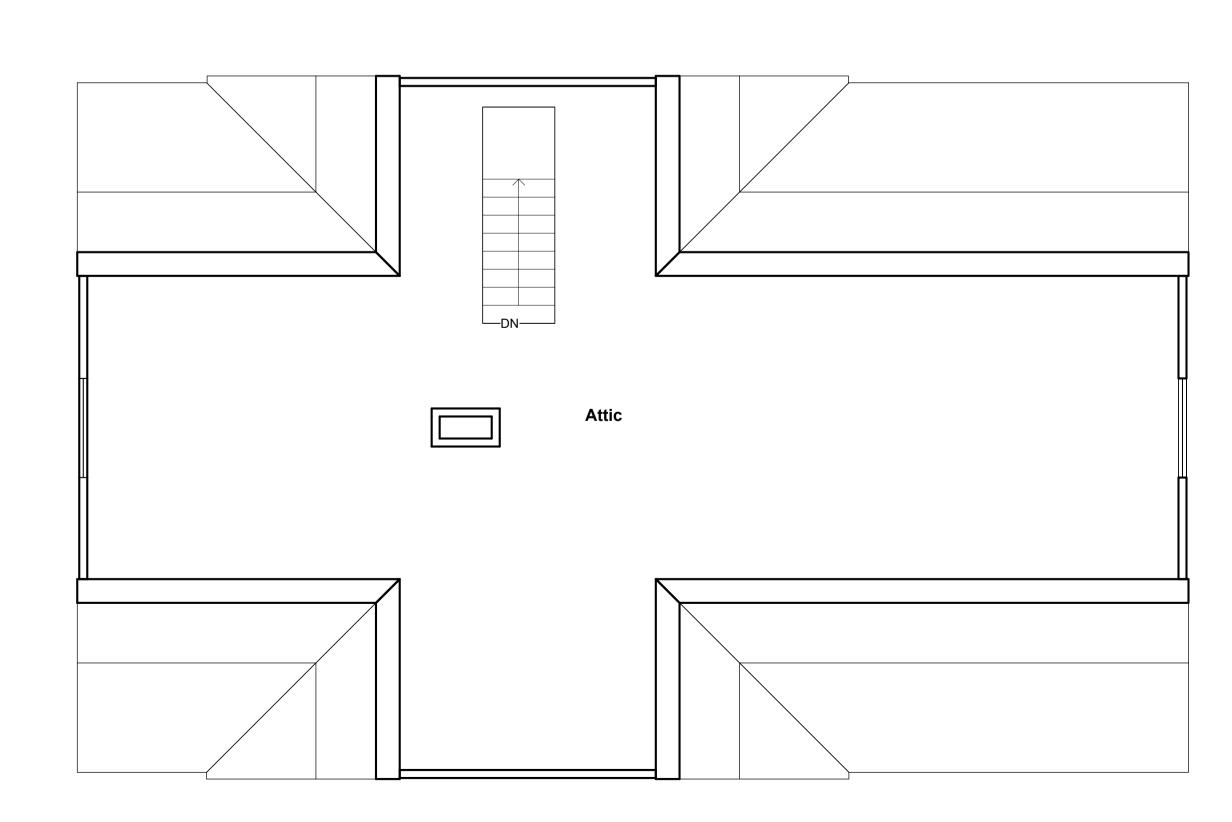
HPC SUBMISISON (07/26/2023)

C.G.

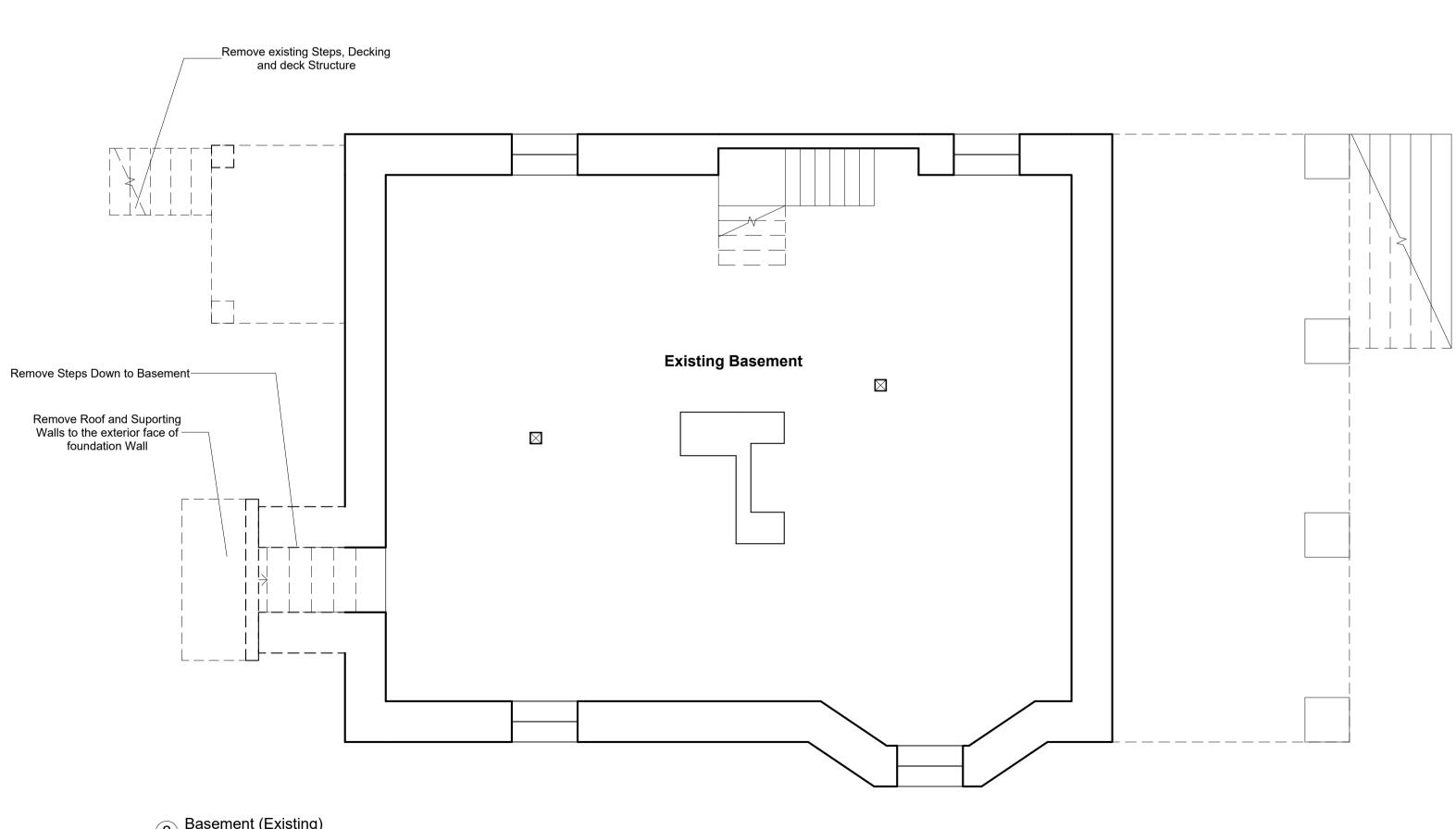
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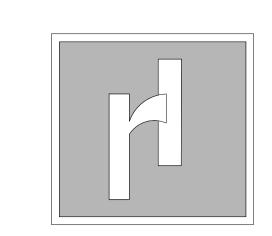


