

09-0-1699

(Do Not Write Above This Line)

Z-09-33

AN ORDINANCE
BY: ZONING COMMITTEE

AN ORDINANCE DESIGNATING THE
IMPERIAL HOTEL, LOCATED AT 355
PEACHTREE CENTER AVENUE, NE, LAND
LOT 50, OF THE 14TH DISTRICT OF FULTON
COUNTY, GEORGIA AND CERTAIN REAL
PROPERTY ON WHICH IT IS LOCATED, TO
THE OVERLAY ZONING DESIGNATION OF
LANDMARK BUILDING OR SITE PURSUANT
TO CHAPTER 20 OF THE ZONING ORDINANCE
OF THE CITY OF ATLANTA AND REZONING
FROM SP-1(SA1) / HBS (SPECIAL PUBLIC
INTEREST DISTRICT-1, SUBAREA 1 /
HISTORIC BUILDING OR SITE) TO SP-
1(SA1)/LBS (SPECIAL PUBLIC INTEREST
DISTRICT-1, SUBAREA 1 / LANDMARK
BUILDING OR SITE); TO REPEAL
CONFLICTING LAWS; AND FOR OTHER
PURPOSES: **ADOPTED BY**

DEC 07 2009

COUNCIL

- CONSENT REFER
- REGULAR REPORT REFER
- ADVERTISE & REFER
- 1st ADOPT 2nd READ & REFER
- PERSONAL PAPER REFER

Date Referred 12/05/09

Referred To: ZPB/Zoning

Date Referred

Referred To:

Date Referred

Referred To:

Committee
Date
Chair
Referred To

[Handwritten signatures and dates]

[Handwritten signature]

Date 2009

Chair

Action

Fav, Adv, Hold (see rev. side)
Other

Members

[Handwritten signatures]

Refer To

Committee

Date

Chair

Action

Fav, Adv, Hold (see rev. side)
Other

Members

Refer To

Committee

Date

Chair

Action

Fav, Adv, Hold (see rev. side)
Other

Members

Refer To

Committee

Date

Chair

Action

Fav, Adv, Hold (see rev. side)
Other

Members

Refer To

- FINAL COUNCIL ACTION
- 2nd
 - 1st & 2nd
 - 3rd
 - Consent
 - V Vote
 - RC Vote

CERTIFIED

DEC 07 2009



MAYOR'S ACTION

[Handwritten signature]



09-0-1699

CITY COUNCIL
ATLANTA, GEORGIA

AN ORDINANCE
BY: ZONING COMMITTEE

Z-09-33

AN ORDINANCE DESIGNATING THE IMPERIAL HOTEL, LOCATED AT 355 PEACHTREE CENTER AVENUE, NE, LAND LOT 50, OF THE 14TH DISTRICT OF FULTON COUNTY, GEORGIA AND CERTAIN REAL PROPERTY ON WHICH IT IS LOCATED, TO THE OVERLAY ZONING DESIGNATION OF LANDMARK BUILDING OR SITE PURSUANT TO CHAPTER 20 OF THE ZONING ORDINANCE OF THE CITY OF ATLANTA AND REZONING FROM SPI-1(SA1) / HBS (SPECIAL PUBLIC INTEREST DISTRICT-1, SUBAREA 1 / HISTORIC BUILDING OR SITE) TO SPI-1(SA1)/LBS (SPECIAL PUBLIC INTEREST DISTRICT-1, SUBAREA 1 / LANDMARK BUILDING OR SITE); TO REPEAL CONFLICTING LAWS; AND FOR OTHER PURPOSES.

BE IT ORDAINED BY THE COUNCIL OF THE CITY OF ATLANTA, as follows:

SECTION 1. That the property known as the Imperial Hotel located at 355 Peachtree Center Avenue, NE, Land Lot 50 of the 14th District of Fulton County, Georgia and more fully described in Attachment "A-1" to this ordinance, which attachment is incorporated herein, met the criteria for Landmark Building or Site as set forth in the Nomination Resolution of the Urban Design Commission attached hereto as Attachment "B" and incorporated herein, and is hereby determined to be a Landmark Building or Site pursuant to Chapter 20 of the 1982 Zoning Ordinance of the City of Atlanta, as amended.

