



Comments of the Committee of 100 on the Federal City on  
FOREIGN MISSIONS CENTER AT THE FORMER WALTER REED  
ARMY MEDICAL CENTER

Draft Environmental Impact Statement  
U.S. Department of State January, 2014

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The Committee of 100 on the Federal City (Committee) is pleased to offer comments on the Draft Environmental Impact Statement (DEIS) for the proposed Foreign Missions Center (FMC) at the former Walter Reed Army Medical Center (WRAMC). 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 21<sup>st</sup> century city.

The Committee of 100 has participated in the redevelopment proposals for the WRAMC, including the Section 106 process, the city's Small Area Plan and, most recently (June, 2013) in commenting on the Department of State's Foreign Missions Center Plan and its effects on historic properties.<sup>1</sup> The Committee is currently participating in Section 106 consultations on the DOS FMC site.

Our general comments address the primacy of the diplomatic function on this unique site; in addition, we will comment on the aspects of the Proposed Action.

**THE DIPLOMATIC FUNCTION**

The diplomatic function in the nation's capital occupies a unique and privileged position within the planning efforts for the city. The symbolic as well as the physical location for an embassy, a chancery or foreign mission IS important, and the choice is not just about maximizing the number of buildable lots. But the Department of State (DOS) criteria for success is cost-effectiveness which "... include[s] maximizing the number of lots available for assignment, ... and minimizing maintenance-intensive public features".<sup>2</sup> The DEIS further identifies "Alternative 1. . . as the Preferred Action Alternative because it furthers the purpose of the project and satisfies the needs for the project while best maintaining and enhancing the existing character of the former WRAMC. . . and maximizing marketability by allowing the greatest flexibility in developing the site."<sup>3</sup>

<sup>1</sup> C100 comments on Foreign Missions and International Organizations Element, July 5, 2013.

<sup>2</sup> DEIS, p. iii.

<sup>3</sup> DEIS, p. v.

While the NEPA process, by law, requires consideration of a “no-build” alternative, its function is not simply to decide whether a project is necessary or unnecessary. It is to determine, after analyzing a variety of realistic alternatives, the best way to solve specific problems and/or to meet specific needs.<sup>4</sup> Or as the DEIS acknowledges:

The NEPA process is intended to help public officials make decisions based on an understanding of the environmental consequences and to take actions that **protect, restore, and enhance** the environment (40 Code of Federal Regulations (CFR) Part 1500.1) [emphasis added]<sup>5</sup>

Although the Committee of 100 is sympathetic to the inherent tension in creating a diplomatic enclave—being open to the transaction of diplomatic affairs, engaging with the surrounding retail community and street life, and being respectful of adjacent residential use and scale—while also providing a sufficiently secure and decorous environment for the diplomatic community, the Committee is seriously concerned that the apparent strategy of DOS is to create a blank slate for foreign mission development opportunities at Walter Reed. The Committee’s concern is heightened since DOS considers the International Chancery Center (ICC) at Van Ness as a success:

The ICC has proven to be a highly successful model for balancing the federal government’s need to accommodate foreign mission facilities with the concerns of citizens about the location and operation of foreign missions in the District of Columbia.<sup>6</sup>

At the ICC, however, a multi-acre campus that was the former home of the Bureau of Standards, a remarkable collection of buildings significant in the history of groundbreaking science and technology research was razed to make way for the ICC campus and Intelsat headquarters. As has been noted in the Streets of Washington website:

Astonishingly, none of the Bureau's historic buildings were preserved. . . The Secretary of Commerce, required under Section 106 of the National Historic Preservation Act to assess the historic value of the NBS structures, **determined that not a single one of the 90 structures on the 70-acre campus had any historic significance at all, an outrageous assertion that would be inconceivable today.** [emphasis added]<sup>7</sup>

The Committee is already on record about the lessons to be learned from the ICC site:

The existing International Center at Van Ness was, in effect, a first attempt at this kind of international center. It seems desirable to make some design and environmental

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<sup>4</sup> The Purpose and Need Section of an EIS is one of the most important and should therefore be clear and well documented. The purpose and need drives the development of the range of alternatives. Some of the common needs include transportation demand, safety, legislative direction, urban transportation plan consistency, modal interrelationships, system linkage, and the condition of an existing facility.