1) Attic Plan (Existing) 1/4" = 1'-0"



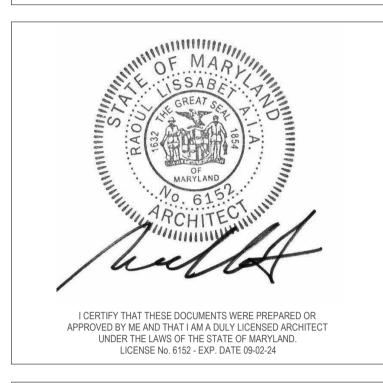
Basement (Existing)
1/4" = 1'-0"

First Floor (Existing)
1/4" = 1'-0"



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#	Date		

MR. & MRS. SCHWABE

3930 WASHINGTON ST KENSINGTON, MD 20895

RESIDENCE ADDITION

Drawing Title:

Floor Plans (Existing & Demo)

C.G.

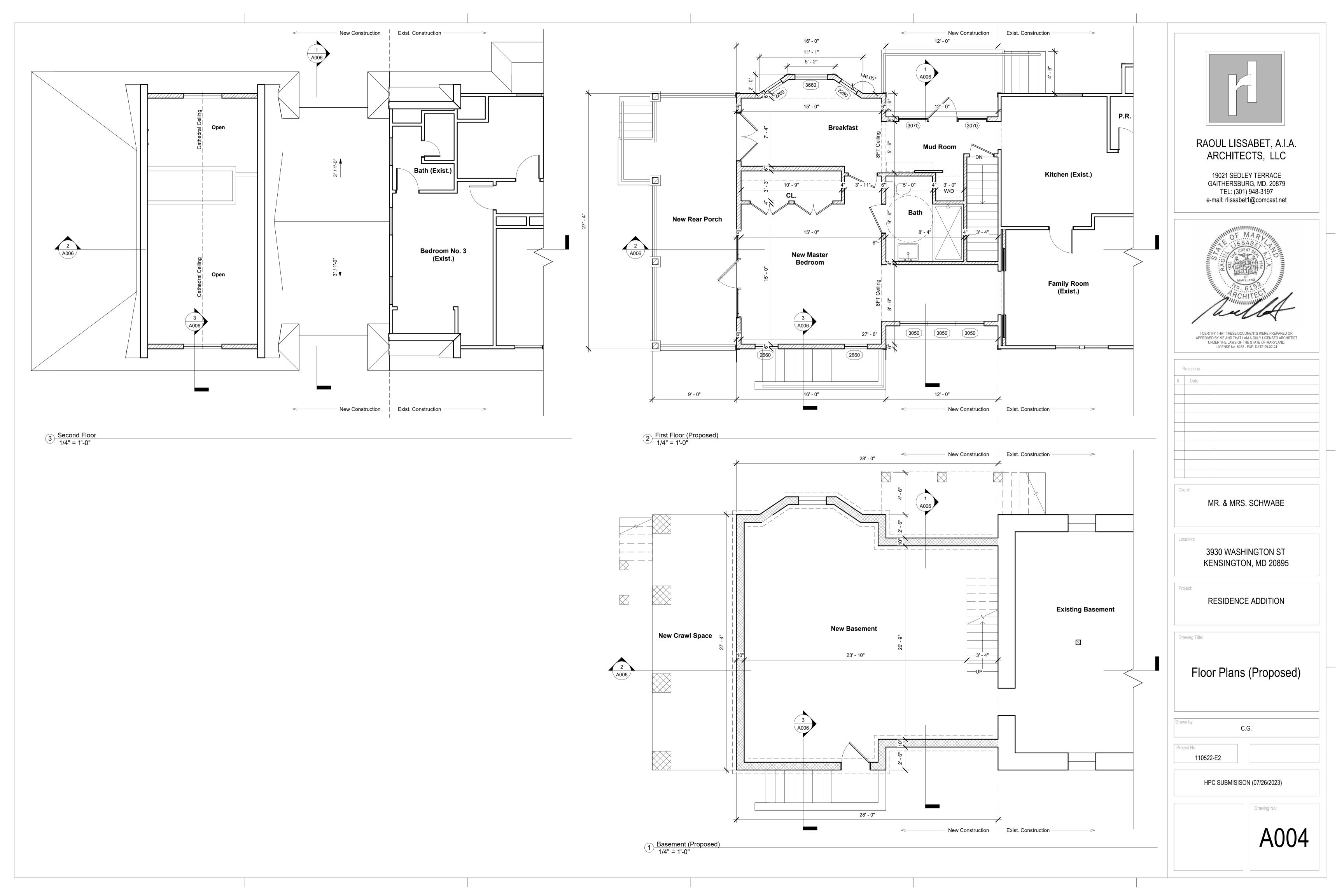
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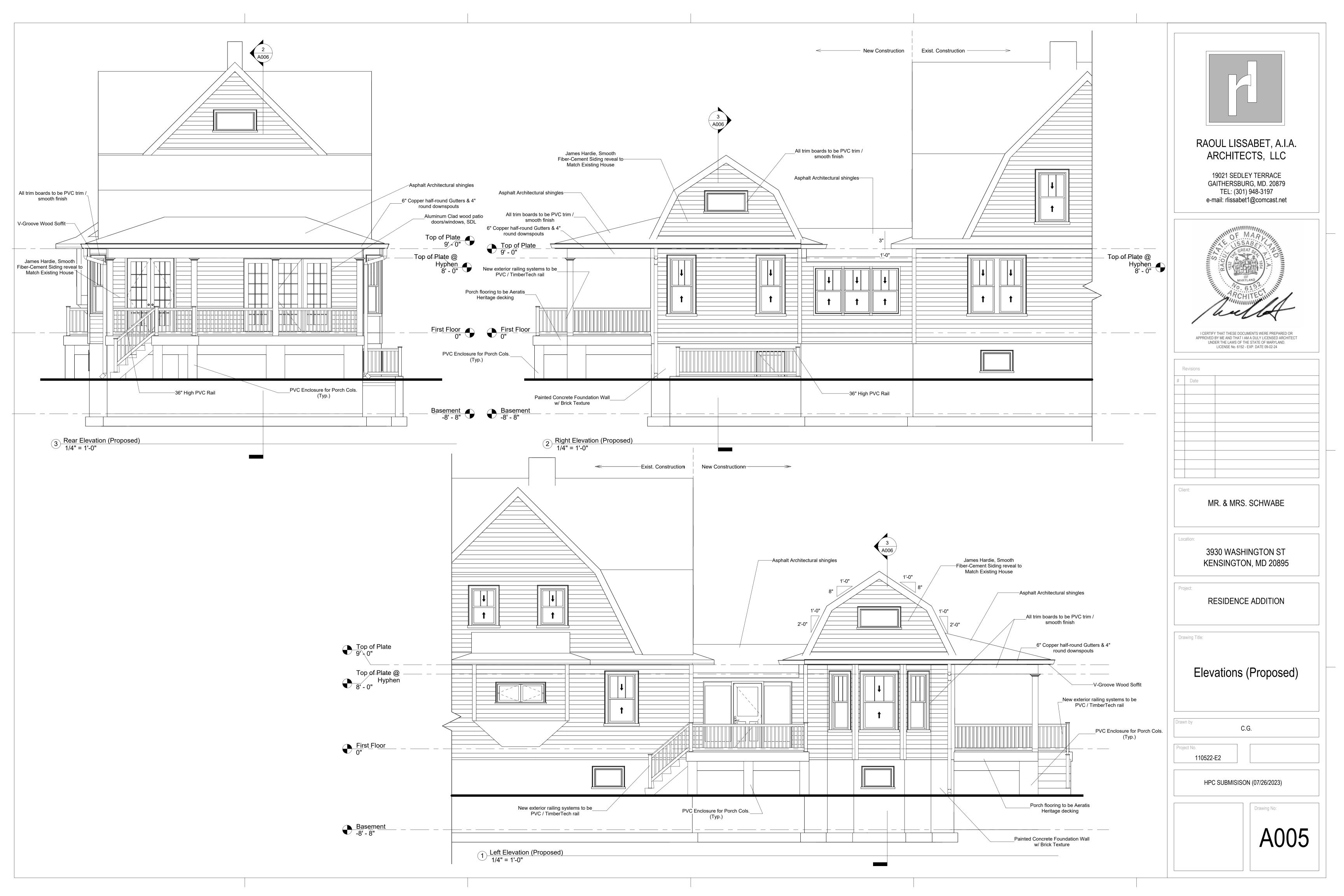
