

COMMITTEE OF 100 ON THE FEDERAL CITY

MEMORANDUM

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FROM: Richard Houghton

SUBJECT: AFRH Draft Preservation Plan

DATE: January 12, 2007

As a supplement to Committee of 100 (C100) comments submitted November 20, 2006 and in response to the Section 106 consultation meeting December 11, 2006 the Committee of 100 submits the following additional comments on the Armed Forces Retirement Home-Washington (AFRH-W) Draft Preservation Plan of October, 2006.

I. SUMMARY OF RECOMMENDATIONS

The Committee of 100 reaffirms its recommendations of our November 20, 2006 memorandum, as herein modified:

- Develop the "Farm in the City: 1881-1906" section of Chapter 3 to reflect the McMillan Commission era history of the Home and the significance of the Home in the overall park framework of the Commission's plan for Washington, DC.
- Complete and submit a nomination to the National Register of Historic Places for the Soldiers' Home historic district as agreed to by AFRH-W as part of 1988 Section 106 consultations. Complete and submit a nomination to the National Register listing for a cultural historic designed landscape as recommended in the preservation plan.
- Appoint a Cultural Resources Manager as recommended in the preservation plan. *As part of the job description include requirements for professional training in historic preservation or a related field and an appropriate number of years and level of experience in the field of historic preservation or a related field.*

- Establish preservation planning principles for the master planning process and new construction guidelines, *as modified and clarified in comments below, section II.*
- Provide a matrix, compilation or schedule outlining the preservation review process by the National Capital Planning Commission (NCPC), Commission of Fine Arts (CFA) and the National Park Service (NPS) and/or other Federal agencies for proposed actions (existing structures or new construction).
- Ensure consistency with both the Federal and District Elements of the Comprehensive Plan for the District of Columbia, *as modified and clarified in comments below, Section III.*

II. PRESERVATION PLAN/MASTER PLAN RELATIONSHIP

In our November 20 memorandum, The Committee of 100 commented on the poorly defined relationship between the preservation plan and the master planning process. The GSA consultant team spoke to this topic at the December 11 meeting, dissociating the preservation plan and the preservation plan process under Section 110 from the master plan and the Section 106 review process. Discussion followed and there was clarification of the proposed arrangement of the master plan, programmatic agreement and preservation plan, as well as the timing and “coming together” of these documents. The Committee of 100 looks forward to reviewing text in the revised preservation plan that results from and further clarifies these discussions.

Nonetheless, concerns about the relationship between the preservation plan and the master plan persist, if for no other reason than the fact that the preservation plan makes reference to the as yet unapproved master plan. The references to the master plan (both in text and in maps/diagrams, see e.g. p. 162 ff.), are in some instances quite detailed and specific (e.g. spacing of street trees and design of fencing), but do not address large issues such as the historic landscape, view sheds, landforms, and substantive land use and development issues on AFRH-W property. The references to but incomplete treatment of the master plan and superficial treatment of new construction issues found on page 162 is likewise troubling. The preservation plan is introducing some issues relevant to the master plan, but not fully engaging the issues of a sustained examination of preservation *vis a vis* master planning.

In short, the preservation plan appears to be cutting the preservation plan/master plan issue inconsistently. Is the preservation plan a preservation **master** plan? Seemingly yes, insofar as it is a “document to guide AFRH in the preservation and maintenance of its historic assets. . .”¹ but not insofar as it informs a concurrent master planning process which proposes to add several million square feet of development on the campus.

¹ E-mail of December 12, 2006 from Tim Sheckler to AFRH Section 106 Committee.

Tim Dennee's recent observations (December 20, 2006) to the GSA on the on-going St. Elizabeths-West Campus are extremely timely in the AFRH-W review process. Mr. Dennee's observations about the relationships established between the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) and both NEPA and NHPA relative to an integrated, first class planning exercise suggests a standard of care and excellence we believe appropriate to the AFRH-W campus.

Clarification of this multi-faceted and paramount issue in front of the consulting parties would be appreciated. As noted above, we look forward to the revised preservation plan as the next installment of this discussion.

