

Advisory
Council On
Historic
Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

February 7, 1992

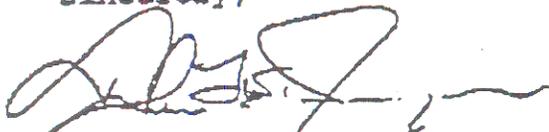
The Honorable Richard G. Austin
Administrator
General Services Administration
18th and F Streets NW
Washington, DC 20405

Dear Mr. Austin:

A panel of Council members met in Washington on January 27, 1992, to review the master development plan for the Southeast Federal Center in Washington, District of Columbia. It has been determined that this undertaking will affect the Washington Navy Yard Annex Historic District, a property which is eligible for listing in the National Register of Historic Places. The panel has completed its deliberations, and the comments of the Council are enclosed. In accordance with Section 106 of the National Historic Preservation Act and the Council's regulations, "Protection of Historic Properties" (36 CFR Part 800), the General Services Administration is required to consider the comments of the Council in reaching a final decision on the project. Following such consideration, we ask that you please notify us of the agency's finding.

In addition to the substantial issues intrinsically associated with the Southeast Federal Center project, the panel also identified shortcomings in how the Section 106 process was carried out by the National Capital Region. Accordingly, the Council offers specific recommendations in this regard that I hope will receive your personal attention as well.

Sincerely,



John P. W. Rogers
Chairman

Enclosure

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Advisory Council On Historic Preservation

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Washington, DC 20004

COMMENTS

By a Panel of
the Advisory Council on Historic Preservation
On the Master Development Plan for the
Southeast Federal Center
by the General Services Administration

Washington, District of Columbia
January 27, 1992

I. INTRODUCTION

On January 27, 1992, a panel of members of the Advisory Council on Historic Preservation met in Washington, District of Columbia, to consider the master development plan of the General Services Administration (GSA) for the redevelopment of the Southeast Federal Center as a major Federal office center. The panel met pursuant to Section 800.6(b) of the Council's regulations, "Protection of Historic Properties" (36 CFR Part 800), which implement Section 106 of the National Historic Preservation Act, as amended (16 U.S.C. 470f).

The master plan for the redevelopment of the Southeast Federal Center calls for the creation of more than five million square feet of office and retail space in a combination of rehabilitated industrial buildings and new structures located wholly within the boundaries of the Washington Navy Yard Annex Historic District, a property eligible for inclusion in the National Register of Historic Places. The development program will require the demolition of 10 buildings, four of which contribute to the significance of the historic district. After lengthy consultation between GSA, the District of Columbia Historic Preservation Officer (HPO) and the Council, GSA terminated consultation and requested the Council's comments. The Chairman determined that a panel of Council members would review the case on behalf of the full Council. The selected panel consisted of John Reynolds, expert member who chaired the panel, Katherine Boyd, citizen member, and David Nummy, Assistant Secretary of the Treasury for Management, representing the Secretary of the Treasury.

On the morning of January 27, the panel visited the site and had an opportunity to question GSA representatives about the scope of

the proposed redevelopment plan and the condition of the site and the buildings. A public meeting, attended by more than 70 individuals, was convened in the afternoon, and the panel heard presentations by GSA, the District of Columbia HPO, and Council staff. During the public comment period, the panel received testimony from local elected officials, representatives of preservation organizations, and private citizens. Based on its review of agency presentations, information gathered during the onsite inspection, and testimony from the public, the panel arrived at the following findings and recommendations.

II. FINDINGS

A. GSA's Goal at Southeast Federal Center is Admirable

The Washington Navy Yard Annex Historic District, which features an assemblage of early industrial buildings, remnants of the Pierre L'Enfant city plan, and significant archaeological remains, is an important link to the history of the Nation's capital and its significant industrial past. GSA's goal to redevelop this site is commendable for many reasons. A genuine strength of the Master Plan is the stated objective to enhance and reflect the distinctive history and architecture of the historic district as a guiding design principle in the overall development. Specifically, the rehabilitation of Buildings 74, 202, 167, 170, 160 and 173 and the retention of Buildings 116 and 118 on the site forcefully reinforce this objective, as does the retention of the sentry tower and wall. The reintroduction of certain elements of the L'Enfant city plan, most notably the continuation of New Jersey Avenue into the site to the urban square and the creation of a strong east-west axis along Tingey Street is laudable. GSA's plans represent a significant Federal reinvestment in this area and, along with renewed private sector development interest that will no doubt result, promise to "reclaim" the Annex and surrounding area within the urban mainstream. GSA's decision to be the first tenant agency is bold, and should provide a sound foundation for generating interest among other agencies who may have initially been unwilling to relocate to this area.

B. Demolition of Certain Historic Structures Justified

The Council concurs with earlier findings that the demolition of Buildings 158, 159-E and 187 are necessary to carry out the goals of the master plan. GSA has provided sound justification for its action which, while unfortunate, does afford an opportunity for thoughtful redevelopment of the site.

