The Committee of 100 on the Federal City



Founded 1923

October 22, 2014

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Public Buildings Service

Office of Planning and Design Quality Attention: Nia Francis, Project Manager

301 7th Street, SW, Room 4004

Washington, DC 20407

SUBJECT: NEPA Scoping Comment

Dear Ms. Francis:

This letter responds to the General Service Administration's request for scoping comments on the proposed Environmental Impact Statement and the Section 106 review under the Historic Preservation Act regarding the acquisition of a consolidated FBI Headquarters at a new location and the exchange of the existing J. Edgar Hoover-FBI Headquarters Building (JEH-FBI) parcel. Our principal concerns are with regard to the future of the JEH-FBI site and how future redevelopment of that site can enhance the vitality of Pennsylvania Avenue.

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. The Committee of 100 has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning and design work of the McMillan Commission (1901-02). Both of these plans have been important in shaping the "Monumental Core" of Washington, D.C. Pennsylvania Avenue between the Capitol and the White House is a key element of the L'Enfant Plan and the Monumental Core and adjacent areas.

The proposed exchange of the JEH-FBI site is not just the transfer of any piece of valuable property in downtown Washington, DC. It is a large site with a block long frontage on arguably the most important street in the United States. Sometimes called the "Main Street of America", it is the place of Presidential Inaugural Parades and many other national and local events. It was also recently

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designated by the American Planning Association as one of the great places in America. Pennsylvania Avenue is truly a national street recognized across the nation and around the world.

In addition to its historic and ceremonial role, Pennsylvania Avenue has long been seen as a "bridge" between Downtown to the north and the Federal Triangle and National Mall to the south. This role is even more important now and in the future in view of the continued revitalization of Downtown and new attractions and improvement on the National Mall and nearby. Redevelopment of the FBI building site, with good design and an appropriate mix of uses, is a key step in achieving a more active Pennsylvania Avenue in the future.

Obviously, redevelopment is some years into the future. However, it is important not to limit the future redevelopment of the JEH-FBI site by short-sighted and limited decisions that focus more on a new FBI campus and less on the future of the current headquarters site. Accordingly, EIS alternatives and any redevelopment stipulations must include the ability to respond to changes and new plans such as the Pennsylvania Avenue Initiative recently begun by the National Capital Planning Commission, the General Services Administration and the National Park Service. Nevertheless, all of the proposed alternatives and stipulations on the transfer of the JEH-FBI site to a developer should be formulated to enhance the future of the avenue and be consistent with the Pennsylvania Avenue Initiative.

This cannot be simply an attempt to maximize the financial return to the Federal government. The Federal government has been involved in revitalizing Pennsylvania Avenue for over fifty years; GSA as a Federal agency has a responsibility to ensure that the future use of the JEH-FBI Headquarters site meets the highest standards for design and uses as befitting the most significant street in this country. This opportunity should not be wasted.

We look forward to engaging in future public consultation opportunities, commenting on the draft environmental impact statement, and participating in the Section 106 review process.

Sincerely,

Nancy MacWood

Chair