The "no-build" alternative is always included as a benchmark against which the impacts of other alternatives can be compared. As part of the no-build alternative, short-term minor reconstruction, such as safety upgrading and maintenance, can be considered. In addition, Transportation System Management must also be included as an alternative and can include high-occupancy vehicle lanes, ridesharing, signal synchronization, and other actions. Where appropriate, mass transit options should also be considered.

<http://www.environment.fhwa.dot.gov/projdev/docueis.asp>

<sup>5</sup> DEIS, p. 11ff.

<sup>6</sup> DEIS, p. 10.

<sup>7</sup> <http://www.streetsofashington.com/2013/07/the-lost-hilltop-home-of-national.html>

improvements at the Walter Reed site. These would include creating an overall sense of place, relating to the future private and public development on the eastern portion of the site, encouraging porosity between the commercial development and the diplomatic functions insofar as possible, and maintaining an attractive border around the site (especially on views from 16<sup>th</sup> Street, Alaska Avenue and Fern Street, NW). The Chancery Complex should generally be open to the public (except for security arrangements) and designed so that the overall landscape of the site can be seen and appreciated. The historical building and landscape features of the Walter Reed campus need to be respected.<sup>8</sup>

DOS has set itself a low bar in the proposed reuse of the site even though so much is available: varied and dramatic topography, a desirable and preeminent location on 16<sup>th</sup> Street, a historic urban campus setting, a mature landscape with many fine trees and vegetation and proximity to Rock Creek Park. But to DOS it is largely a piece of dirt:

FMs would fully fund DOS's upfront infrastructure development costs through the revenue generated from the assignment of lots. Cost effectiveness measures for the FMC include *maximizing the number of lots* available for assignment, *re-using existing roadway locations* and *minimizing maintenance-intensive public features*. [emphasis added]<sup>9</sup>

The cost-neutral financial plan for funding this undertaking is creative. However, it is important that DOS factor in the possibility of glitches which may pressure them to become more interested in their financial return on investment in the short run than their cultural return on investment in the longer term.

DOS is basing planning and development decisions on maximizing the number of lots (i.e. maximizing income to expenses); reusing historic infrastructure when convenient (i.e. roads) and not reusing historic resources (i.e. buildings) when not convenient; and minimizing public features. Are these really the criteria for the establishment of a Foreign Mission Center? We think not. The implemented concept of the ICC at Van Ness should not be the model of the FMC at Walter Reed.

NCPC clearly and correctly states the most desirable criteria for establishing a Foreign Mission Center:

It is the goal of the federal government to plan a secure and welcoming environment for the location of diplomatic and international activities in Washington, D.C. in a manner that is appropriate to the status and dignity of these activities, while enhancing Washington's role as one of the great capitals of the world. . . . The [Foreign Mission] element . . . includes policies to ensure that foreign missions acknowledge the **prestigious nature of the diplomatic mission, contribute to the beauty of the city, and reinforce the unique characteristics of Washington's neighborhoods**. [emphasis added]<sup>10</sup>

The Committee of 100 contends that the nature of the diplomatic function of the host nation in the capital city is not exclusively a function of the bottom line, while acknowledging that fiscal responsibility, planning and oversight fiscal management must be rigorous and realistic and are at

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<sup>8</sup> C100 comments on Foreign Missions and International Organizations Element, July 5, 2013.

<sup>9</sup> DEIS, p. 5. The maximization of lots is recurrent throughout the DEIS. See e.g. p. 30.

<sup>10</sup> Comprehensive Plan for the National Capital: Federal Elements, p. 59.

the core of the NEPA process to protect, preserve, and enhance the environment (40 Code of Federal Regulations (CFR) Part 1500.1).

