



MONTGOMERY COUNTY PLANNING DEPARTMENT
 THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MCPB
Item #11
3/6/08

MEMORANDUM

DATE: February 26, 2008

TO: Montgomery County Planning Board

FROM: Clare Lise Kelly, Research & Designation Coordinator (301-563-3402) *CLK*
 Historic Preservation, Countywide Planning Division

VIA: Scott Whipple, Historic Preservation Supervisor *SW*
 Gwen Wright, Division Chief *GW*
 Countywide Planning Division

SUBJECT: **Public Hearing (Preliminary) Draft Amendment**
to the *Master Plan for Historic Preservation: Individual Resources*

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ATTACHMENTS:
 MASTER PLAN AMENDMENT
 RESEARCH FORMS/PHOTOGRAPHS
 CORRESPONDENCE

STAFF RECOMMENDATIONS
 Recommend to the County Council that the following resources be designated on the *Master Plan for Historic Preservation*:

- B&O Culverts and Railroad Bed (c1865-1873), Vicinity of Harvest Glen Way, Germantown #19/40, *Locational Atlas and Index of Historic Sites*
- Little Seneca Viaduct (c1865-73; 1896), Vicinity of Wisteria Drive, Germantown #18/44, *Locational Atlas and Index of Historic Sites*
- Burton Log House (c1800; c1850), 15107 Birmingham Drive, Burtonsville #34/14, Nomination by property owner
- Susan B. Chase House (1903-4), 4717 Drummond Avenue, Chevy Chase #35/160, Nomination by property owner
- Seymour Krieger House (1958), 6739 Brigadoon Drive, Bethesda #35/161, Nomination by property owner

Recommend to the County Council that the following resources not be designated on the *Master Plan for Historic Preservation*:

- Germantown Presbyterian Church (1900), 19431 Walter Johnson Road, Germantown #19/13-8, Nomination by citizen group
- Watson House (1918), 9206 Watson Road, Silver Spring #36/55, Nomination by citizen group

BACKGROUND

In order to evaluate and protect historic resources in Montgomery County, and in accordance with the Montgomery County Preservation Ordinance, staff initiates amendments to the *Master Plan for Historic Preservation*. Many of these amendments are created in coordination with the Planning Department's updates of area master plans. The Germantown area resources in this Amendment are being reviewed because the Germantown Master Plan is being updated. The other five resources in this Amendment are nominations by property owners and interested parties. Two of the Germantown resources under review (#18/44 and 19/40) are already identified on the *Locational Atlas and Index of Historic Sites*; the remaining five are not identified on the *Locational Atlas*.

On December 19, 2007, the Historic Preservation Commission held a public meeting and worksession on this Amendment and the HPC formulated recommendations on six of the seven resources. At the request of the property owner, the HPC held an additional worksession on January 9, 2008, to evaluate the Watson House (#36/55). According to standard practice, HPC staff transmitted to the HPC one week prior to the HPC meeting a staff report and all correspondence received to date. Correspondence received after transmittal of the staff report and before the meeting was presented to Commissioners prior to their meeting. If testifiers brought sufficient copies, material at the hearing was distributed to the Commissioners. All materials received since the final worksessions was added to the record for the Planning Board and is included with this report.

The HPC recommendations for all seven resources are in agreement with staff recommendations and are reflected in the enclosed Preliminary Draft Amendment. The Planning Board will hold a public hearing and worksession and transmit their recommendations to the County Council. The County Council makes the final decision on designation of historic sites.

The Planning Board packet includes the *Amendment to the Master Plan for Historic Preservation* that summarizes the Atlas resources and nominations. Also included are the Maryland Historical Trust inventory forms, photographs, and maps for each resource. The packet also includes correspondence and other written material received.

RESOURCES RECOMMENDED FOR DESIGNATION ON THE MASTER PLAN FOR HISTORIC PRESERVATION

B&O CULVERTS AND RAILROAD BED (c1865-1873), VICINITY OF HARVEST GLEN WAY, GERMANTOWN #19/40, *LOCATIONAL ATLAS AND INDEX OF HISTORIC SITES*

This resource, and the following resource #18/44, present a rare opportunity to preserve the original single tracked railroad bed and engineering features associated with the first phase of the B&O Railroad. These two sections of abandoned track may well be the only remaining undisturbed sections of the rail line in Montgomery County.

