



**The Committee of 100 on the Federal City
(Planning Subcommittee)
Comments and Recommendations Concerning**

**Walter Reed Army Medical Center Small Area Plan
Draft for Public Comment—September 14, 2012**

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The Committee of 100 on the Federal City (C100) is pleased to submit comments and recommendations on the Walter Reed Army Medical Center Small Area Plan (WRAMC SAP). For more than eight decades the Committee of 100 has advocated for responsible planning and land use in Washington, D.C. Our work is guided by the values inherited from the L'Enfant Plan (1791-92) and the McMillan Commission (1901-02), while responding to the challenges, needs and opportunities of the 21st century city.

The Walter Reed campus occupies a 110 acre tract bounded by Fern Street and Alaska Avenue to the north, Georgia Avenue to the east, Aspen Street to the south and 16th Street to the west. From its founding in 1909 to its closure in 2011 under the 2005 Base Realignment and Closure (BRAC) recommendations, the Walter Reed campus, as the home of the U.S. Army General Hospital, served the medical needs of U.S. armed forces personnel. Developing as it did, within yet apart from the growing city of Washington, it generally retained a campus-like character, with buildings set in an expansive green landscape. The medical center's closure is a unique opportunity to re-use and reposition this urban campus for future generations.

The Small Area Plan and its predecessor, the Local Redevelopment Authority's Reuse Plan (July, 2012), envisions an activated mixed-use enclave open and accessible to the neighborhood; an environmental showcase and model for sustainable design strategies. The project goals are to 1) integrate the site with the community; 2) provide a mix of uses; 3) create jobs and revenue for DC and 4) activate the site. The Committee of 100 encourages this generalized vision but suggests that flexibility and adaptability of detailed use and program be the touchstone for redevelopment decisions even as the overall program remains fundamentally constant. Put more simply: Rome wasn't built in a day; it is unlikely Walter Reed would be redeveloped in a similar time frame. And the SAP could recognize a strategy recognizing this reality.

As an example, there is discussion, p. 98ff, concerning the reconfiguration of Building 14 and the desirability of a green connection from the Great Lawn to Main Drive and the west side of campus. While Building 14 presently could be seen as a boundary on the west side of the Great Lawn, without benefit of a more developed DOS plan, and further detailed development of LRA Plan, the benefits of a costly splitting and reconfiguration of Building 14 seems premature. What is the green connector connecting? And is it likely that building uses and traffic patterns will warrant it? And while the LRA campus and open space would be enhanced by a network of open spaces and pedestrian connectors,

the pedestrian circulation at the Town Center and proposed buildings J, L and I is a much greater connectivity and wayfinding concern, but is barely discussed in the text. See also C100 comments, below concerning buildings J, L and I.

GENERAL/OVERALL COMMENTS ON THE DRAFT PLAN

Historic Preservation Concerns

The historical importance of the site and designated features should be acknowledged and upheld throughout the redevelopment process. The Committee of 100 has commented on this subject previously and was a consulting party in the 106 process. Nevertheless several points from testimony presented by Loretta Neumann warrant inclusion here:

“First, we want to stress that **this site has great local as well as national historical significance.** It has been part of the cultural life of northwest Washington for over a century. It has been determined eligible for the National Register of Historic Places and was nominated by the DC Preservation League as an historic landmark. Under the programmatic agreement, the Army will request designation of the *entire* installation as an historic district (a designation we support). . .

Second, the **historical significance of WRAMC site is not limited to its function as an Army medical hospital and research facility that opened in 1909. It was also part of a major battle, on July 11-12, 1864, the Battle of Fort Stevens.** This was the only battle of the Civil War that occurred in the nation’s capital. Confederates occupied most of what is now Walter Reed and surrounding areas in DC and Maryland.”¹

Additional testimony went on to stress that the history and significance of the site need to be an integral part of planning and proposed new development of the site.

