

**Britta Tonn**  
56 Maple Street  
Winooski, VT 05404  
[brittfenn@gmail.com](mailto:brittfenn@gmail.com) (802) 522-8259

January 30, 2017

Mr. Douglas Viehmann, AIA  
G V V Architects, Inc  
284 S Union Street  
Burlington, VT 05401

**Subject: Supplemental Historic Resources Report for “The Vaults”**  
400 Pine Street and 30-32 Howard Street  
Burlington, VT 05401

Dear Mr. Viehmann:

Based on the staff comments received in advance of the January 31, 2017 Development Review Board hearing, additional information regarding the potential impact of the proposed project on historic resources is provided below.

**Statement of the effect of the proposed redevelopment on the architectural and historical qualities of other structures and the character of the neighborhood around the sites (Development Review Standard D):**

The proposed project will have no adverse effect on the architectural and historic qualities of other structures and the character of the neighborhood around the site.

The proposed development project is located in the southeast corner of the National Register-eligible Pine Street Historic District. The Pine Street Historic District, which encompasses the structures in the surrounding neighborhood to the north and west of the proposed project, is eligible for listing on the National Register of Historic Places under Criterion A due to its “association with events that have made a significant contribution to the broad patterns of our history.” These surrounding structures within the District were all part of the E.B. and A.C. Whiting Brush Company factory, which was historically significant as a leading manufacturer of brushes in the early through mid-20<sup>th</sup> century. The removal of just two former storage structures within the factory complex means that a majority of the industrial buildings associated with the former Whiting Brush Company factory will be retained. Specifically, the buildings to be retained within the factory complex are those where the Whiting Brush Company factory’s most historically significant manufacturing activities occurred: the cutting, combing dressing and dyeing of brush fibers. Several former storage buildings, the building housing the company’s offices and a former packaging and shipping building will also be retained. Because a majority of the factory will remain intact, the proposed new building will not adversely affect the historical significance of the factory complex, nor will it disrupt one’s ability to interpret the property as a former factory complex.

The set-back location of the proposed new building in the southeast corner of the Pine Street Historic District will reduce its visibility within the Pine Street industrial corridor. The Pine Street neighborhood already consists of a mix of historic and modern buildings of varying heights up to four stories. Considering the fact that the Pine Street neighborhood presently features a diversity of architectural styles, including many modern intrusions, the proposed new building is not out of character with its surrounding neighborhood. It is important to note that the Pine Street Historic District’s National Register nomination is based upon the aforementioned National Register Criterion A only and not on Criterion C, which would

require that its collection of buildings and structures “embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.” The decision to not nominate the Historic District under Criterion C recognizes the fact that the Historic District has undergone continual physical transformation and that the historic significance of the District outweighs its architectural significance. This point relates to the previous conclusion that the ability to interpret the property as a former factory will not be disrupted by the proposed new building.

However, recognizing that it is important to preserve an industrial aesthetic within this historically industrial neighborhood, the new building has been designed to be compatible with its historic surroundings. In doing so, the building will have as minimal a visual impact as possible on the architectural qualities of other structures in the surrounding area. For example, the building’s flat roof, rectilinear form, symmetrical fenestration and bands of windows, and various metal and brick cladding are reflective of and compatible with the architectural features of the surrounding buildings while avoiding, through its clear modern aesthetic, the creation of a false sense of history. In addition, the design of the new building evokes features of the three buildings to be removed: the corrugated red metal siding seen on the existing northerly storage building; the seven large openings on the ground floor of the western façade of the new building to represent the seven doorways on the existing Vaults building; the new entrance to the studios and offices from the same, westerly alleyways that are currently used to access the existing buildings; the separate entrance to the residential units fronting Howard Street with the approximate same setback as the existing duplex; and the flat roof of the structure to reflect the flat roof of the existing duplex. These design features help to root the building in its surroundings in an effective and harmonious way. The scale of the building is likewise compatible with other industrial buildings in the surrounding area and will be very similar in height to the building located at the corner of Pine and Howard Streets (approximately 40 feet).

The final discussion regards the proposed redevelopment’s potential effects on the historical and architectural qualities of the Howard Street neighborhood, which features a collection of buildings listed on the State Register of Historic Places. Although one existing duplex within this residential neighborhood will be removed, 30-32 Howard Street, this duplex was historically associated with the Whiting Brush Company property. The reinstatement of the two residential units on the Whiting property within the proposed new building reinforces the duplex’s unique historical association with the property and, as such, does not adversely affect the historic integrity of the Howard Street residential neighborhood.

In addition, the proposed new building has been designed to minimize any potential negative effect on the architectural qualities and general character of the Howard Street residential neighborhood. The siting of the new building with minimal setback from the street will strengthen the street edge and will be consistent with the rhythm and setback of other residential buildings on Howard Street. The street trees in front of the duplex property will be retained to preserve the character of the existing streetscape and buffer views towards the new building from Howard Street to the east. In addition, due to the grade which slopes down Howard Street to the west, the building will have less of an overwhelming quality with respect to the adjacent residential structures. For example, the height of the existing duplex is approximately 25’ above grade; while the proposed new building will be approximately 39’ tall, considering the slope to the west, it will likely not be more than 10’ taller than the existing duplex. Finally, the residential properties to the east of the project area will be protected as the new building is proposed to be located further to the west than the existing buildings to be removed and a buffer will be placed along the eastern property line.