SECTION 2. That the 1982 Zoning Ordinance of the City of Atlanta, as amended, is hereby further amended by designating said property described in Attachment "A-1" to the overlay zoning category "Landmark Building or Site" pursuant to Section 16-20.006 of the 1982 Zoning Ordinance of the City of Atlanta, as amended, such that all parts of the site described by the metes and bounds description in Attachment "A-2" and any structure located thereon are so designated.

SECTION 3. That the 1982 Zoning Ordinance of the City of Atlanta, as amended, is hereby further amended so as to provide that the subject property bears, in addition to its SPI-1 (SA1) zoning classification, the overlay zoning designation "Landmark Building or Site", which designation should be officially abbreviated as "LBS" and shall immediately follow the abbreviation for the existing zoning classification. Said property is subject to all zoning regulations contained in the 1982

RCS# 3484
12/07/09
5:34 PM

Atlanta City Council

REGULAR SESSION

MULTIPLE

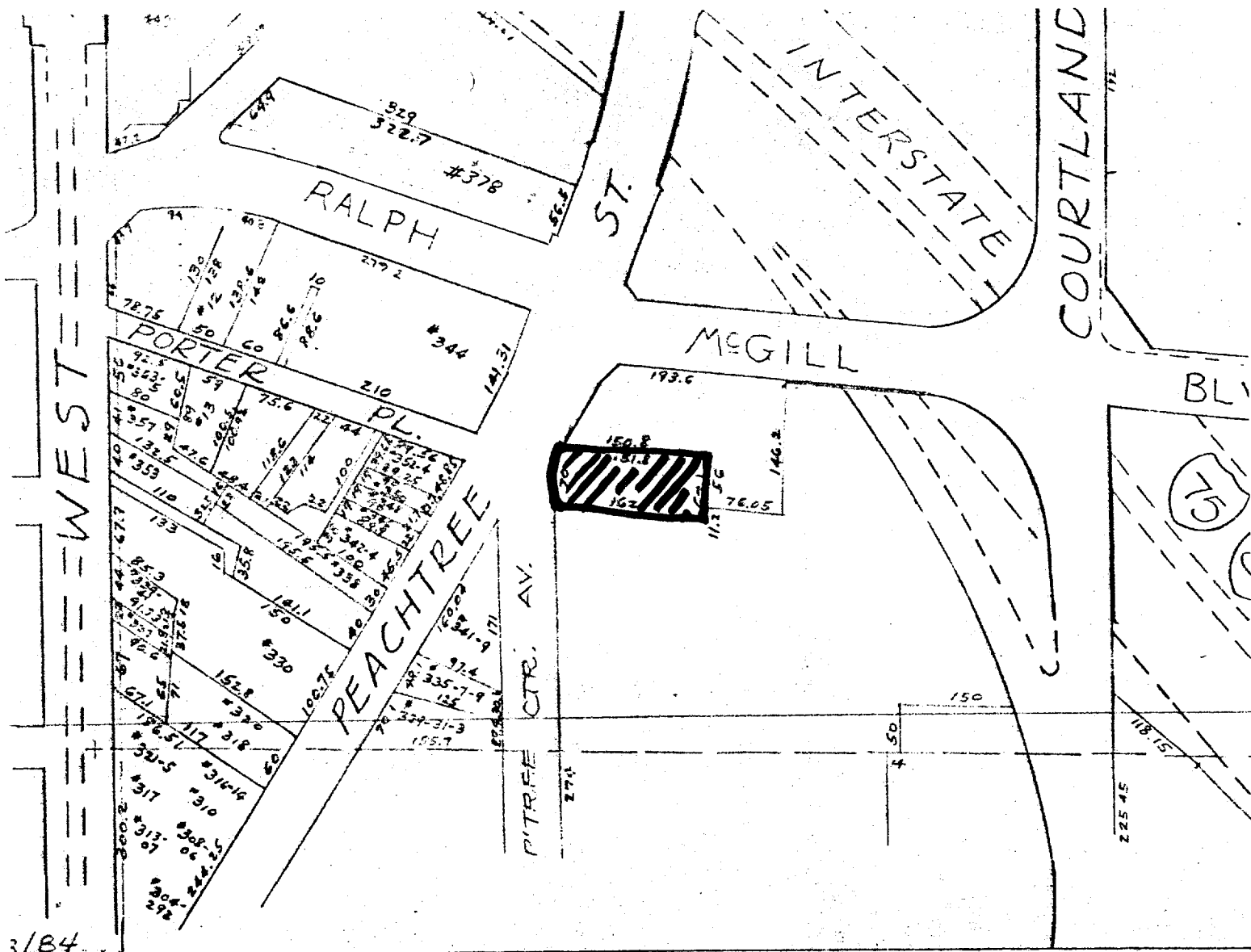
~~09-0-1699, 09-0-1863, 09-0-1799~~

ADOPT

YEAS: 15
NAYS: 0
ABSTENTIONS: 0
NOT VOTING: 1
EXCUSED: 0
ABSENT 0

Y Smith	Y Archibong	Y Moore	Y Mitchell
Y Hall	Y Fauver	Y Martin	Y Norwood
Y Young	Y Shook	Y Maddox	Y Willis
Y Winslow	Y Muller	Y Sheperd	NV Borders

MULTIPLE

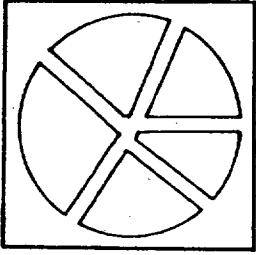


**LEGAL DESCRIPTION
IMPERIAL HOTEL**

ALL THAT TRACT OR PARCEL OF LAND lying and being in Land Lot 50 of the 14th District, City of Atlanta, Fulton County, Georgia and being more particularly described as follows:

BEGINNING at an iron pin found on the southeast right-of-way line of Peachtree Center Avenue (Variable R/W), said iron pin being South 25 degrees 18 minutes 22 seconds West a distance of 69.55 feet from a concrete monument found at the southwesterly end of a miter at the intersection of the southeast right-of-way line of Peachtree Center Avenue and the southerly right-of-way line of Ralph McGill Boulevard (60' R/W); thence leaving the southeasterly right-of-way line of Peachtree Center Avenue and running South 83 degrees 45 minutes 52 seconds East a distance of 151.04 feet to a concrete nail found; thence South 08 degrees 11 minutes 02 seconds West a distance of 56.11 feet to a point; thence South 08 degrees 10 minutes 08 seconds West a distance of 11.00 feet to a point; thence North 84 degrees 20 minutes 13 seconds West a distance of 162.19 feet to an iron pin found on the southeasterly right-of-way line of Peachtree Center Avenue (Variable R/W); thence following said right-of-way line North 17 degrees 17 minutes 04 seconds East a distance of 69.99 feet to an iron pin and the Point of Beginning.