Comment/Recommendation #1: As a condition of redevelopment, commit to a comprehensive survey and assessment of the cultural landscape and structures, and interpretation as Army medical center, Civil War battlefield and pre-settlement archaeology, as applicable.

Graphic Content of Small Area Plan

The clarity and usefulness of the graphic content and support provided by the various images, maps, diagrams, and views varies throughout the document. There are many examples that could be cited. The following are some:

- There is an extended discussion on pages 48-52 on transportation, including regional and local access, pedestrian, vehicular, transit and service circulation without a single map or plan. This is a serious shortcoming. And page 118 ff. outlines the transportation recommendations of the SAP with minimal graphics and maps. Assessment of both the existing conditions as well as the plans proposals is virtually impossible.
- The topology of the campus, which helped establish building locations and site strategies, is not provided. This would be helpful in understanding the “lay of the land” and the SAP’s response.
- Street/site sections do not consistently show buildings or proposed buildings in relation to the proposed street sections. Again, assessment and commentary is rendered difficult. See e.g. Exh. 4-103, p. 80; Exh. 4-121 and 4-122, p. 89, Exh. 4-157 and 4-158, p. 109 and Exh. 4-

¹ September 27, 2012.

- Potential new construction is shown “ghosted in” only on street views, providing a false sense of the structure’s scale and presence and space created, making a fair assessment of the quality and appropriateness of the space difficult. See e.g. Figs. 4-108 and 4-109, p. 83.

Comment/Recommendation #2: Provide clear, pertinent, developed and necessary visuals and graphic content.

PLAN OBJECTIVE & VISION

Housing Component

It makes no sense for the SAP to propose 90 townhomes and 1864 multifamily units (i.e. over 20 times as many apartments/condos as single family homes) when the Market Study indicates that there’s much stronger demand for -- and development interest in -- single family homes than for multifamily units at this site.

There’s a unique opportunity here to build 3-4 bedroom homes at or below the median price point in this market and to integrate them into stable existing neighborhoods.

The Market Study indicates that “A townhome program of 90-300 units is likely to be most attractive to potential developers.” (p. 5) It suggests that “a critical mass of 125-180 units co-located on site would create a ‘new neighborhood.’” (p. 54) And points out that the robust market for rental houses in this area creates the possibility of diversifying single-family housing by providing rental as well as ownership opportunities. (p. 48) Finally, it notes that new construction will add to the housing mix in an area where most existing homes were built before 1960. (p. 50)

Both the surrounding neighborhoods and the fact that the redeveloped site will include two very popular charter schools suggest that there is an excellent opportunity to create appealing family-sized housing at this site. Conversely, this is a substandard site for multifamily, given its distance from Metrorail stations and the absence of nightlife – as well as the fact that other locales nearby (e.g. Silver Spring, Takoma, Fort Totten) represent more profitable opportunities for developers because the retail and transit mix in those areas mean that apartments command higher rents.

Comment/Recommendation #3: The housing mix should be radically readjusted to prioritize the production of single-family homes on this site. Changes to the Proposed Development Program map and chart on Page 4 should reflect this shift.

Comment/Recommendation #4 : Incorporating land south of Elder Street into the area envisioned for townhomes would break up the proposed “megablocks” between Elder and Dahlia, creating a more pedestrian-friendly neighborhood and opening up the possibility of scaling down the new townhomes along the southern edge of Fern Street and of retaining Building 88 as a community amenity. (See Comment/Recommendation ##s 7 and 9 below.)