Resource #19/40 consists of an abandoned railroad bed and two stone culverts and is located immediately south of Harvest Glen Way. The Planning Board added this resource to the *Locational Atlas* in 2000, at the request of the Germantown Historical Society. The Planning Board had approved a 114-unit townhouse development,

Autumn Glen, located between the existing CSX tracks and the abandoned B&O tracks. The developer entered into an agreement with the Planning Board which included the installation of interpretive markers and preservation of the railroad bed for a walking trail. As part of this agreement, the north culvert was removed for the construction of a stormwater management pond, and recreated re-using some of the original Black Rock stones. This structure no longer functions as a culvert but is a display of stones banked into the railroad bed and representing the original culvert. Additional stones from the original north culvert are in storage at Black Hill Regional Park. Some of these stones will be used as a historical display at the new Darnestown Heritage Park. The south culvert is approximately 20 feet long, constructed of handhewn granite and Black Rock stone.

The Baltimore and Ohio Railroad's Metropolitan Branch was important to the history of Montgomery County in ways that include economic development, suburban growth, and tourism. This line, which runs from Washington, DC, to Point of Rocks, Maryland, became the main route west for trains coming from Washington and Baltimore. There are four main periods of history for the railroad: the founding (1853-73); the early years (1873-90); the age of improvement (1890-1927); and modernization (1927-50). The Metropolitan Railroad was founded in 1853 and went bankrupt during the Civil War. The B&O Railroad took over the building of the line, using surveys made by the original company. Construction of this railroad line was begun in 1865 and completed in 1873. The Metropolitan Branch was recognized as a major engineering feat of its time, with structures large and small considered excellent in design and construction.

The Stone Culverts and Abandoned Railroad Bed, Resource #19/40, represent the first era of the Metropolitan Branch (1853-1873). The Metropolitan Branch was originally a single track rail line. This section of the line was abandoned in 1927 when the line was straightened and double-tracked. Because it was no longer in use, the culverts and single rail width bed have been preserved. The engineer is believed to have been James A. Boyd, the contractor for the first section of the line, who set up camp where the eponymous town was later established.

This resource, including the railroad bed and both culverts, is on land owned and maintained by the Autumn Glen Homeowners Association. In accordance with the Planning Board agreement, the AGHA has established a walking trail, with historic markers located at each culvert. The record includes one letter of support and no letters in opposition to designation of this resource.

Staff recommends this resource be designated on the *Master Plan for Historic Preservation*, under criteria 1a, 1d, and 2a. The recommended setting is the parcel of land on which the resource is located, as shown on the map in the Amendment.

LITTLE SENECA VIADUCT (c1865-73; 1896), VICINITY OF WISTERIA DRIVE GERMANTOWN #18/44, LOCATIONAL ATLAS AND INDEX OF HISTORIC SITES

The Little Seneca Viaduct, Resource #18/44, was identified on the original *Locational Atlas* of 1976. This resource includes three main elements that represent the first two periods of history for the railroad. The elements are: an abandoned railroad bed dating from c1865; stone rip-rap wall from the foot of the original 1872 wood trestle viaduct that traversed Little Seneca Creek; and the remains of the metal bridge viaduct that replaced the wooden one in 1896. This resource is located approximately midway between Boyds and Germantown.

The abandoned single-track railroad bed, cut into the hillside, represents the first era of the Metropolitan Branch (1853-1873). The double tracking of the Metropolitan Branch was begun in 1890. The Germantown section was the last to be double tracked. Because of the rough terrain in the Germantown area, the curved and single track remained in use until 1927. Because it was no longer in use, the single rail-width bed has been preserved. The railroad bed leads from Wisteria Drive to the Little Seneca dam. It is currently being used as an access road to service the dam. The road is closed to the public. While the railroad bed section in Resource #19/40 runs along relatively flat land, this section of the old railroad line had to be cut into a hillside.