### **PURPOSE AND NEED**

The Committee of 100 also acknowledges the need for the expansion of foreign mission building options in the District of Columbia<sup>11</sup> and recognizes the potential in the establishment of a new FMC at Walter Reed as a historic opportunity to advance the goals of DOS leveraging the position of the U.S. to build or expand in foreign countries, facilitating growth in the U.S. economy, providing desirable chancery locations in the District, and generating economic development.<sup>12</sup>

In addition to these announced DOS goals, the National Capital Planning Commission (NCPC) recommends criteria for the development of future chancery/foreign mission growth. Among the criteria for these areas, which should be addressed in the DEIS, are:

- Land use designations are compatible with foreign mission development;
- Availability of adequate land areas for a variety of mission sizes;
- Potential and/or adjacency of redevelopment and reuse opportunities;
- Prominent sites that can accommodate the diplomatic mission;
- Ability to meet the planning objectives of federal and D.C. governments;
- Accessibility to multiple modes of transportation;
- Promotion of historic preservation and adaptive reuse strategies;
- Strengthening the character and image of the national capital.<sup>13</sup>

The proposed development of the FMC at the Walter Reed site is in alignment with several policy elements of the DC Comprehensive Plan. See, e.g. 316.7 (locate in mixed-use areas); 316.8 (support neighborhood revitalization east of 16th St); 316.12 (use federal land). In particular see 316.9 (compatibility of new chanceries) which promotes “ . . . the design of chanceries in a manner **that protects the city’s open space and historic resources**, mitigates impacts on nearby properties, is compatible with the scale and character of its surroundings, and **enhances Washington’s international image as a city of great architecture and urban design** [emphasis added].

The location of the FMC at Walter Reed is historically appropriate as one of the earlier diplomatic enclaves in Washington was located in Meridian Hill neighborhood on 16<sup>th</sup> Street.<sup>14</sup> Subsequent development led to a concentration of embassy buildings in the Dupont Circle, Kalorama and Massachusetts Avenue neighborhoods. In the latter part of the 20<sup>th</sup> century the ICC at Van Ness was developed to meet growing and changing diplomatic mission needs. Developing a twenty-first century FMC at Walter Reed in light of the BRAC closure, is an appropriate repurposing of the property on the historic and prestigious 16<sup>th</sup> Street corridor.

### **CRITIQUE OF PROPOSED ACTION**

Notwithstanding the multiple benefits in developing the 16<sup>th</sup> Street site as an embassy compound, there are criticisms of the DEIS. Our position does not deny the potential benefits of developing the WR site per se, and does not recommend a particular build alternative, but rather examines some of the consequences. Indeed, on examination, several of the rejected alternatives are

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<sup>11</sup> C100 comments on proposed revisions to the Foreign Missions and International Organizations Element, submitted to NCPC July 5, 2013. See in particular comments on the WRAMC site: “Located on 16<sup>th</sup> Street, one of the most important streets in Washington, with visual and symbolic connection to the White House and the historic embassy district centered on Meridian Hill, the choice of the Walter Reed campus, seems particularly appropriate for the development of a new international center.”

<sup>12</sup> DEIS, p. 1.

<sup>13</sup> Comprehensive Plan for the National Capital: Federal Elements, p. 68.

<sup>14</sup> Comprehensive Plan for the National Capital: Federal Elements, p. 63.

superior to the preferred alternative in site organization, providing public space and managing the topographic elevations changes of this hilly site.

The DEIS enumerates six benefits or reasons to undertake the Proposed Action.<sup>15</sup> We propose to examine several of them.

1. Designing each lot access point to be placed on internal roadways of the campus

This element really deals with two core issues: number and distribution of lots and the way vehicles and people move through the site. DOS is to be commended for funding infrastructure costs through revenue from assignment of lots and the implementation of full build out in phases. Indeed, in an era of governmental fiscal responsibility and the prospect of building out 43 acres of property, such an approach is probably the only feasible one. But DOS has provided no backup documentation, no justification for proposing the number of lots on the property, or any financial analysis that demonstrates that infrastructure well into the future can reasonably be funded through projected income. Could there be fewer lots? Should there be fewer lots?