Retail, Office, and Other Uses

As the Market Study notes, increased demand for housing in this area will depend on “some unique draw of product types or themed uses.” Basically, one challenge here is to establish the right ecological niche for Walter Reed. And that challenge has two dimensions. First, the proposed niche has to be a realistic and appropriate use of the site and one that lends coherence to its different uses. Secondly, the niche should complement rather than duplicate or compete with niches being carved out for other large scale redevelopment projects. For example, as the Market Study points out, Fort Totten hopes to establish its identity as an arts district. For a variety of reasons, it’s better positioned to achieve that goal than Walter Reed is, so arts uses will probably not

be attracted to (and arguably shouldn't be solicited for) this site. Similarly, a large complex of medical offices are planned for the McMillan site, immediately adjacent to Washington Hospital Center. So despite Walter Reed's history, it's probably not the best location for medical uses. Saint Elizabeth's is the likely location for a tech incubator.

So what can or should be Walter Reed's unique contribution to the District?

Given that the first non-residential uses of the campus will include embassies on the DOS side and bilingual charter schools on the DC side, one possible theme for the area would be an affordable family-friendly multicultural and multiracial enclave within the city.

The Market Study indicated that a small grocery store would be the most attractive retail use from the standpoint of generating residential demand, but price competition from the incoming Walmart (less than a mile from the site) argues for either a specialty store like Trader Joe's or an international chain like Lotte or Super H (both of which have stores in the suburbs but haven't established any locations in the District). All three stores offer both low prices and a diverse and interesting selection of foods. And all three would have the potential to be both neighborhood-serving and to function as destination retail. (A more homegrown alternative might be Rodman's, though they don't seem to be in expansion mode.) Daiso (a Japanese dollar store) is moving into the US market and might be a complementary use to a grocery store.

Another way to build the international character of the site would be to consider repurposing Building 1 as an IB high school and/or middle school. If Walter Reed became a place where families had access to multicultural education from preschool through high school, that could be a powerful attractor and a defining feature of the neighborhood.

Comment/Recommendation #5: Formulate a unique program/identity for this redevelopment effort and prioritize adding components that establish that identity – especially retail -- early on. Aim for coherence and place-making rather than ticking off a list of unrelated planning goals.

Comment/Recommendation #6: Reconsider "big box" retail as an appropriate anchor for Walter Reed's "Town Center." There are better ways to do destination retail on a scale and of a character that would be neighborhood-reinforcing. With a new Walmart just a mile south, there will be little or no benefit to the communities along Georgia Avenue from adding another big box store at Walter Reed.

SITE WIDE URBAN DESIGN PRINCIPLES AND REDEVELOPMENT FRAMEWORK RECOMMENDATIONS

Fern and Elder Street Neighborhoods

The extension of 12th and 13th Streets south of Fern Street into the site extend the city grid and if such connectors are given sufficient width and plantings can suggest entry into the former Walter Reed site, now more directly connected with the existing townhouses and single family dwellings on the north side of Fern Street.

Comment/Recommendation #7: Consider limiting the height of new development on Fern Street to transition to the existing structures on the north side of Fern per the Advisory Neighborhood Commission 4B resolution on Walter Reed.²

Comment/Recommendation #8: Design the 12th and 13th Street connectors to recall the boundary of WRAMC and the Walter Reed campus.

² ANC 4B Resolution 12-1004, October 22, 2012

Building 88

Given the program of this building at the time of base closure (natatorium, gymnasium and child care center) and its smaller scaled character, it seems that this building could be incorporated into the residential neighborhood redevelopment of the project.

Comment/Recommendation #9: Consider redevelopment of Building 88 as a neighborhood center, retaining its recreational and community based program elements.

13th Street Promenade

The 13th Street Promenade has the potential to be an elegant and stately approach to the historic north façade of Building 1. Whether the length of the Promenade should be two-thirds of the block between Elder and Dahlia Streets—as currently shown—or the entire block length is a design element requiring further study. A full length promenade would give the townhouse development at the north more “breathing room” between it and the commercial buildings, recollect the campus-like character of the original Walter Reed campus and provide a more stately approach to the Building 1/Building M/Building N grouping.

Comment/Recommendation #10: Consider expanding the 13th Street Promenade so that it encompasses the entire block between Elder and Dahlia Streets.