A wooden trestle viaduct was built over Little Seneca Creek in the early 1870s. The only visible remains of that earlier bridge are the stone retaining walls—which the B&O referred to as ‘riprap’—at the base of the fill on the east bank of the river. A metal viaduct replaced the wooden trestle bridge in 1896. Both of these bridges were single-tracked and built on a sharp (4 degree) curve which added to the difficulties in their construction. The 1896 viaduct was designed by John E. Greiner (1859-1942), Baltimore & Ohio’s Engineer of Bridges. The metal viaduct served until 1928, when the line was re-located and double-tracked. During its period of service, it was on one of the major rail lines into the Nation’s Capital, and it became the B&O’s main line from Baltimore to the west. The viaduct remains consist of one large stone end abutment and four stone piers. The abutment is approximately 31 feet wide and 12 feet long. The structure stands some 12 feet above grade at its exposed end. There are two dates chiseled in the abutment, “6.17.96” and “10.13.96”. These dates probably represent the periods of construction of the stonework. The newspaper accounts indicate the bridge was constructed during the period June-December 1896.

In 1980, a dam was constructed for a reservoir, creating Little Seneca Lake. The dam was built in the center of the viaduct site that had been surveyed in the 1970s. The construction of the dam removed the western section of the viaduct site, including the west stone abutment and stone piers on what was the west slope of Little Seneca Creek. In an interagency agreement made June 22, 1982, M-NCPPC owns and operates the access road, while WSSC maintains and operates the dam. The abandoned railroad bed is owned by M-NCPPC, and the viaduct site and rip-rap wall, located adjacent to the dam, are located on WSSC property.

The Little Seneca Viaduct is a rare surviving example of the original single-tracked railroad bed and engineering features of a wooden trestle bridge and metal viaduct. It is one of the last remaining undisturbed sections of the rail line in Montgomery County, and represents the engineering accomplishments of the B&O Railroad.

The record includes one letter supporting designation and no letters of opposition for this resource.

This resource, including the viaduct, rip-rap wall, and railroad bed, meets criteria 1a, 1d, and 2a. The recommended environmental setting includes stone end abutments, stone piers, stone retaining wall, and the railroad bed, now used as an access road from Wisteria Drive to the Little Seneca Lake dam.

BURTON LOG HOUSE (c1800; c1850), 15107 BIRMINGHAM DRIVE, BURTONSVILLE #34/14, NOMINATION BY PROPERTY OWNER

The Burton Log House has been nominated for designation by its owner, Kenneth Lourie. Though the Burton House was not identified on the original *Locational Atlas*, the resource was identified as a significant structure in a 1976 survey by architectural historian Orin Bullock. The resource escaped further notice by the preservation community until 1996 when PAC Spero investigated it for an Inter County Connector study. This study found that the Burton House is eligible for National Register designation.

The Burton House is significant architecturally as an early Maryland house and historically for representing the settlement era of the Burtonsville community. The house is situated near the headwaters of Little Paint Branch, along the Prince George’s County boundary. The west log section was a c1800 one-room structure, 16’ x 21’, with a loft above. The east section is post and beam construction, likely dating to c1850, containing a box staircase built into the north side of the chimney.

Tax records indicate the house was built c1800. Hence the original log house was built before the Columbia Turnpike Company constructed a road from Georgetown to Ellicott’s Mills (1810). The Burton family settled here in 1817, first Basil and then his son Isaac Burton, Sr. owning the land. Isaac Sr, who acquired the property in 1825, is considered the founder of Burtonsville. By 1850, when the east wing was built, a crossroads community known as Burtons was established at the intersection of the Columbia Turnpike and the Laurel-Sandy Spring Road. In 1851, Isaac Sr. conveyed 51¾ acres of his property, including this dwelling, to his son

Isaac Jr. Maps of 1865 and 1879 show Isaac Burton residing here, likely referring to Isaac Jr. The property remained in the family until 1947 when it was sold by Isaac Jr.'s daughter Mary Hearn.

Though it is not known if Isaac Sr. ever lived in this house, its historical association with him and his son, together with the rare survival of Burtonsville resources, combine to make this a significant resource to the history of the Burtonsville community. Burtonsville remained small and rural after the Civil War. It had a population of about 50 people, with resources including a Baptist church, blacksmith shop, schoolhouse, and a store.

The Burton House has had some alterations. Most windows are casement and fixed sash that appear to date from the early 20th century. Dormer windows were constructed on the original log section, likely when the loft was made into a second story. The front porch has a concrete deck. An early east addition has a stone foundation. A more recent south addition has concrete block foundation and chimney. Nonetheless, the resource retains the character-defining features of early Montgomery County houses, including the steeply pitched roof, log construction, and brick chimney.