III. COMPREHENSIVE PLAN

The Committee of 100 has previously (November 20 memorandum) requested additional information and clarification concerning the relationship of the preservation plan to the Comprehensive Plan of the District of Columbia, Federal and District Elements. GSA and consultants agreed to look into this request at the December 11 meeting. We look forward to reviewing the text in the revised draft plan.

Statements, however, were made at the December 11 meeting that the McMillan Plan has been "superseded". We would appreciate clarification on this point and request that the clarification address the relevance of and the respect due the McMillan Plan² in the areas of planning and preservation. Also, in particular, what is the relevance of and the respect due the McMillan Plan for the Soldiers' Home property, occupying as it does an equivalent position in the overall development of the parks system of the District of Columbia as Rock Creek, the agglomerate of Fort Circle Parks, St. Elizabeths, Arlington National Cemetery and dare we say the Mall?

The Introductory statement of the Historic Features Element of the Comprehensive Plan, in stating the goal of the federal government, makes direct reference to the McMillan Plan:

*It is the goal of the federal government in the National Capital Region to preserve and enhance the image and identity of the nation's capital and region through design and development that is **respectful of the guiding principles of the L'Enfant and McMillan Plans**, the enduring value of historic buildings and places, and the symbolic character of the capital's setting.*

² We assume the definition of the "McMillan Plan" as found in NCPC documents: "The body of plans for the systematic improvement and extension of parks and public buildings sponsored by Senator James McMillan on behalf of the U.S. Senate in 1901 and set forth in "Report of the Park Commission" (Senate Document No. 166), 1902, as subsequently realized under guidance of the Architect of the Capitol, the Commission of Fine Arts, and the National Capital Park and Planning Commission. Comp Plan, p. 206

Our reading of the above statement suggests that a great deal of respect is due the McMillan Plan, being mentioned second only to the L'Enfant Plan.

Further, the citizen based initiatives of Washington Central Parks to unite and connect such remnants of the McMillan vision as still remain in the north central sector of the District, the recently enacted District Elements of the Comprehensive Plan for the District recognizing the need for significant open space networks in the north central sector of the District and the Committee of 100's own efforts publicizing the interconnectivity in linking green open spaces in a coherent urban pattern—the “emerald necklace” of the McMillan vision—all suggest that the McMillan vision as evidenced in the McMillan Plan remains a vibrant and viable framework or armature for land development patterns that establish the character and *genius loci* of Washington as a green, horizontal city. Unless we—collectively—make the right choices on the remaining large tracts of land that still retain some degree of openness and the green connectors between these large tracts we risk turning the historic emerald necklace into a concrete necklace, figuratively and literally choking the city at its periphery.

It is hoped that several policies of the Historic Features Element (Stewardship section) would also be addressed in the revised preservation plan. These policies would include, but not necessarily be limited to:

3. Support campus master planning and other planning initiatives as an opportunity to evaluate potential historic resources and to develop management plans for their protection and use.
5. Identify and protect both the significant historic design integrity and the use of historic landscapes and open space.
6. Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.
7. Protect significant archaeological resources by leaving them intact, and maintain an inventory of sites with a potential for archaeological discovery.
8. Conduct archaeological investigations at the earliest phases of site or master planning phases in order to avoid the disturbance of archaeological resources.
9. Use historic properties for their original purpose or, if no longer feasible, for an adaptive use that is appropriate for the context and consistent with the significance and character of the property.

11. Ensure that new construction is compatible with the qualities and character of historic buildings and their settings, in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the *Guidelines for Rehabilitating Historic Buildings*.

12. Coordinate with local agencies, citizen groups, and property owners in the identification, designation, and protection of historic properties, public and private, since collectively these resources reflect the image and history of the National Capital Region.

13. Work cooperatively with local agencies to ensure that development adjacent to historic properties not detract from their historic character.

14. Recognize that historic federal properties are sometimes important for local history and ensure that locally significant characteristics or qualities are maintained.

The Committee of 100 thanks GSA for the opportunity to comment on the preservation plan and looks forward to future discussions.