- *Supporting material justifying the number of lots and financial analysis of the proposed incremental improvements would help in evaluating the proposed action.*

We also find lacking a sufficiently detailed narrative and site diagram of the multiple levels on which diplomatic facilities operate in terms of entry into the diplomatic compound, site circulation and arrival at the mission building. These levels may include ceremonial arrivals for domestic and foreign officials and heads of state; the daily business functions of an embassy, including visa processing and cultural and commercial delegations; arrival and departure of the mission staff; and the many service functions, including catering and waste management, that are part of the of the routine activities of the mission compound. The proposed plan does not present, even at a conceptual level, sufficient information that shows proposed roads, lot designations and service functions that are appropriate for a diplomatic enclave.

- *Supporting material illustrating this level of use on site relative to the layout of the Preferred Alternative would be helpful in evaluating the proposed action.*

2. Allowing public access to the public areas within the site

This portion of the Proposed Action needs clarification. This statement indicates that the public will be admitted to the particular areas the public will be admitted to, which could be all of the site, none of it, or a portion thereof. DOS intentions are not clear. What conditions or restrictions placed on access to the public areas?

- *Please clarify statement.*

3. Developing a re-use program for one historic building and maximizing the potential for re-use of other historic buildings

We understand that the Army's research and recommendation for listing in the National Register was not available at the time of the publication of the DEIS.<sup>16</sup>

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<sup>15</sup> DEIS, p. 2.

<sup>16</sup> Section 106 consulting parties meeting on Feb. 26, 2014, attended by C100 members Faith Wheeler and Loretta Neumann, who also represented the Alliance to Preserve the Civil War Defenses of Washington.

- *We hope that this work will soon be made available for public comment before proceeding further with the EIS process.*

The re-use of the chapel and DOS commitment to landscape preservation in the triangular parcel on Alaska Avenue is laudable. We understand that the Army will retain control of the chapel and grounds and we look forward to reviewing the details of the negotiated agreement when it is made public.

While the Committee of 100 is aware of the diplomatic challenges in foreign missions selecting sites for their chanceries, the Committee of 100 is, nonetheless, alarmed and disappointed that DOS has committed to retain only one of the historic buildings on the campus: the chapel, Building 57. Considering that the historic buildings on the DOS portion of the campus are an important factor in making the entire 110 acres eligible for listing on the National Register for Historic Properties (NRHP), the Committee of 100 urges DOS to develop attractive financial packages which will encourage interested embassies to select and restore other historic buildings, too, on the 43.5 acres that DOS is seeking to obtain. If DOS demolishes all of these historic buildings, the site could well be de-listed from the National Register because it will have lost integrity through loss of a significant number of the district's resources. With a firm commitment to retaining one building only, DOS seems to have made judgments on these buildings "without testing or asking". This is not thoughtful or respectful planning on a historic campus.<sup>17</sup>

Other buildings on the site are potentially re-usable. These include Buildings 40 (former WR Army Institute of Research), 41 (former Red Cross building), 52 (former hospital Ward building) and the eight bungalows and 4-squares (at the intersection of Georgia and Alaska Avenues). Suggestions have been made for reuse or for relocating them.

- *We recommend that these buildings be retained until potential re-use is studied further.*

The challenges inherent in the former uses of structures and the apparent difficulties of adaptively reusing these structures do not release DOS and their clients—foreign delegations—reusing the existing structures, nor does it absolve DOS of mitigation.