Said parcel containing 10,625 square feet or 0.244 acres of land as shown on an ALTA/ACSM Land Title Survey for Wachovia Bank of Georgia, N.A., Georgia Housing & Finance Authority, City of Atlanta, Atlanta Neighborhood Development Partnership, Progressive Imperial Partners, L.P., Federal National Mortgage Association & Corporation for Supportive Housing by Planners and Engineers Collaborative dated December 8, 1986, last revised October 6, 1995.



ATLANTA
URBAN DESIGN
COMMISSION

ATLANTA CITY HALL
55 TRINITY AVENUE, SW
SUITE 3400
ATLANTA, GEORGIA 30335-0331
(404) 330-6200

N-09-157

RESOLUTION

Whereas, the Acting Executive Director of the Atlanta Urban Design Commission initiated the nomination process by mailing the appropriate Notice of Intent to Nominate to the property owners of the Imperial Hotel pursuant to Subsection (b) of the City of Atlanta Code of Ordinances, Section 16-20.005

Whereas, the Acting Executive Director caused to be conducted extensive research regarding this proposed nomination and has compiled a written report stating the findings and recommendations regarding the historic, architectural and cultural significance of said nomination pursuant to Subsection (d) of said code section, which report, Exhibit "A", is attached to this resolution and is hereby incorporated by this reference; and

Whereas, a public hearing was held by this Commission to consider said nomination after appropriate public notice was provided as required by Subsection (e) of said code section; and

Whereas, this Commission has reviewed and considered said designation report as well as all other testimony, documentation and other evidence presented to it, including the testimony of all interested members of the public and the property owner pursuant to Subsection (e) of said code section; and

Now therefore be it resolved by the Urban Design Commission of the City of Atlanta as follows:

Section 1. That the designation report caused to be prepared by the Acting Executive Director of the Urban Design Commission is hereby adopted by this Commission and shall constitute the Findings of Fact upon which this nomination is based.