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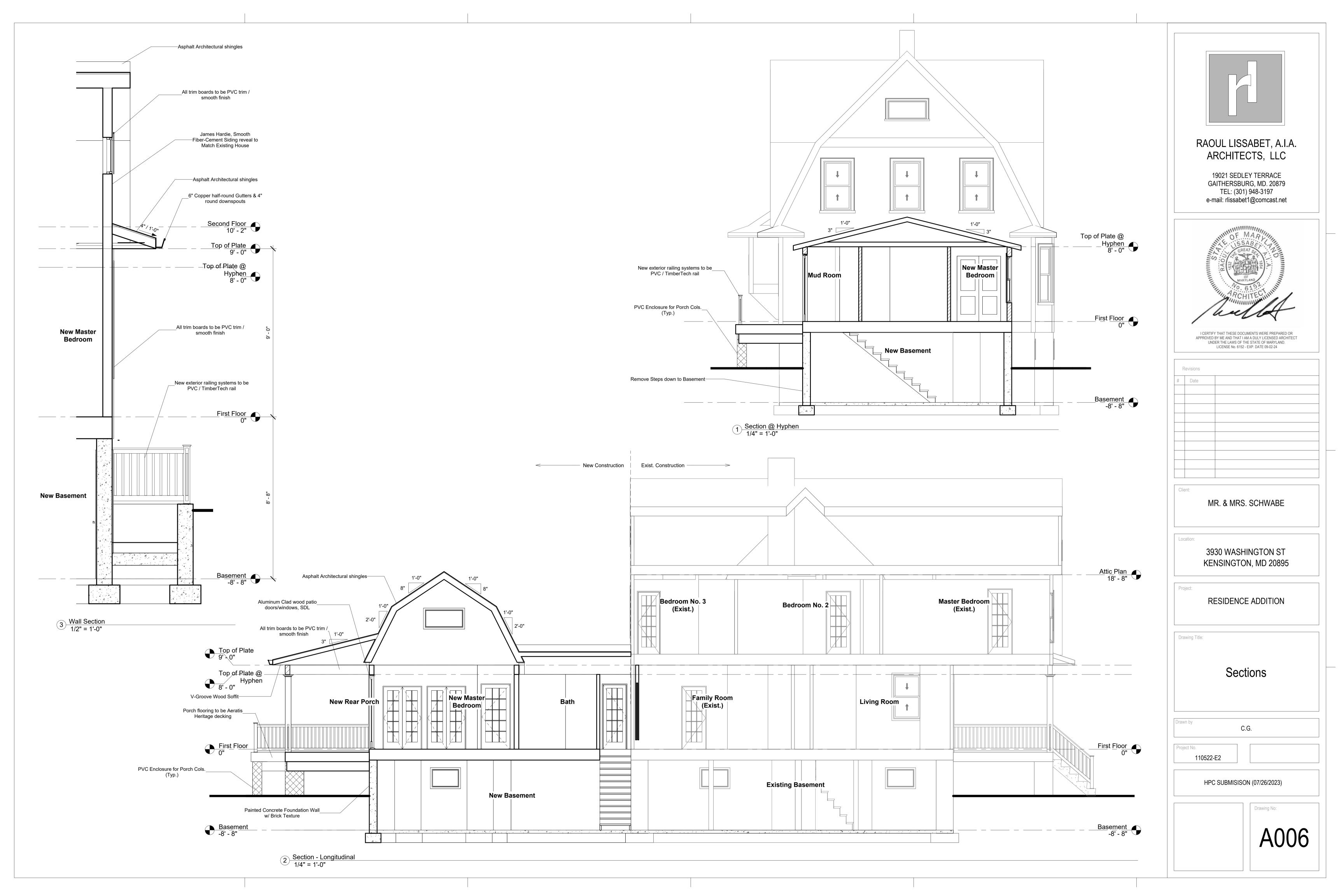
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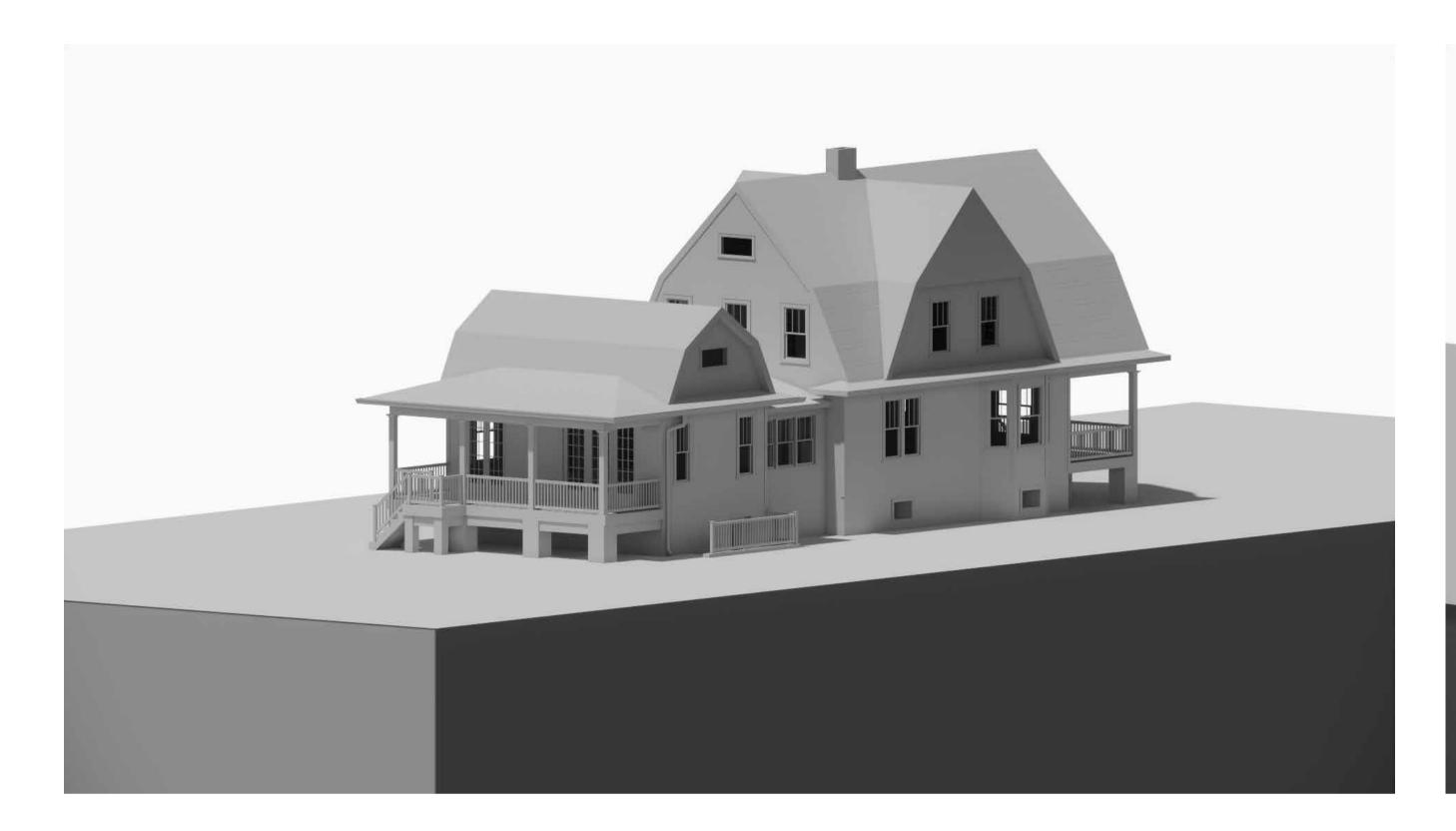
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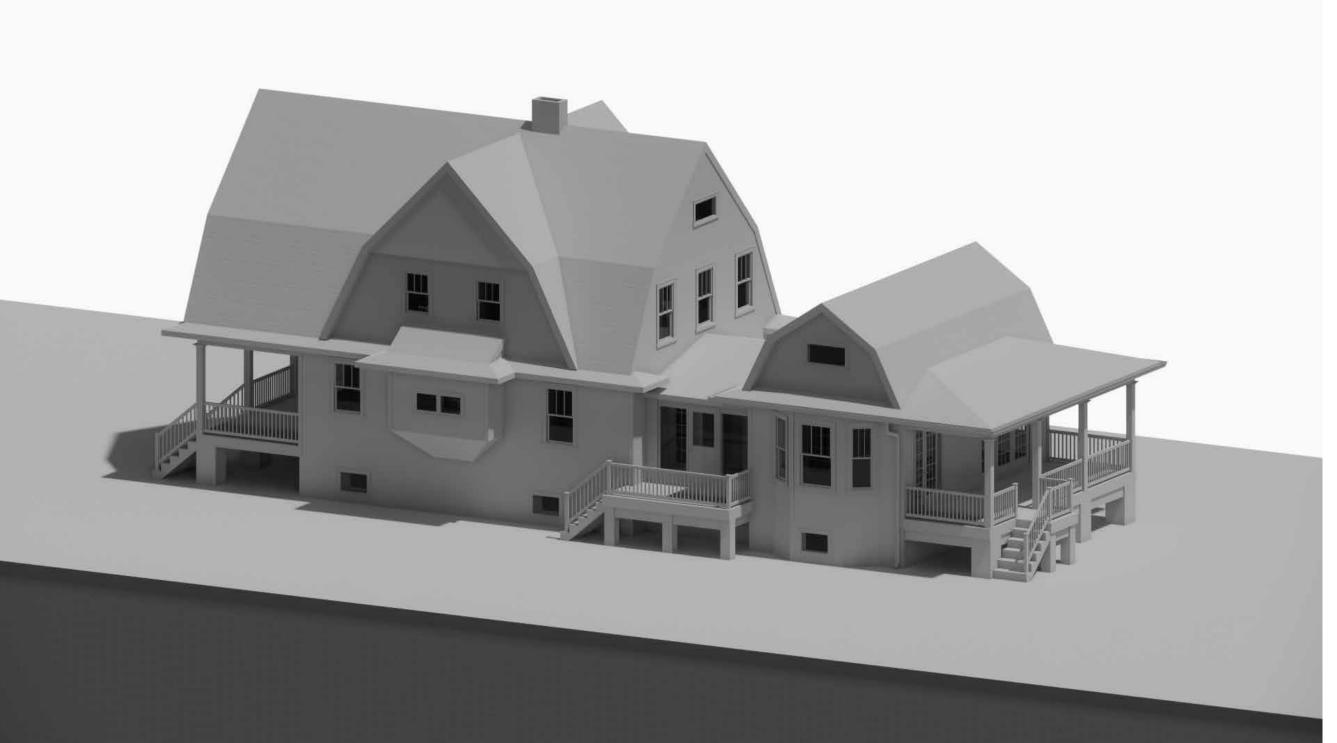