C. Building 159

For a number of reasons, Building 159 is highly important to this site. Its location at the foot of the extended New Jersey

Avenue and its position relative to the other historic industrial buildings which are to be rehabilitated on the site and the adjacent District of Columbia Pumping Station, make it an important visual anchor to the Historic District. Its rehabilitation, which would include restoring its distinctive historic fenestration, would reinforce the design objectives of the Master Plan and would clearly demonstrate the commitment of GSA to the historic preservation values of the site, especially since this would be the first major improvement at the site. To the contrary, its removal would set an unfortunate precedent and would constitute a serious loss to the integrity of the historic district. A substantial cost differential between new construction and rehabilitation has not been demonstrated, nor has GSA shown that rehabilitation, in conjunction with new construction, would not satisfy square footage and program needs. Further, the concept plans for a new building on the site presents major design problems. The design does not appear to maintain historic vistas down New Jersey Avenue and Third Street, a principle called for by the action of the National Capital Planning Commission. In addition, the new construction proposal does not successfully harmonize with the character of the Historic District and the distinctive architectural elements of the District of Columbia Pumping Station.

D. GSA's Role in Consultation Needs Close Examination

GSA's handling of its Section 106 responsibilities for the Southeast Federal Center project has been unfocused and poorly executed. It is clear that the consultation process has not been conducted by GSA in a manner designed to permit full consideration of historic preservation issues and the public interest in the site. While communication is the responsibility of all parties in consultation, the record is clear that GSA abandoned consultation prematurely and unilaterally when asked by the consulting parties to give meaningful consideration to a limited number of outstanding issues.

III. RECOMMENDATIONS

Based on the above findings, the Council offers the following recommendations.

A. Reconsideration of the Demolition of Building 159

GSA should give prompt and meaningful consideration to the retention of Building 159 at the Southeast Federal Center. Such consideration should include detailed and thorough studies of the following: (1) cost comparisons of the rehabilitation of Building 159 versus new construction; (2) sight line comparisons of each option to document vistas down both New Jersey Avenue and Third Street to the Anacostia River; (3) renderings of elevations of the site (particularly down New Jersey Avenue and across the

urban square) with the rehabilitated Building 159 retained on its site; (4) interior floor plan modifications that might permit additional square footage within a renovated Building 159; (5) options for alternative parking facilities; and, (6) studies of collaborative development of new construction with the rehabilitation of Building 159 to provide additional square footage. Only after such studies are completed should GSA decide how development at this site should proceed.

B. New Construction at the Southeast Federal Center

Should GSA, upon the completion of the studies in Recommendation A, above, insist upon the demolition of Building 159, GSA should establish design guidelines for the replacement structure. GSA should ensure that any replacement structure does not obstruct the New Jersey Avenue vistas, nor should it block the alignment of Third Street in any manner. GSA should ensure that any replacement structure is designed with a clearly industrial character in response to its prominent location on the site.

C. Site Interpretation

In consultation with the District of Columbia HPO, GSA should develop a suitable plan for interpreting the history of the Navy Yard Annex, as illustrated by extant and former historic buildings, the archeological record, and significant industrial archaeological components. The plan should provide for development and installation of displays, exhibits, signage, and other means (such as the recreation of the historic gate) to interpret the site and educate the public regarding this important part of the City of Washington's social and economic development. Following approval by the District of Columbia HPO, the recommended treatments in the plan should then be implemented and integrated within the overall Southeast Federal Center development. GSA should give careful attention to the considerable industrial elements present on the site today, salvaging that which can be used to reinforce the industrial character of the site in relation to street furniture.

D. Archaeology

Upon consultation with the District of Columbia HPO, GSA should carry out further steps to identify the extent, nature, and significance of archeological deposits at the Southeast Federal Center site. Following such efforts, GSA should ensure that a data recovery plan is developed in consultation with the District of Columbia HPO for the recovery of archeological data from the project site. The plan should be consistent with the Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 FR 44734-37) and, following approval by the District of Columbia HPO, should be implemented.

E. Design Considerations

All design plans and specifications for reuse and rehabilitation of historic structures on the project site should conform to the recommended approaches set forth in the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. All such plans and specifications should be developed in consultation with the District of Columbia HPO and approved by the District of Columbia HPO prior to the initiation of construction.

Plans and specifications for all improvements, including site plans, landscaping, and new construction, should seek to enhance compatibility with the massing, size, scale, and architectural features of both those historic structures to be retained and those in the immediate vicinity of the site. Design goals to reflect the industrial character of the site are encouraged, although care should be taken to clearly differentiate new construction from existing historic fabric. Further, all possible opportunities should be sought to reinforce and strengthen critical elements of the L'Enfant plan, most notably street placements, vistas, and relationships to the Anacostia River.

F. Meaningful Compliance With Section 106

GSA should undertake an intensive examination of how it administers the Section 106 review process in the National Capital Region. In so doing, it should seek methods to improve coordination between its various offices to ensure that opportunities for meaningful consultation with the State Historic Preservation Office and the Council are not disregarded. GSA should identify problems which were brought to light as a result of the Southeast Federal Center consultation process, and seek methods to ensure that similar problems do not occur in the future. In undertaking these improvements GSA is encouraged to seek input and advice from the Council.

G. Reporting

As development of the Southeast Federal Center proceeds, GSA should periodically report to the Council on the steps it has taken to address historic preservation concerns associated with this project, with particular focus upon the consideration of Recommendations A and B, above. This information should be conveyed through written reports but may also, upon request of the Council, include presentations to Council members at regularly scheduled Council meetings.