Section 2. That the Commission hereby determines that the Imperial Hotel, a map and legal description of which delineating all boundaries is attached hereto as Exhibit "B" and Exhibit "C", respectively, hereby incorporated by this reference, is architecturally, historically, and culturally significant.

Section 3. That the Commission further determines the Imperial Hotel to be eligible for designation to the category of Landmark Building or Site (LBS), with the exceptions as noted above, as meeting, at a minimum, the eligibility criteria set forth in Section 16-20.004(b)(1), specifically including subsections a., b., and c. of this code section. The Imperial Hotel is located at 355 Peachtree Center Avenue, NE in Land Lot 50 of the 14th District of Fulton County, Atlanta, Georgia.

Section 5. That the Commission hereby further determines that said Imperial Hotel meets the criteria set forth in Section 16-20.004(b)(2)a., specifically including those criteria in the following groups: Group I (3); Group II (1), (2), (3), (6), (7), (8), (9), (10), (11); and Group III (1), (2), and (3).

Section 6. That the Commission, having determined that the Imperial Hotel meets or exceeds the criteria as set forth herein, hereby nominates the Imperial Hotel to the category of Landmark Building of Site (LBS) pursuant to Section 16-20.005(e)(3).

Section 7. That the Commission hereby directs the Executive Director to transmit this resolution including all supporting documentation to the Chair of the Zoning Committee of the Atlanta City Council, to the Commissioner of the Department of Planning and Community Development, and to notify by first class mail the owner of the Imperial Hotel.

Approved and nominated by the Atlanta Urban Design Commission on September 9, 2009.


Regina Brewer, Chair
Atlanta Urban Design Commission

IMPERIAL HOTEL

355 Peachtree Center Avenue NE
City of Atlanta, Fulton County, Georgia
Existing Zoning: SPI-1SA1 / HBS (Historic Building / Site)

N-09-157
Proposed Designation:
*Landmark Building/Site -
Exterior*

Description of Boundaries: The property is located on the southeast corner of Ralph McGill Boulevard and Peachtree Center Avenue. A parking lot takes up the northern half of the property; the building is on the southernmost portion of the property. The designation will include the building and the land. See the attached survey drawn December 8, 1986, updated August 3, 1993, prepared by Planners and Engineers Collaborative.

Constructed: 1910

Architect: Edward E. Dougherty Architect, rehabilitation: Smith Dalia Architects
Builder: R.M. Walker Builder, rehabilitation: Gay Construction Company

OVERALL SIGNIFICANCE

The significance of the Imperial Hotel lies in its architectural merit, and in the part the building has played in the commercial development of Atlanta as the city moved northward along the Peachtree Street corridor. It is also important as one of a relatively small number of early 20th century "businessmen's hotels" to survive. In recognition of its significance, the building was individually listed in the National Register of Historic Places on March 31, 1983. On October 23, 1989, it was listed by the City of Atlanta Urban Design Commission as a Historic Building Site.

Architecturally, the building is an excellent example of the Chicago Style of tall buildings in Atlanta. It features a tall, narrow profile (especially when seen from Peachtree Center Avenue), a tripartite exterior design consisting of base, shaft and capital (taken from the form of a column by the early architects of this type of building), extensive bay windows (also a characteristic feature of Chicago Style buildings, but relatively rare in Atlanta), and an internal skeletal frame (also a feature of the Chicago Style).

In the area of commercial development, the Imperial Hotel is significant for the role it played in Atlanta's early 20th century commercial development northward along the Peachtree corridor, and represents the movement of commercial development in the city north from the downtown business district. It was one of the earliest major commercial buildings constructed along the Peachtree corridor north of downtown. As noted by the National Register nomination in 1983:

"The hotel is located on a small unlandscaped lot at the busy intersection of Peachtree Street, Ivy Street (now Peachtree Center Avenue) and Ralph McGill Boulevard (originally Forrest Avenue), just north of downtown Atlanta. It stands amidst a collection of historic buildings that include Sacred Heart Church (1898), The Farlinger (1898) and First Methodist Episcopal Church (1903). Parking lots are located to its north side and rear."

