

# Advisory Council On Historic Preservation

The Old Post Office Building  
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## EXECUTIVE DIRECTOR'S REPORT

### Redevelopment of the Southeast Federal Center Washington Navy Yard Annex Historic District

#### Introduction

The National Capital Region of the General Services Administration (GSA) proposes to redevelop the Southeast Federal Center (SEFC) as a major Federal office center. As planned, the SEFC will consist of over five million square feet of office space in a combination of rehabilitated industrial buildings and new office structures, and will require the demolition of 10 buildings, four of which are structures that contribute to the significance of the Washington Navy Yard Annex Historic District, a property eligible for inclusion in the National Register of Historic Places.

#### Section 106 Involvement

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the Council's implementing regulations, "Protection of Historic Properties" (36 CFR Part 800), in October, 1989, GSA provided to the Council and the District of Columbia State Historic Preservation Officer (SHPO) copies of the proposed redevelopment master plan. At that time, discussions between the consulting parties were initiated to examine project goals and objectives in detail, and to explore alternatives that might avoid or lessen adverse effects to the Washington Navy Yard Annex Historic District. Although considerable progress was made toward reaching a Memorandum of Agreement, GSA abruptly terminated consultation on December 12, 1991.

#### Issuance of Council Comments

Pursuant to §800.6(b) of Council regulations, Chairman John F. W. Rogers appointed a panel of three Council members to review the matter, and directed that the panel meet in Washington in public session. Following the panel meeting, the Council will issue formal comments to the Administrator of GSA. This report has been prepared to assist the Council panel in the formulation of its comments.

## The Proposed Redevelopment of the Southeast Federal Center

### Location and Present Conditions

The SEFC site is located in southeast Washington, D.C., south of M Street SE, west of the Washington Navy Yard National Historic Landmark, and north of the Anacostia River (see Figure 1). The site is generally industrial in character with several under-utilized historic industrial buildings, overhead steam and utility lines, and vacant parcels of property (see Figure 2). Prominent features include the Anacostia River, the Washington Navy Yard power plant stacks, and the Washington Navy Yard docks where the U.S.S. Barry, a National Historic Landmark, is docked.

### Evolution of the Redevelopment Plan

Although the SEFC site was at one time a major United States Navy ordnance production facility, after World War II the Navy gradually curtailed production there and by 1962 all such activities had ceased. The Navy exceded the property in 1963--although it retained ownership of the Navy Yard itself--and transferred ownership of the Annex to GSA.

In 1963, agencies involved in the fate of the SEFC and the Navy Yard Annex, including private concerns, the National Capital Planning Commission and GSA, began to offer plans for the site's redevelopment. The plans varied greatly and included recommendations that ranged from wholesale demolition and new construction to retention of all of the buildings on site accompanied by relandscaping and other site improvements.

### Current Proposed Redevelopment Plan

The redevelopment scheme currently proposed was presented by GSA to the District of Columbia SHPO and the Council in October 1989 as a master plan document. The plan is similar to earlier plans in that it calls for the demolition of significant historic structures on the site and substantial new development. However, the plan differs from its predecessors in many important ways, including the density of the development, the boundaries of the project area, and the general program scheme.

The site and its surrounding neighborhood have changed significantly since the Navy exceded the Annex in 1963; these changes have undoubtedly influenced GSA's development proposals. The Navy's commitment to adaptively reusing its historic industrial buildings and the Navy Yard's designation as a National Historic Landmark has provided a benchmark to the community of the inherent value of the historic structures on the site and their adaptability to new uses. In addition, the Washington Metro Rail System has recently extended further south: the Navy Yard station, which is immediately adjacent to the

northwest corner of the SEFC, opened in late 1991. Commercial real estate developers have begun speculation in the area, and local officials expect that the GSA's development will accelerate rising property values and trigger the redevelopment of the southeast quadrant of the city, including the Anacostia waterfront.

GSA's redevelopment plan proposes to initiate significant office construction, develop an urban waterfront and riverfront drive, and introduce a new street system based in part upon the prevailing configuration (see Figure 3). Additionally, the redevelopment program calls for the rehabilitation and adaptive use of three historic industrial buildings for the purposes of "festival retail," together with the rehabilitation and adaptive use of three industrial buildings for offices. The first tenants for the scheduled new construction would be GSA headquarters and the Army Corps of Engineers.

## Historic Properties

### Introduction

The SEFC site is located precisely where the city of Washington underwent considerable residential and commercial development in the early 19th century following completion of Pierre L'Enfant's plan for the city. Highly significant historic sites and districts are, therefore, in the immediate vicinity. For example, to the north and west of the SEFC is located the Capitol Hill Historic District. Specific historic properties which may be affected by the construction of the SEFC are described below.