- *We recommend further consultation with HPO and the preservation community to implement a strong and truly comprehensive plan for the re-use of identified historic resources on the campus, and that the reuse of Buildings 40, 41 and 52 be identified as a baseline for the FMC.*
- *We urge DOS to include information in the EIS about the role of the grounds in the Battle of Fort Stevens, and to work with the District development team in collaboratively interpreting the Battle of Fort Stevens.*
- *We ask DOS to take responsibility for noting historic buildings, events, archaeological finds, etc. with appropriate markers explaining their historic significance; also that DOS coordinate the design of such markers with the DC entity charged with creating historic markers on the DC portion of the Walter Reed campus.*

## 5. Emphasizing vehicular and pedestrian connections between the DOS portion and the adjacent land uses

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<sup>17</sup> Both the federal and the District elements of the Comprehensive Plan recognize that foreign mission functions can—and have—been housed in a variety of building types and sizes: "Foreign missions occupy buildings of all sizes, shape, and ages. Some are housed in former residential row houses or mansions, while many are in custom-designed buildings. Others lease space in commercial office buildings. . . . Collectively and individually, these buildings contribute to the vibrancy and diversity of Washington's neighborhoods and add significantly to the visual interest and character of the city." *Comprehensive Plan for the National Capital: Federal Elements*, p. 60. See also Section 316.1 of the District Elements of the Comprehensive Plan.

The 16<sup>th</sup> Street location is a challenging but also very promising site. We have seen that creating a “blank slate” for development is neither appropriate nor consistent with federal and District planning objectives. But NCPC policy to “. . .site chanceries so that they add visual interest and character, contribute to cultural life, and promote diverse and lively communities” and development plans for the eastern portion of the Walter Reed campus fronting on Georgia Avenue will actually help ensure the realization of this goal.<sup>18</sup>

There can be a balance between the diplomatic function and the “diverse and lively community” that already exists in the Georgia Avenue corridor and that the District hopes to augment with new, mixed use development. It is not a zero-sum game, but rather one in which local, federal and foreign governments can benefit and win.

External transportation and internal mobility are important aspects of planning a tract of land. The argument may be made that much like the ICC before it the “. . .Walter Reed site is too far removed from downtown Washington to be convenient. (There is no Metro access to the site, unlike the center at Van Ness.) Additionally, the creation of these enclaves shuts off chanceries from the general public — a similar complaint that has been made about new, fortress-like U.S. embassies abroad.”<sup>19</sup> In order to promote sound transportation planning for the success of the Walter Reed build-out the Committee of 100 recommends:

- *Careful consideration of multiple modes of transportation and collaboration between District and federal government agencies, as well as Maryland authorities and all other relevant organizations, such as WMATA, in developing transportation options;*
  - *Appropriate public transportation connections to population concentrations and transportation hubs in both the District and nearby Maryland suburbs, such as Silver Spring.*
  - *Provision for a safe and walkable neighborhood through design of the streets and walkways.*
4. Maintaining a 30-foot setback between the southern boundary of the site and historic Main Drive and
6. Maintaining a 50-foot vegetated buffer on the west boundary of the site, and preserving the tree canopy to the maximum extent possible

Both of these proposed setbacks begin to address the relationship of buildings to street and the preservation of the landscape. DOS efforts are commended and we encourage DOS to go farther in the area of environmental stewardship. To retain and enhance the value of the natural environment, the Committee of 100 encourages DOS to:

- *Save and protect mature and/or valued and rare specimens of trees and other plants on their site, including rhododendrons and azaleas;*
- *Consider “daylighting” any underground streams which may be discovered in the course of the construction; and*
- *Minimize noise, inconvenience and hazardous materials during the construction as well as the operation of the chanceries.*

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<sup>18</sup> Comprehensive Plan for the National Capital: Federal Elements, p. 66.

<sup>19</sup> Martin Austerhuhle “State Department Eyes Walter Reed To Be D.C.’s Next Embassy Enclave”

[http://www.washdiplomat.com/index.php?option=com\\_content&view=article&id=8547:state-department-eyes-walter-reed-to-be-dcs-next-embassy-enclave&catid=1492:september-2012&Itemid=504](http://www.washdiplomat.com/index.php?option=com_content&view=article&id=8547:state-department-eyes-walter-reed-to-be-dcs-next-embassy-enclave&catid=1492:september-2012&Itemid=504)

The Committee of 100 appreciates the enormity and complexities of the task of developing this property and looks forward to future opportunities to provide comments.

Sincerely,

Nancy MacWood,  
Chair

March 31, 2014

In replying, please respond to

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