"The Imperial Hotel and its neighbor, the Farlinger (an early twentieth century apartment building), were among the earliest major commercial buildings built along the Peachtree Street corridor north of downtown in the first decade of the twentieth century." At the time the Imperial Hotel was built, it was considered to be on the outskirts of Atlanta, with easy access made possible by the trolley that ran up Peachtree. With the increasing importance of the automobile, the Imperial's location was convenient to the ever-expanding shopping, theatre, and business districts of Atlanta. Other than the demolition of the Farlinger in 1988, the area today remains much as it was in 1983."

ARCHITECTURAL SIGNIFICANCE

As noted in the National Register nomination in 1983:

"The hotel is the work of the noted Atlanta architect, Edward E. Dougherty (1876-1943), a graduate of Cornell University School of Architecture and the Ecole des Beaux Arts in Paris. Dougherty opened an office in Atlanta....During his years in Atlanta and later years in Nashville, Tennessee, he designed a number of important churches, hotels, and other buildings throughout the southeast. His early twentieth century commercial architecture is noted for its innovative use of reinforced concrete as a framing material."

Dougherty was born in Atlanta and received his Bachelor of Arts from the University of Georgia in 1895. He then enrolled in Cornell University, and received a Bachelor of Architecture degree from that school in 1898. Continuing his education, he enrolled in the architecture course at the Ecole des Beaux Arts, and after finishing there took the "grand tour" of Europe. He returned to the United States in 1905, and set up practice in Atlanta. He was elected a "non-Institute" member of the American Institute of Architects (AIA) in 1907. During his time in Atlanta, he designed "several local schools, local dwellings as well as large commissions such as the design for the Imperial Hotel and the Druid Hills Golf Club." (Henrietta O'Brien Ladson, "Edward Emmett Dougherty and the American Renaissance," p. 6) After achieving success in his home city, he moved to Nashville in 1916, where he organized the firm of Dougherty & Gardner in 1918, and continued his successful practice. As his reputation as an architect grew, he received commissions from other locations in the southeast, and opened another office in Knoxville, Tennessee. The partnership with Gardner was dissolved around 1930 and he became senior partner in the firm of Dougherty, Wallace and Clemmons until the early 1940s. Dougherty died in November 1943."

COMMERCIAL DEVELOPMENT SIGNIFICANCE

The Imperial Hotel and the Georgian Terrace Hotel are the oldest of the six remaining high-rise hotels that were built in Atlanta during the first two decades of the twentieth century, both having been constructed in the 1910-1911 time frame. The Georgian Terrace Hotel, located on the corner of Peachtree and North Avenue, was designated a City of Atlanta Landmark Building Site on June 13, 1990. However, the two hotels historically catered to totally different clientele, as the Georgian Terrace attracted the upper-class while the Imperial catered to business travelers.

Construction of the Imperial Hotel predated the Winecoff Hotel (now the Ellis), on the corner of Peachtree and Ellis Streets, by two years, and the Biltmore Hotel, on West Peachtree between 5th and 6th Streets, by thirteen years.

Other early twentieth century hotels that catered to a business-class clientele were the Piedmont, the Ansley and the Henry Grady. The Piedmont Hotel, which opened in 1903, was located at the corner of Luckie and Peachtree Streets. The Henry Grady Hotel was completed in 1924 and demolished in 1972. It was located at the present site of the Westin Peachtree Plaza. The Hotel Ansley was built at the same time as the Winecoff, and located at the corner of Forsyth and Williams Streets. It was taken over by Dinkler Hotels and operated as The Dinkler Plaza in the 1950s. All of them have been demolished, leaving the Imperial Hotel as the sole remaining early twentieth century example of this type of hotel in Atlanta.

Two other high-rise hotels in Atlanta that date from the end of the same early twentieth century time period are located on Ponce de Leon Avenue, rather than the more common Peachtree/West Peachtree corridor. They include the Briarcliff Hotel on the corner of Ponce de Leon and North Highland. Built in 1925, it is now houses senior citizens. The Clermont Hotel, also on Ponce de Leon, was completed in 1924, but was originally built as an apartment building. Both buildings are in need of renovation. The Cox-Carlton, just north of the Georgian Terrace on Peachtree, and the Wynne, on North Highland near Ponce de Leon, were both apartment or residential-type hotels.