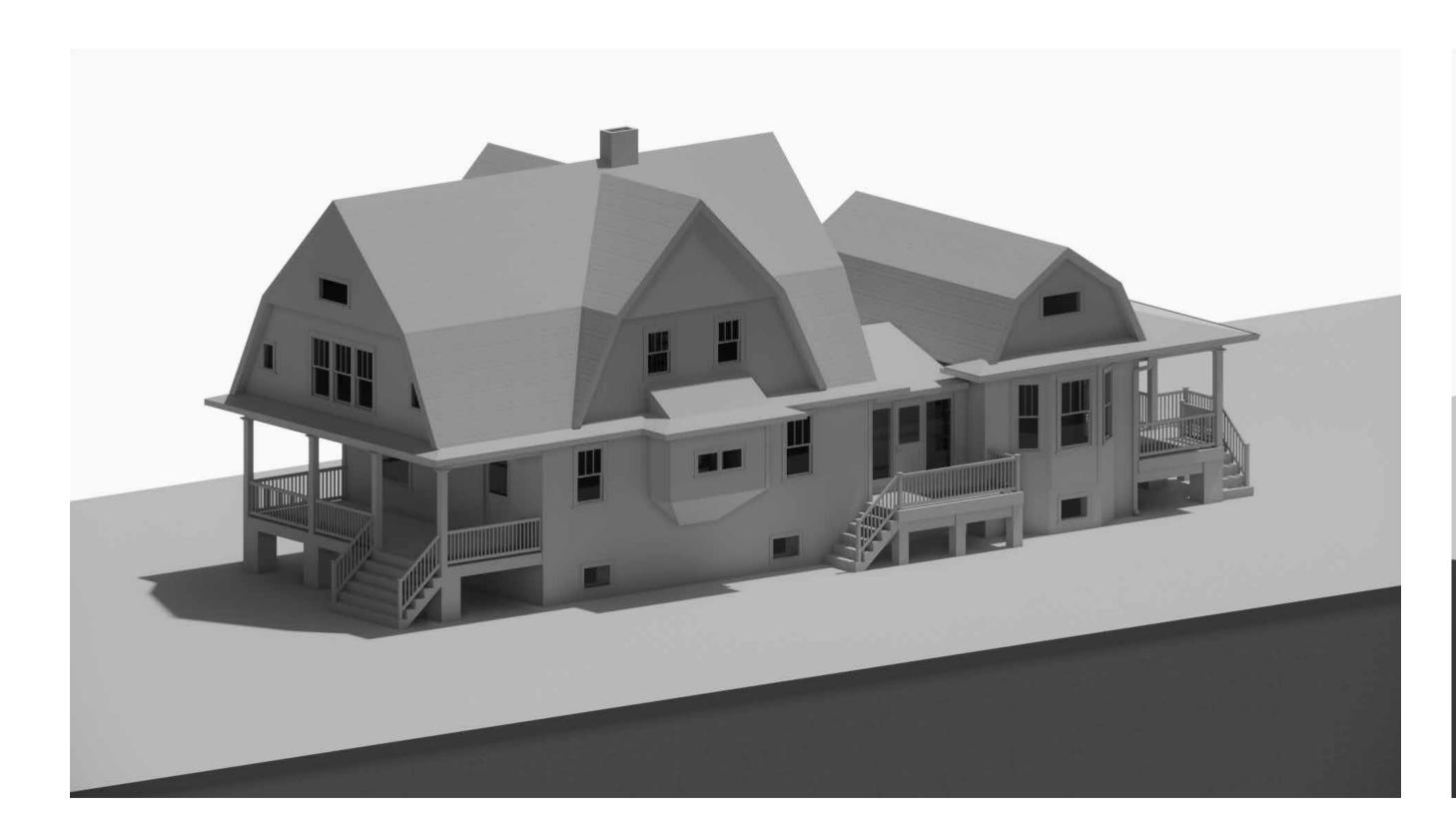




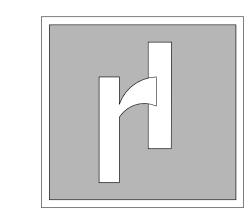






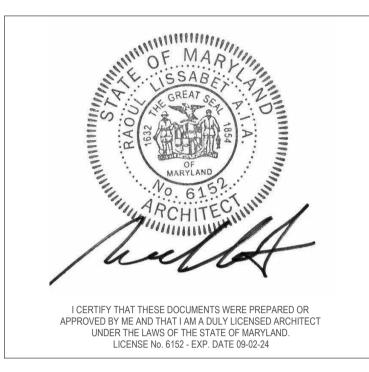






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#	Date		

MR. & MRS. SCHWABE

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3930 WASHINGTON ST KENSINGTON, MD 20895

Project

RESIDENCE ADDITION

Drawing Title:

3D Views

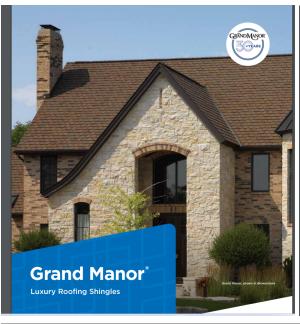
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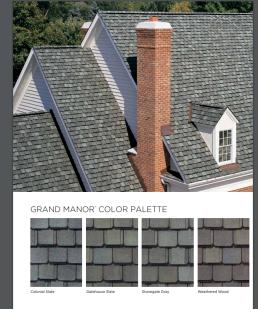
Project No. 110522-E2

C.G.