There has been no opposition to the proposed designation of this resource.

The resource meets criteria 1a, 1d, and 2a. The recommended environmental setting is Lot 1, Block D; being 2.06 acres. A wood frame stable built c1895 is a contributing resource.

SUSAN B. CHASE HOUSE (1903-4), 4717 DRUMMOND AVENUE, CHEVY CHASE #35/160, NOMINATION BY PROPERTY OWNER

The Susan B. Chase House has been nominated by its owner for designation on the *Master Plan for Historic Preservation*. Located at 4717 Drummond Avenue, in the Drummond subdivision, immediately north of Somerset. Built in 1903-4, the Susan B. Chase House is among the earliest, if not the first, houses to be designed and constructed in the Drummond Subdivision.

The Drummond Subdivision was platted in 1903. Drummond is representative of the many subdivisions in the greater Chevy Chase area that were established by independent entrepreneurs riding on the success of the Chevy Chase Land Company. Others include Otterbourne, 1893; Norwood Heights, 1893; and Griffith's Additions, later Martin's Additions, 1904. Drummond had originally been part of an extensive estate and was subdivided around the time of the development of the nearby electric rail service on the Georgetown and Rockville line. Accessible and regular rail service allowed the upper-middle class to reside in a rural setting and still easily commute to work in the District of Columbia.

Architecturally, the Susan B. Chase House is representative of other Drummond houses built during the period of transition between the asymmetrical, showy Queen Anne style of the late 19th century and a more conservative, symmetrical Colonial Revival of the 20th century. The residence, as the nominator has suggested, does provide an important contribution to an understanding of suburban Montgomery County residential architecture at the turn of the twentieth century.

Staff recommends that the Chase House be designated for representing the Drummond community and its architecture. There is precedent for such a designation. In Chevy Chase, Takoma Park, Hyattstown and Dickerson, single structures were designated as individual sites before the communities were evaluated for -- and in each of these cases, ultimately -- designated as historic districts. In Otterbourne, nine individual houses were designated that represent the settlement period of this community. These houses, built between 1894 and 1914, were found to represent the greater community. Like the Otterbourne subdivision, in Drummond there was an initial building campaign during which a group of houses were constructed. In Drummond this period was 1903 to 1916. During this period, sixteen houses were built, of which the Chase House is the first or possibly second. Staff agrees with the nominator that the Susan B. Chase House is representative of the first group of houses that were constructed at Drummond.

Staff participated in a Drummond community meeting and has spoken individually with several Drummond residents. Interest has been expressed in the nomination of additional houses in Drummond and/or a Drummond Historic District. Staff recommends a review of the community in its entirety, preferably by a preservation consultant, in lieu of reviewing a series of additional individual nominations over an extended period of time.

Staff recommends designation of the Chase House, finding that it meets criteria 1a, 1d, and 2a. The recommended environmental setting is Lot 36, Subdivision 22, being 12,400 square feet.

SEYMOUR KRIEGER HOUSE (1958), 6739 BRIGADOON DRIVE, BETHESDA #35/161, NOMINATION BY PROPERTY OWNER

The Seymour Krieger House was constructed in 1958 to the designs of the internationally renowned architect Marcel Breuer. The structure is the only single-family dwelling designed by Marcel Breuer in Montgomery County, and is one of only four residential buildings he designed in Maryland. The residence was built for Seymour Krieger, a communications lawyer, and his wife Rita. The Krieger family continued to live here until 1964.

The resource is an outstanding example of the International Style. Every aspect of the architectural and landscape designs of the Seymour Krieger House has a specific function, an ideal promulgated by the International Style. The triangular-shaped corner lot was landscaped by prolific landscape designer Dan Kiley. The project was the first of five collaborations between Breuer and Kiley nationwide, and was one of only two projects these distinguished designers worked together on in Maryland.

The Seymour Krieger House is a landmark in the area. It is an established and familiar visual feature due to its singular physical characteristic and landscape. Staff notes a comparable, and equally notable building is the Frank Lloyd Wright designed house at 7927 Deepwell Drive, Bethesda, built in 1957, and designated on the Master Plan for Historic Preservation. Built within a year, these two residences are within a half mile area, on the east bank of Cabin John Creek. Like the Wright house, Breuer's house is only residence in the county designed by that master architect.