Other historic hotels that still exist in Atlanta are of more recent construction and are generally of the motel type rather than multi-story. The three most notable hotels that have been demolished since 1989 are of this type, and include the Cabana at the corner of Peachtree and 7th Streets (2002), the Palamont on Auburn Avenue (2006) and the Castlegate near Howell Mill Road (2002). In a return to the early twentieth century type, and reflecting rising downtown land values, more recent hotel construction in Atlanta has once again been of high-rise construction, of which the Westin Peachtree Plaza (mentioned in a previous paragraph) is an example.

ARCHITECTURAL / RECENT DEVELOPMENT HISTORY

The building is described in the National Register nomination of 1983 as follows:

"The Imperial Hotel is an eight-story, early twentieth century hotel building designed in a variation of the Chicago style. It is located on Peachtree Street at its intersection with Ivy Street (now Peachtree Center Avenue) and Ralph McGill Boulevard, just north of downtown Atlanta, Fulton County, Georgia.

The rectangular, flat-roofed hotel has a reinforced concrete frame and is veneer with red brick inset with terra cotta. Its front façade has a tall, narrow silhouette, subdivided into a tripartite arrangement made up of a projecting first floor, a plainly detailed shaft and a more ornate cap. The projecting first floor brick structure...was built in 1953 (and was removed in the mid-1990s renovation of the building by Progressive Redevelopment and replaced with a replication of the "original open brick arcade with Tudor arches")... The shaft, with its six-over-one double hung sash windows grouped in pairs, is detailed with

spandrels highlighted with decorative brickwork and geometric-shaped terra cotta insets. Between the pairs of windows, vertical pier-like sections rise uninterrupted from the second to the seventh floor where a string-course marks the start of the cap. Wrought iron balconies are located at the windows of the third and eighth floors. The eighth floor, with single larger windows set between decorative brick and terra cotta panels, is surmounted by a corbelled brick cornice and a parapet highlighted with terra cotta. The cornice and parapet continue around the entire south side and a portion of the north side. Both sides of the structure are articulated with seven rows of bay windows which extend as continuous projections from the second to the eighth floors, alternating with rows of small sash windows. These bays are constructed of sheet metal and most retain their original eight-over-one flanked by four-over-one wooden sash windows. A fire escape, smoke stack, and ventilator pipes are affixed to the rear of the building..."

"On the interior, the hotel has public areas on the first floor and in the basement, and hotel rooms above. Two Otis elevators with all their original equipment and a stairwell rise through the building. The first floor contains a lobby, a non-historic coffee shop... and a lounge.... Although extensively remodeled, significant original features remain in the lobby area. These include a Tudor-arched stone fireplace with a central "IH" cartouche...some marble wainscoting; the original tile floor...crown molding around the exposed concrete ceiling beams; an "I" motif in some column capitals; a fanlight above the opening to the lounge area; and stone treads on the stairs leading to the second floor. The lounge area was extensively remodeled following a 1968 fire, but ceiling details remain here too... The basement was finished as a restaurant in 1953. On the upper floors, which remain virtually intact, rooms are organized off both sides of a "T"-shaped central corridor. Detailing is simple and includes simple wood molding around doors and windows, baseboards, picture rails, and transoms above doors. Some of the rooms have built-in window seats in the bay areas. Many of the bathrooms, located between rooms, have their original fixtures and hexagonal tile floors."

Progressive Redevelopment Renovation

At the time (October 23, 1989) the Imperial Hotel was listed by the City of Atlanta Urban Design Commission as a Historic Building Site the renovation of the hotel into low-income apartments by Progressive Redevelopment had not begun. In short, the renovation of the Imperial Hotel, which resulted in the return of the building to its original appearance and significantly increased its architectural integrity, took place after the building was designated as a Historic Building / Site (HBS).

As shown in the attached "before and after" photographs, the building had deteriorated seriously by 1994. The Imperial Hotel was rehabilitated in 1995-1996 by Progressive Redevelopment, Inc. as affordable apartments for low-income tenants. The renovation was certified by the State of Georgia and National Park Service in 1997.