Buildings J, L, I

Although designated by three letters, this building is rendered as, and clearly designed to be understood as one large—indeed megablock—building. While it is not unreasonable to put density and height away from the perimeter of the site, does it make sense to build up and place maximum density—residential and—adjacent to Building 1, the most historic structure on the campus and of a vastly different scale? Pedestrian and user circulation around and through this complex is recognized within the text as a problem, p. 88. The solution of mid-block crossings or arcades is not sufficiently developed to comment on at this time.

The proposed building, in its footprint, in its bulk, in its resistance to integration with Georgia Avenue or any of its neighboring buildings and in its inward oriented (and presumably private) courtyard fails to meet the plan’s goals of integrating the site with the community and activating the site. Having erased Building 2 from the site plan, the designers have put a simulacrum back in.

Comment/Recommendation #11: Reconsider the central block and associated buildings J, L and I in the overall development plan.

Georgia Avenue

In the SAP the Georgia Avenue frontage is characterized as redevelopment “. . . with a mix of uses and building types while keeping an abundance of open space” (p. 8). The plan, however, shows the street front will be largely built-up with multi story buildings and no green space in addition besides the two “green breathers” which having existing healthy mature trees, are appropriately and wisely retained.

The proposed buildings toward the mid point-point of the site (Q, R, S), and proposed buildings at the corner of Georgia and Aspen (U and V) are of a very different scale than the existing retained buildings (6, 7, 8, 9, 12), several of which are contributing historic structures. The campus-like character of WRAMC fronting Georgia Avenue will be compromised under the proposed plan. Notably, the primary visual cues that one historically had approaching Walter Reed from either the north or the south along Georgia Avenue—the openness of the site itself—will be lost with the construction of buildings U and V (south end at Aspen) and G (north end at Fern).

Comment/Recommendation #12: Consider strategies to retain and integrate the open space character of the historic campus along the redeveloped Georgia Avenue frontage. Particular attention should be paid to the views and the proportion of open space to building footprint and mass at the northeast (Fern Street) and southeast (Aspen Street) intersections.

Comment/Recommendation #13: Designate a PROS (Parks, Recreation and Open Space) mixed use designation along the entirety of Georgia Avenue to ensure that open space will be retained and appropriately integrated with commercial development.³

TRANSPORTATION RECOMMENDATIONS

Pedestrian

As the SAP implicitly acknowledges with respect to distance from the Walter Reed campus to the Takoma Park Metrorail station, the radius approach to walking distances and times is misleading at this site.

Comment/Recommendation #14: In all discussions of walkability and pedestrian travel time identify existing or proposed paths or routes and provide actual walk times. Circles drawn on maps without any indication of topography or of pedestrian access are misleading, especially in a site with large buildings, vast green spaces, and few sidewalks.

Comment/Recommendation #15: Assess the safety, visibility, and pedestrian-friendliness of designated paths within the site and from the site to transit and other facilities both day and night.

Biking

A government-owned site of this scale, where the road system is, of necessity, going to be re-engineered in the course of redevelopment, presents a rare opportunity for creating dedicated bike lanes (on street) or paths (off street). Dedicated rights-of-way are safer for both cyclists and pedestrians (especially in an area where programming provides facilities for children, seniors, and people with disabilities).

Bike routes should be designed to connect elements within the site as well as to provide convenient and inviting links between the site, surrounding areas, and established bike routes citywide. Exhibit 4-177 “Bicycle Recommendations with proposed plan” seems more oriented toward moving cyclists through the campus than in facilitating travel within the campus and it fails to propose connections between on-site bicycle routes and existing routes to the north and east of the campus.

Comment/Recommendation #16: Establish design guidelines and a policy preference for dedicated bike lanes on this site. Require the Master Developer to separate pedestrians and bikes whenever possible, as well as to separate bikes from cars. As with pedestrians, ensure that routes designated for cyclists are designed for safety both night and day.