HPC SUBMISISON (07/26/2023)

A007







The Peak of Perfection

Some roofs say more. About you. About your style. About the home that uniquely showcases your life.

Grand Manor says it all with a style and grace that is exceptional from every angle. The luxurious multi-layered laminated shingle replicates the look of slate with the confidence backed by a lifetime warranty.

Your home becomes your castle with one of the heaviest shingles we've ever made. CertainTeed developed Grand Manor to endure all types of weather and always look its best, even on the steepest slopes.

STRIKING LOOKS

Deep shadows and random tabs are the secrets behind the design genius in Grand Manor. The result is a shingle with the incredibly authentic depth and dimension of slate.

LASTING BEAUTY

Our exclusive Super Shangle' construction design results in a shingle that, once installed, offers virtually five layers of protection. Made of the industry's most durable roofing materials, you'll have a roof with unsurpassed defense against the elements.

StreakFighter* PROTECTION

The ultimate in stain protection. CertainTeed's StreakFighter technology uses the power of science to repel algae before it can take hold and spread. StreakFighter's granular blend includes naturally algae-resistant copper to combat the ugly black streaking caused by algae and help your roof maintain its beauty for years to come.

With Grand Manor on your home, you'll have the assurance of being protected by one of CertainTeed's finest, most durable luxury shingles—and the confidence of knowing that whenever you look up at your roof, you'll see something beautiful.

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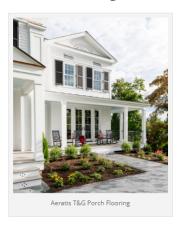
Roofing - Certainteed Grand Manor Architectural asphalt shingles

LANDING and REAR PORCH DECKING

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Products v Requests v Where to buy Installation v Aeratis Porch Gallery Solutions v

Aeratis Heritage

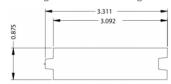


Aeratis Heritage is a true double-sided tongue and groove porch plank that comes in three pre-finished colors, Battleship Gray, Weathered Wood and Vintage Slate. These colored boards are made with slight color variation along with subtle, random streaking to match the richness and depth of natural wood. Heritage, like all the other Aeratis products, can be painted or stained any color, any time in the future, by following the steps within the Traditions paint instructions.

The Heritage line of products are ADA slip complaint and carry a Class "B" fire rating (more flame resistant than any other competitors' product). This double-sided board offers a finished ceiling look from the underside of a porch floor that is visible from underneath.

Aeratis Heritage T&G porch flooring board dimensions are 3-1/8" x 7/8" and are available in 12', 16' and 20' lengths and come 1" longer than published length. As seen above from left to right: Battleship Gray, Weathered Wood and Vintage Slate. The Aeratis products have the appearance of wood and natural color variation.

Aeratis Heritage T&G Porch Flooring Dimensions



Lengths: 12', 16', or 20' Width: 3-1/8" (3.092) Thickness: 7/8"



PVC - Exterior Trim Boards









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Trimboard

PVC Trim – It's what we do best!. At VERSATEX, we are dedicated to cellular PVC trim and are leaders in innovation, quality, and technical assistance in the building industry. For you, that translates to thickness tolerances that are half the industry norm and the continued development of revolutionary products. You also receive the best technical assistance available, with on-site engineers, installation information, and a best practices manual. Because PVC trim is what we do best, we offer unrivaled product quality, service, and expertise.

Stealth Casing w/ J-Channel

PVC Board profiles include:

Trimboard
Trim w/ Flange
Standard Stealth
Stealth w/ Flange

WINDOWS - Wood Clad Andersen 200 series



PRODUCT OVERVIEW



TILT-WASH DOUBLE-HUNG WINDOWS

200 Series tilt-wash double-hung windows are available in our most popular sizes and wood interiors. Their tilt-wash design makes them easy to clean from inside the home.



GLIDING WINDOWS

200 Series gliding windows feature low-maintenance exteriors and real wood interiors. They have a single sash that glides horizontally to allow for full top to bottom ventilation and are an excellent choice for rooms that face walkways, porches or decks because the sash do not open outward.



To learn more about other Andersen® window options, visit andersenwindows.com/windows.



ENERGY-SAVING GLASS FOR ANY CLIMATE

Andersen makes windows and patio doors with options that make them ENERGY STAR[®], 6.0 certified throughout the United States. Visit andersenwindows.com/energystar for more information and to verify that the product with your glass option is ENERGY STAR certified in your area.



LOW MAINTENANCE, NEVER NEEDS PAINTING

The Perma-Shield® exteriors on Andersen® 200 Series windows and patio doors offer superior weather resistance and are virtually maintenance free.

BUILT FOR YEARS TO COME*

Our products are built strong to last long: We use the right materials in the right places, giving our windows and doors superior strength, stability and long-term beauty.

QUALITY SO SOLID, THE WARRANTY IS TRANSFERABLE

OWNER2OWNER



Marc Elrich
County Executive

DEPARTMENT OF PERMITTING SERVICES

Mitra Pedoeem

Director

HISTORIC AREA WORK PERMIT APPLICATION

Application Date: 7/5/2022

Application No: 998984

AP Type: HISTORIC Customer No: 1440629

Affidavit Acknowledgement

The Homeowner is the Primary applicant
This application does not violate any covenants and deed restrictions

Primary Applicant Information

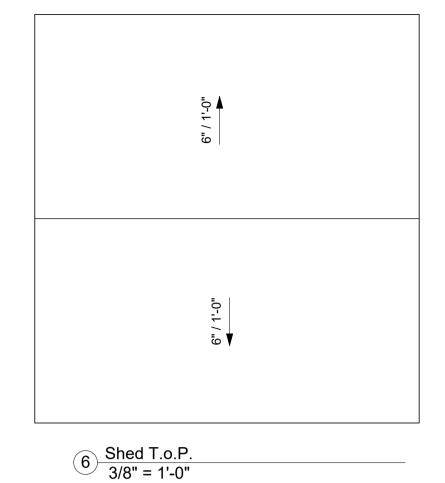
Address 3932 WASHINGTON ST KENSINGTON, MD 20895

