

The Committee of 100 on the Federal City



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Ms. Nancy Witherell, Regional Historic Preservation Officer
Office of Planning and Design Quality
Public Buildings Service
U.S. General Services Administration
301 Seventh Street, SW, Room 4004
Washington, DC 20407

SUBJECT: Potomac Hill Campus Master Plan, Section 106 Review
Comments on Goody Clancy Berger Alternatives, January 22, 2015,
Revised

Dear Ms. Witherell:

The Committee of 100 on the Federal City (Committee of 100) is pleased to provide the following comments on subject Alternatives presented by you to Consulting Parties at your meeting on January 13, and revised on January 22, 2015. The OSS Society endorses these comments.

At your initial meeting with Consulting Parties on July 29, 2014, the U. S. Department of State representative noted that the department was seeking 1.2 million square feet of space in an effort to consolidate over 60 functions and activities presently housed in rented commercial space in the Washington, DC metropolitan area. We understand the importance of your agency's role in working to achieve maximum use of the Potomac Hill site for the U.S. Department of State while simultaneously recognizing and acknowledging the site's historical significance since the time it was identified by Pierre L'Enfant in his 1791 Plan for the City of Washington.

Our comments and questions are guided by the Committee of 100's position statement on this project, approved by its Trustees on July 10, 2014, and forwarded to you on July 15, 2014:

The historic buildings on the Potomac Hill campus, including as much as possible of the existing plan, landscape and open space of the site, should be preserved and protected, and the scale, extent and design of any new construction on the site should respect these

structures and not diminish their prominence and interrelationships. The Historic Preservation Subcommittee is authorized to represent the Committee of 100 in any testimony, meetings or other actions before government agencies that may be necessary to accomplish this goal.

From documentation provided by you, we understand that the General Services Administration (GSA) has determined the following:

- The site is the highest point in the 1791 L'Enfant Plan for the City of Washington;
- The site served as a Marine encampment predating the Eighth and I streets, SE, barracks;
- The topography was critical in the site's selection for location of the US Naval Observatory in 1842;
- The Old Naval Observatory (Building 2) was listed in the DC Inventory of Historic Sites on November 8, 1964, designated a National Historic Landmark on January 12, 1965, and listed on the National Register on October 15, 1966;
- A draft National Register nomination was prepared by the U.S. Navy in 1993 for an Old Naval Observatory Historic District, followed in 2011 by a draft nomination prepared by the DC Preservation League, which was submitted to the DC Historic Preservation Office;
- In 2010, GSA prepared a draft nomination for the E Street Complex Historic District (Navy Hill) to the National Register;
- In 2013, an E Street Complex Historic District (Navy Hill) nomination was prepared by the DC Preservation League and submitted to the DC Historic Preservation Office;
- GSA has determined the period of significance of the site to be 1844 – 1961;
- GSA has further determined that the entire site is National Register-eligible;
- GSA has Design Guidelines and an Historic Landscape Assessment in development for consultation; and
- Preparation of a nomination unifying the entire campus into one historic district is underway by GSA based on the most recent nominations and updated assessment.

The Committee of 100's understanding of alternatives for site development prepared by your consultant Goody Clancy Berger is as follows:

No Action Alternative:

Building 2 (Old Naval Observatory) is maintained, [but not rehabilitated?].
Buildings 1, 3, 4, and 5 and Central, East, and South Buildings are rehabilitated.
Campus profile is retained with Observatory dome as the highest point on the site.
Gross Square Footage (GSF) achieved: 277,925

Development Alternative 1:

Building 2 (Old Naval Observatory) is rehabilitated.
Buildings 1, 3, 4, and 5 and the East Building are retained. [May we assume they are rehabilitated here and in the following alternatives?]
Central and South Buildings demolished.
Three new buildings are proposed for the west side of the site: North (9 stories) West (7 stories), and South (5 stories,)

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A new South Slope Building (7 stories) is proposed on the southeast corner of the site along 23rd Street, NW, where the street slope downward toward Constitution Avenue, NW.
GSF achieved: 969,904.

Development Alternative 2:

Building 2 (Old Naval Observatory) rehabilitated.