Comment/Recommendation #17: Rethink and revise the Bicycle Recommendations map to establish better connectivity within the site and better connections to existing paths external to the site. For example, it should be safe and easy for older children to bike from the proposed townhomes at the north end of the site to a school at the southwest corner of the site.

Streetcar

Successful transit planning will depend upon developing a maintenance facilities master plan for the entire streetcar system. Siting of maintenance facilities should not be done opportunistically. If we want a viable streetcar system, we need to locate maintenance facilities where they are needed most and/or where they can best service multiple lines. Unless and until we know which lines will be built and where, it doesn’t make sense to dictate the location of maintenance facilities.

Comment/Recommendation #18: Remove the language in Table 5-179 (Implementation Table) that says “Require Streetcar Vehicle Maintenance Facility on-site, should a final Streetcar route be determined for Georgia and/or internal to the Site.”

³ Similar arguments and recommendations can be made about the 16th Street and Aspen Street intersection. The preservation or appropriate—and generally modest—development of the corners is critical.

Bus and Metrorail:

Do not wait for a streetcar to develop convenient and reliable connections between this site and Metrorail stations. The long-term success of redevelopment efforts at Walter Reed may depend on establishing the transit-accessibility of the site at as early a stage as possible. The viability of both residential and retail development on a significant scale will be a function of how well this site is connected to attractions nearby (Silver Spring, Takoma Park) and to the city as a whole via public transit.

In addition to existing bus service, WMATA has proposed rerouting the 54 (14th Street line) to provide east-west service within the Walter Reed campus, as well as connections to the Columbia Heights and Takoma Metrorail stations, as well as downtown.

WMATA and DDOT also plan to create a two-way “Neighborhood Circulator” that would connect Silver Spring, Walter Reed, and Takoma Park, as well as provide north-south service within Walter Reed. WMATA anticipates providing service every 15 minutes for both routes. No timeframe has been set for implementation of either route because both are seen as contingent on development plans and progress at this site.

Comment/Recommendation #19: Replace the recommendation “Determine Shuttle Service options between the site and the Takoma Metrorail station” in the Implementation Table (Exhibit 5-179, page 133) with the following: “Reroute the 54 bus line and establish Neighborhood Connector service (as mapped in Figures 4-5 and 4-8 of the Metrobus 14th Street Line Study) to coincide with the development of new residences at the Walter Reed campus.”⁴

PLANNING PROCESS

Thus far, this Small Area Plan is a design based on wishlists and formulas rather than on place-making and circulation. Every “good thing” the District wants gets a mention and every category of use gets a zone, but the whole is still less than the sum of the parts. What’s lacking is coherence, realism, and a strategy to get from where we are now to where we want to be.

A redeveloped Walter Reed could either be a real asset to the city or a random jumble of institutional uses, new housing, historic buildings, big box retail, and green spaces that both literally and figuratively don’t address each other.

Comment/Recommendation #20: While there are many compelling components in the development scheme, there remain many unanswered questions and unresolved elements. The Committee of 100 recommends additional study, refinement, and clarification prior to Council action on the Walter Reed Army Medical Center Small Area Plan. Specifically, the plan should present a coherent and integrated vision for the redeveloped site. The plan should be realistic (i.e. consistent with the Market Analysis) and should be staged in such a way that development at each phase of the project succeeds on its own terms and lays the groundwork for the next phase.

Ultimately, the goal is to create a great place to live, work, learn, and play and a place that strengthens and contributes to the neighborhoods that surround it.

Thank you for the opportunity to comment. The Committee of 100 looks forward to seeing and participating in the plan’s future development.

⁴ WMATA and DDOT, Metrobus 14th Street Line Study (Routes 52, 53, 54) Final Report, October 2012, pp. 2, 29 (Figure 4-5), and 38 (Figure 4-8).

Available at http://www.metrobus-studies.com/52-53-54/14th%20Street%20Line%20Study_Final%20Summary%20Report_10192012.pdf