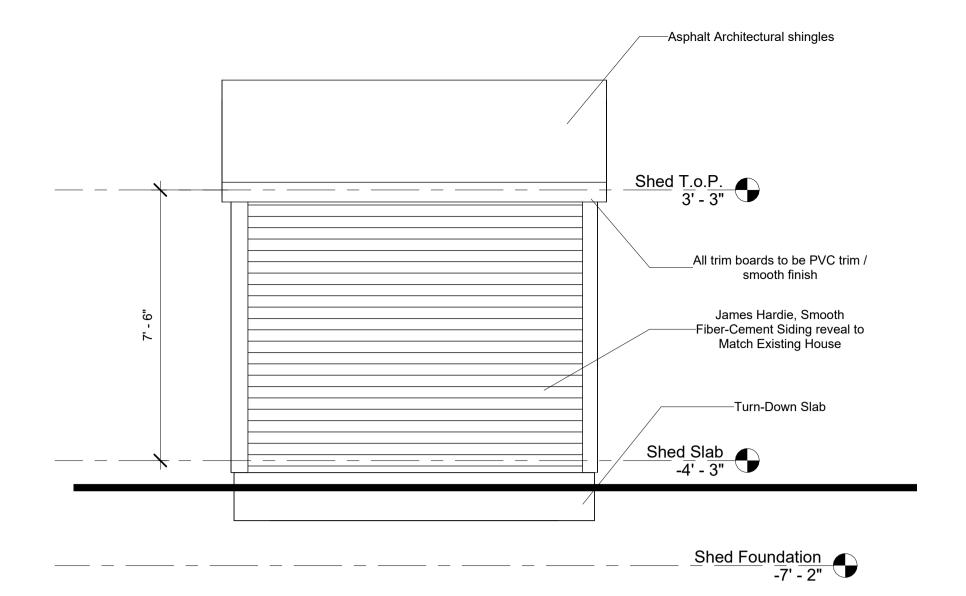
Homeowner Bujak (Primary)

Historic Area Work Permit Details

Work Type ADD

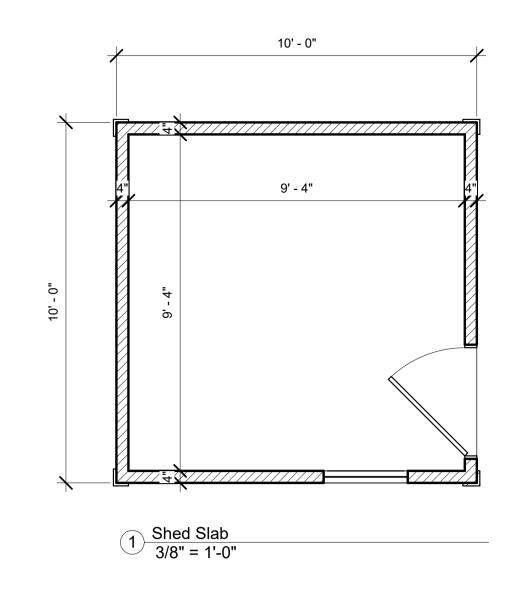
Scope of Work Build in-ground 18'x36' pool and 6' fence.