The Krieger House is also being evaluated for National Register designation and has been recommended favorably by the Historic Preservation Commission and the Governor's Consulting Committee.

Staff agrees with the nominator that the resource meets criteria 2a, 2b, 2c, and 2d. The recommended environmental setting is Lot P19, Block E, being 32,567 square feet.

RESOURCES NOT RECOMMENDED FOR DESIGNATION ON THE MASTER PLAN FOR HISTORIC PRESERVATION

GERMANTOWN PRESBYTERIAN CHURCH (1900), 19431 WALTER JOHNSON ROAD, GERMANTOWN, #19/13-8, NOMINATION BY CITIZEN GROUP

This resource has been nominated by the Germantown Historical Society, under criteria 1a, 1d, 2a, and 2d. The owner opposes designation. The Germantown Presbyterian Chapel was built in 1900. Prior to its construction, the closest Presbyterian church was the Neelsville Church on Frederick Road. The church bell was used as a general town alarm, as well as announcing church services. The bell, made by the American Bell and Foundry Company of Michigan, weighed 500 pounds. This church was one of two churches built during this era. The other church was destroyed by fire in the 1980s. The Germantown Presbyterian Church closed in 1936, and its bell has been preserved at the Neelsville Presbyterian Church, MP site #19/5. The resource includes three outbuildings, which were moved to this site from the pastor's manse which once stood on the opposite side of Walter Johnson Road. These structures have been converted into residences.

This resource was previously on the *Locational Atlas* as part of a proposed Germantown Historic District. A Germantown Historic District including this building was recommended by the HPC in 1984, and the Planning Board in 1988. The County Council designated a historic district in 1989 whose boundaries did not include the Presbyterian Church building.

The zoning for this property was changed in 1989, to OM, an office zone. At that time, a Schematic Development Plan was approved by the County Council that includes the existing building with addition, and two office buildings, as yet unbuilt. The owner has submitted material describing the SDP and alterations made to the building.

The architectural integrity of this resource has been greatly diminished. Historic photographs show that the church was a vernacular Queen Anne building with fish-scale shingle siding, a bell tower, and stained glass windows. The bell tower, a character-defining feature of the church, has been removed. The additions of a wraparound porch and substantial side wing have further obscures what was once a recognizable vernacular church building type. Hence it is no longer representative of a building type. There are occasions when the historic significance may outweigh diminished integrity. Such was the case with Higgins Tavern, which had suffered many changes yet was still found eligible for designation. Staff understands that this resource was a community building, but that may be said of all church buildings, and not all churches are necessarily eligible for designation. This resource does not have the historic significance that would be necessary to outweigh the great loss of integrity that this resource has suffered. Staff finds that the resource does not have the level of architectural or historic significance that would be required for designation as an individual resource.

**WATSON HOUSE (1918), 9206 WATSON ROAD, SILVER SPRING
#36/55, NOMINATION BY CITIZEN GROUP**

The Watson House, located in the Woodside Forest section of Silver Spring, is a Dutch Colonial style residence built in 1918 for the Watson family. The resource has been nominated by the Committee to Save the Watson House as an individual resource under criteria 1a, 1d, and 2a. The owners oppose designation. The Board has received several letters and a petition in support of designation. The petition is signed by 28 individuals. Letters of support include nominators of this resource, the Silver Spring Historical Society, Historic Takoma, a preservation professional, and a local historian. The nominators also submitted additional research material which is included in the Planning Board record. The owner and her representatives, including a preservation consultant, submitted a statement of opposition with supplemental material.

HISTORY

The nominators of the Watson House state that the Watson House gains historic significance from its proximity to other already designated historic sites, the Condict House (#36/34) and the Wilbur House (#36/10). These two historic sites were designated in 2000 when the *North and West Silver Spring Master Plan* was updated. The Wilbur House had been identified on the original *Locational Atlas and Index of Historic Sites*. The Condict House had not been identified on the *Locational Atlas*, but was evaluated and designated in the 2000 Master Plan update. The Condict House (c1852-65) and Wilbur House (c1887) are historically significant for representing the rural estates that characterized Silver Spring in the 19th century. Early 20th century Silver Spring is characterized by suburban development. The Watson House is not representative of a pattern of suburban development. One house does not represent a suburb. The Watsons aimed to establish a suburban community, but their subdivision was not realized. It has not been shown that the Watson family is prominent in Montgomery County history.