The rehabilitation of the building included repair of historic material including the exterior brickwork, wrought iron balconies and replacement of the arched brick arcade on the Peachtree elevation of the building. A non-historic projecting brick structure was added to the first floor in 1953 on the west (Peachtree Street) elevation. This addition was removed and replaced with a

replication of the "original open brick arcade with Tudor arches." Please refer to **Attachment 9**, which is a c.1917 photograph of the building, and compare that to **Attachment 10**, which shows the same elevation before (1994) and after (1997) the renovation. **Photo #1** shows the same elevation in 2009. Progressive Redevelopment used historic photographs like **Attachment 9** in order to replicate the original arcade fronting on Peachtree Street and restore the building to its historic appearance.

The owner renovated the rest of the building, which had been allowed by the previous owner to deteriorate to a near-dangerous condition. **Attachment 11** shows the north elevation of the building before (1994) and after (1997) the renovation. **Photo #5** and **Photo #6** show the north elevation in 2009.

Other non-historic additions were also removed. Interior work included repair or replacement-in-kind of most historic finishes in the first floor entrance lobby and the second floor corridor. In addition doors on the second floor, while new to meet smoke and fire ratings, were designed to replicate the original doors. Except for floors 2, 3 and 4 on the Peachtree Street elevation, most windows were replaced as they had deteriorated beyond repair. The metal spandrel panels and trim on three of the bays were restored, including the use of salvaged wood windows. On the upper floors minor alterations were made to create apartments, including kitchens and re-working of baths.

Although the interior of the building is not included in the Landmark Building Site nomination for the Imperial Hotel, it is worth noting that Progressive Redevelopment also removed non-historic additions, retained historic fabric and returned the lobby area of the hotel to a more appropriate appearance. Two 1994 photographs of the lobby area before the renovation are shown in **Attachment 12**, and contrast sharply with the current photo shown in **Attachment 13**. The quality of the interior renovation, although not part of the nomination, has also significantly increased the architectural integrity of the Imperial Hotel.

Criteria for a Landmark Building:

Group I – Historic:

3. A building or site associated with an extremely important cultural pattern or social, economic or ethnic group in the history of the city, the state or the nation.

Group II – Architectural:

1. A building or site that clearly dominates or is strongly identified with a street scene or the urban landscape.
2. A building or site which is the work of an exceptionally important master architect or builder.
3. A building or site which is an exceptionally fine example of a style or period of construction that is typically of the City of Atlanta.
6. A building or site whose design possesses exceptionally high artistic values.
7. A building or site whose design exhibits exceptionally high quality craftsmanship.
8. A building or site associated with an exceptionally significant technology or method of construction, including the use of materials in a significant way.
9. A building or site which has an exceptionally high degree of integrity.

10. A building or site which has virtually all character-defining elements intact.
11. A building or site whose original site orientation is maintained.

Group III – Cultural:

1. A building or site that has served at a major, city-wide scale as a focus of activity, a gathering spot, or other specific point of reference in the urban fabric of the city.
2. A building or site by its location is broadly known or recognized by residents throughout the city.
3. A building or site which clearly conveys a sense of time and place and about which one has an exceptionally good ability to interpret the historic character of the resource.

FINDINGS

The proposed nomination of the Imperial Hotel meets the above-referenced criteria, as well as the minimum criteria for a Landmark Building or Site as set out in Section 16-20.004(b) (1) a., b., and c. of the Code of Ordinances of the City of Atlanta.

Bibliography

Sources for the architectural description, historic narrative, and commercial significance contained in this nomination were a "National Register of Historic Places Inventory-Nomination Form" prepared by Carolyn Brooks, National Register Researcher, Historic Preservation Section, Georgia Department of Natural Resources, February 11, 1983. Additional information is found in a "Historic Preservation Certification Application-Part 1, dated September 18, 1981, and in "Historic Preservation Section Staff Notes" from November 1981. These documents are available at the Historic Preservation Division (HPD), Georgia's State Historic Preservation Office, located at 34 Peachtree Street NW.

Sources for Edward E. Dougherty included "Edward Emmett Dougherty and the American Renaissance" by Henrietta O'Brien Ladson, thesis submitted to the Faculty of the Graduate School of Vanderbilt University, December, 1990. A copy is available in the Edward E. Dougherty architect's file at HPD.