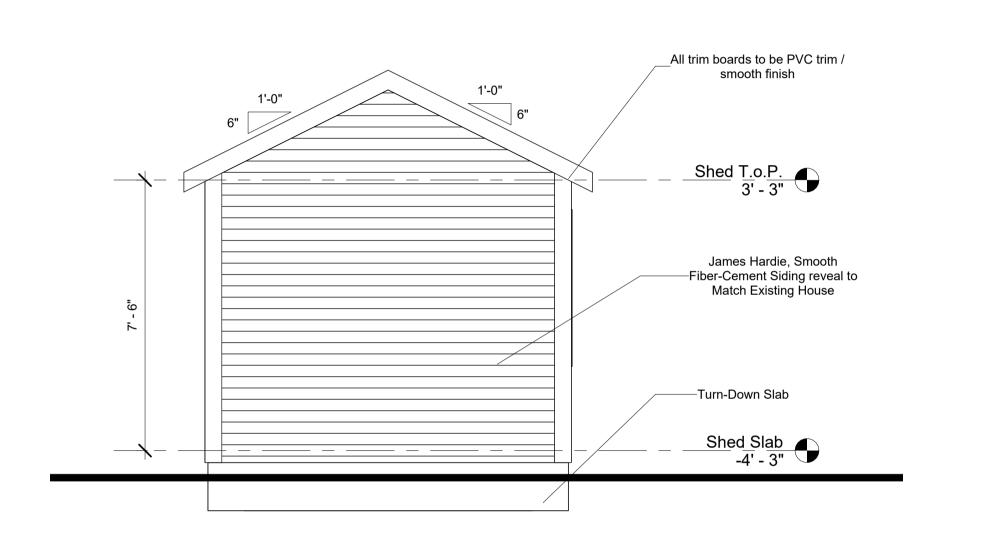


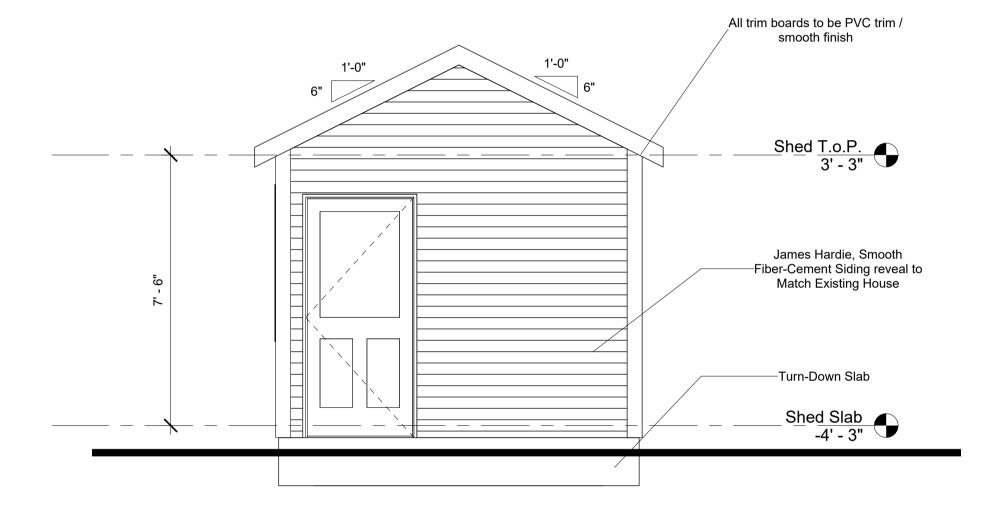


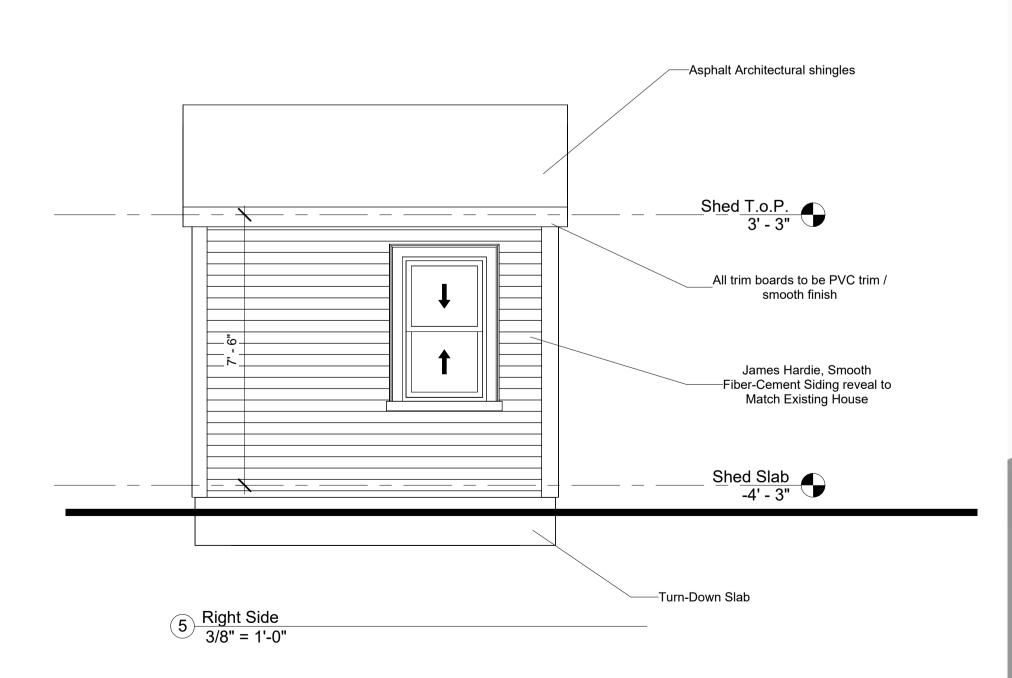
4 Left Side 3/8" = 1'-0"

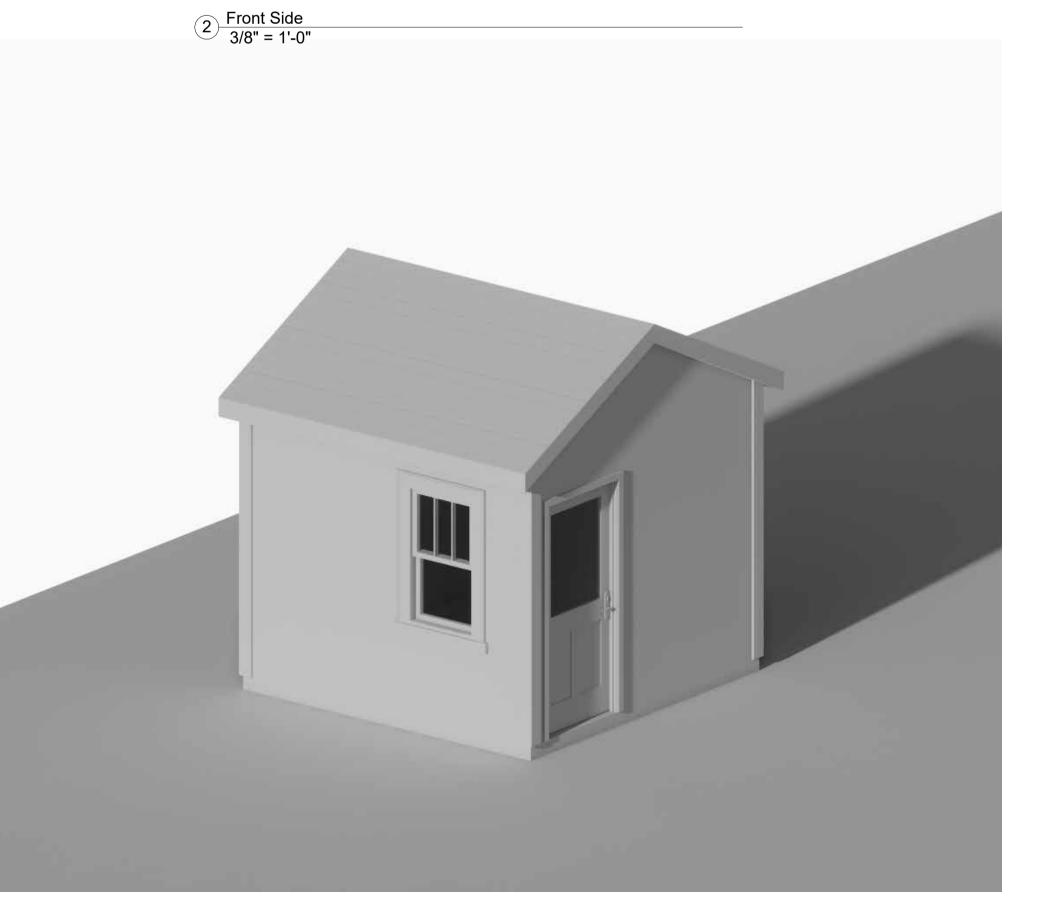
3 Rear Side 3/8" = 1'-0"

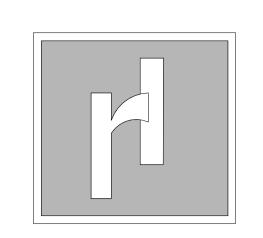






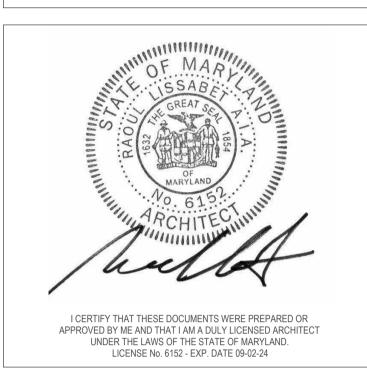






RAOUL LISSABET, A.I.A. ARCHITECTS, LLC

19021 SEDLEY TERRACE GAITHERSBURG, MD. 20879 TEL: (301) 948-3197 e-mail: rlissabet1@comcast.net



	Revisions	
#	Date	

MR. & MRS. SCHWABE

Location

3930 WASHINGTON ST KENSINGTON, MD 20895

Project:

RESIDENCE ADDITION

Drawing Title:

Shed Plans

wn by

Project No. 110522-E2

C.G.

HPC SUBMISISON (07/26/2023)

800A