The nominators have suggested that there is a potential historic district that is eligible for designation under this Criterion. Staff has not received a historic district nomination. The nomination form received was for the Watson House as an individual resource. If the nominators wish to have a historic district considered, they would need to nominate a historic district and there would need to be a new Amendment to the Master Plan for Historic Preservation, with its own set of public meetings and worksessions.

Staff notes that there are some similarities between the Watson House, which is not being recommended for designation, and the Chase House, which is being recommended. They both date from the early 20th century. They are both like many other houses in suburban Montgomery County built in this time period. They are both built on land that went through a progression from farm to estate of an upper-class Washingtonian to suburban development. Yet there are important distinctions between these two resources.

Unlike the Chase House, the Watson House does not represent the greater community. The residence is in the proximity of two other already-designated historic sites: the Condict House (Grey Rocks) and the Wilbur House. These resources, however, draw their significance from the pre-suburban development era of Silver Spring, while the Watson House does not represent a trend, a community, or have historical connection to the other houses, other than the fact that the Watson family bought the Wilbur House at one point and lived in it before building a new house.

The Watsons had aspirations to be developers, yet they were largely unrealized. A year after establishing a subdivision, James Watson died. The land was largely undeveloped until 1948. Mary Clement Watson platted Watson's Addition to Woodside Park in 1940 and then she died five years later. The Watson House does not represent a larger community or development. The Watsons were not successful developers and did not build a community of buildings. The surrounding community of Woodside Park was developed by others. Staff is not persuaded that the Watson House meets criteria for historic significance.

ARCHITECTURE

The nominator's claim that the resource has architectural significance for representing the Dutch Colonial architectural style. In order to be designated as an individual site under this criterion for architectural significance, the building would truly have to be an outstanding example of its style. In staff's view and based on staff's experience, the Watson House is a good example of Dutch Colonial architecture, but does not rise to the level that staff believes meets the criteria for designation.

In order to be designated as a historic site solely on its architecture, it would need to be of a level that is truly outstanding. The 1918 house is an attractive Dutch Colonial residence, but that is not enough to merit designation as an individual resource.

PLANNING ISSUES

The *North and West Silver Spring Master Plan* was updated in 2000. At that time, a series of public meetings were held and several historic resources were evaluated and subsequently designated. The goal of the preservation program is to plan ahead to identify resource and protect them, whether or not there is a threat, and to integrate the protection of historic resources into the planning process. During this recent master plan update, neither staff nor the community identified the Watson House as a historic resource even when neighboring houses were being designated. There are occasions when a historic resource is otherwise overlooked. Staff does not find that this is such a case.

A point that comes out of much of the testimony and correspondence is that the setting of the Watson House is valuable to the community and sets this house apart from neighboring properties. The resource has a larger than average lot in the Silver Spring area, and it has a wooded, park-like character. In October 2006, the owner submitted a preliminary plan application (120070230) to construct six single-family houses. The 1.43 acre parcel is zoned R-60. The preservation of open space per se does not fall under the realm of the Preservation Ordinance. Should development of this property go forward, staff encourages the owner to consider the value of open space in the community and work with neighbors and the Planning Department to make a plan that could incorporate the existing house and/or allow for some preservation of open space.

Staff finds that the Watson House has neither historical nor architectural significance and does not merit designation on the *Master Plan for Historic Preservation*.

Criteria for Designation on the Master Plan for Historic Preservation

Montgomery County Code, Chapter 24A-3,
of the Historic Preservation Ordinance

The following criteria shall apply when historic resources are evaluated for designation in the
Master Plan for Historic Preservation:

(1) Historical and cultural significance:

The historic resource:

- a. has character, interest, or value as part of the development, heritage or cultural characteristics of the County, State, or Nation;
- b. is the site of a significant historic event;
- c. is identified with a person or a group of persons who influenced society; or
- d. exemplifies the cultural, economic, social, political or historic heritage of the County and its communities; or

(2) Architectural and design significance:

The historic resource:

- a. embodies the distinctive characteristics of a type, period or method of construction;
- b. represents the work of a master;
- c. possesses high artistic values;
- d. represents a significant and distinguishable entity whose components may lack individual distinction;
or
- e. represents an established and familiar visual feature of the neighborhood, community, or County due to its singular physical characteristic or landscape.