Buildings 1, 3, 5, and East and South buildings are retained.

Buildings 4 and Central are demolished.

Two new buildings are proposed for the west side of the site: North (6, 9, and 3 stories), and West (6 stories).

A new South Slope Building (7, 3, and 6 stories) is proposed for the southeast corner of the site along 23rd Street, NW, and along the southern boundary of the site.

GSF achieved: 864,721

Development Alternative 3

Building 2 (Old Naval Observatory) rehabilitated.

Buildings 1 and 3, and East and South buildings are retained.

Buildings 4 and 5 and Central Building are to be demolished.

New North (10 and 5 stories) and new West (5 stories) buildings are proposed on the west side of the site.

New South Slope Buildings (3, 4, 2, and 6 stories) along 23rd St., NW, at the southeast corner of the site, and along the south boundary are proposed.

GSF achieved: 853,581

The Committee of 100 has not identified any preferred alternative at this time, but in evaluating the choices we have identified the following questions and concerns:

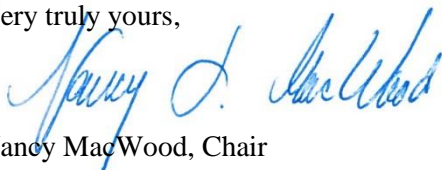
- At the July 31, 2014 Consulting Parties meeting the U. S. Department of State representative indicated that if his department achieved an amount of GSF that it deemed appropriate for its space needs, the Old Naval Observatory would be restored inside and out and that the restored building would be used by the department. At what point will Consulting Parties know State's estimate of its optimal space needs from this site? Will State's statement that it would restore the interior and exterior of the Old Naval Observatory be a commitment recorded in writing?
- If GSA has determined that all the existing buildings on the Potomac Hill site are National Register-eligible, what is the rationale for demolishing some of them?
- This site is compact because of the number of existing buildings on it. All of the Development Alternatives show the existing historic site being more or less figuratively closed in on the west and south contributing to a sense of claustrophobia. What steps does your consultant propose to correct this situation?
- Has Goody Clancy Berger considered placing more floors below ground to reduce proposed building heights?
- The Goody Clancy Berger Alternatives package has identified the dome of the Old Naval Observatory as the existing high point on the site. Two section drawings—Looking East and Looking North—then

illustrate how proposed new construction relates to it. The section drawing Looking East for Development Alternative 2 leaves out the 7-story building along the south access road, but does show the 3- and 6-story South Slope Building. Where was the section drawing sliced? We consider leaving out the 7-story building a serious oversight and ask that a new section drawing be prepared that shows it, even if it hides the two less tall proposed buildings to its east.

- In the same manner, the proposed 4-story building along the south access road is left out of the Looking East section drawing for Alternative 3. Leaving it out makes proposed new construction in this section drawing look less intrusive than it may likely be with the proposed 4-building complex, which also appears to have an additional half story at grade . Providing an additional section drawing looking east, with the slice moved farther to the west will include this structure and be helpful in future decision-making on the Alternatives.
- GSA had identified the Area of Potential Effect & Viewshed (APE) in a small aerial view on page 4 of its January 13, 2015 handout. To enable Consulting Parties to further evaluate the Development Alternatives computer-generated views need to be provided looking from the inside of the existing campus toward the west and toward the south. These views should include the profile of proposed new construction, including penthouses, that would be visible above existing buildings. For example, the section views should be from the height of an adult standing on the ground in front of the north façade of Building 2 (Old Naval Observatory) looking west and northwest so that the compromise of the existing viewshed is identified. Similarly, ground level views looking southward from in front of Building 2's east façade will help identify how proposed new construction may interrupt and thus compromise that viewshed looking southward.
- Building 5 is identified in Development Alternative 3 for demolition. In 2014, GSA awarded a multi-million dollar contract to the Grunley organization to rehabilitate the structure. Why is this building now proposed for demolition?

Your comments on the above will help us further refine our thinking on this master plan proposal.

Very truly yours,



Nancy MacWood, Chair
The Committee of 100 on the Federal City



Charles F. Pinck, President
The OSS Society