### The Washington Navy Yard Annex Historic District and the Washington Navy Yard National Historic Landmark

The Washington Navy Yard Annex Historic District lies immediately west of the Washington Navy Yard National Historic Landmark. The district was historically one of the first areas in Washington to be developed, following the designation of the Washington Navy Yard as the home port for the U.S. Navy in 1801 and the Navy Yard's subsequent development as a major shipbuilding center. The Navy Yard Annex area rapidly filled with wharves, warehouses and commercial structures, along with a community that was home to several prominent early Washingtonians and a substantial working-class population. A portion of the canal system contained in the L'Enfant plan for the Nation's capital was constructed and served the waterfront commercial properties.

As the Navy's need for industrial building space increased and its focus shifted from shipbuilding to ordnance production in the late 19th and early 20th century, the Navy expanded the Navy

Yard to the west; the Navy Yard Annex site was gradually transformed from a commercial and residential area into an industrial complex, and the residential character of the western sector of the Annex ended. The Annex became the construction site for large industrial buildings in which the Navy produced the larger weapons necessary for the Spanish-American War, World War I and World War II. By the early 1940's, the Navy Yard Annex was the center of a vast, nationwide weapons production system and the site for the manufacture of enormous guns for the Naval fleet. Many buildings remain from the Annex's period of rapid growth and use as a munitions manufacturing area. Some of the largest of these are targeted for demolition by GSA in its master plan.

The Washington Navy Yard was designated as a National Historic Landmark in 1976. The Washington Navy Yard National Historic Landmark remains as an industrial complex today, with its industrial buildings having been converted to commercial use or, in some cases, remaining as industrial buildings. In addition, "the Yard," as it is known locally, is the home port of the National Historic Landmark U.S.S. Barry.

In 1977, the Keeper of the National Register of Historic Places found the Navy Yard Annex Historic District eligible for inclusion in the National Register as an historic district, including all the land, buildings, and structures within its boundary. In reviewing GSA's plan for the site, the following buildings are of special note (please refer to Figure 2 for location of these buildings on the SEFC site):

**Building 74 -- Transportation Repair Shop**

Constructed in 1898 and moved to its present location in 1938, this long two-story brick building has already been converted to office and storage space. It is similar to the buildings in the Navy Yard National Historic Landmark and is smaller than the other buildings on the SEFC site.

**Building 158 -- Brass Foundry**

Built in 1918, the foundry is a very large building with an unmistakable industrial character. The National Register marks it as having special architectural interest. The foundry is steel-framed and covered with a cement stucco; its enormous clear-span space is lit by a series of clerestory and monitor windows.

**Building 159 -- General Machine Shop**

Built in 1919, the General Machine Shop is a massive five-story building of reinforced concrete frame construction. The upper four floors wrap around a central light court and the interior has been remodeled into office space. Most of the windows have been bricked in, although the upper floor still retains original metal sash industrial windows.

**Building 159E -- General Machine Shop Annex**

Attached to Building 159, Building 159E was constructed in 1940. A very small building in plan, it is attached to Building 159 by a small bridge and is generally of the same construction. It has been recently remodeled into office space and none of its original windows remain.

**Building 160 -- Pattern/Joiner Shop**

Built in 1917 of exposed reinforced concrete frame construction with brick infill panels, Building 160 is four stories tall with three top floors surrounding a central light court. All exterior windows have been replaced, and the building has been remodeled into office space.

**Building 167 -- Boiler Maker's Shop**

Built in 1919, this low building is distinguished by its two-tiered monitor roof and clerestory windows. The building has an interior clear-span open bay and is 100 feet wide by 320 feet long.

**Building 170 -- Electric Sub-Station**

Built in 1919, this small steel-framed building has a metal shed roof and monitor roof with brick side walls. Generally small -- only two stories high -- the building has a 34-foot interior open bay. The building is still used an electric substation.

**Building 173 -- Lumber Storage Shed**

Built in 1919, this quite small two-story reinforced concrete frame structure was built as a shelter for lumber and was originally open on all sides. It was recently covered in corrugated metal, although its louvered monitor roof structures remain, and is identified by the National Register as of special architectural merit.

**Building 187 -- Brass Smelt**

This two-story steel structural frame building with brick walls was constructed in 1920 to house the Brass Smelt. The building is quite small and structurally unsound.

**Building 202 -- Gun Assembly Plant Extension**

A very distinctive building constructed in 1941, Building 202 is large with an interior open bay 72 feet high flanked by side aisles of six floors. The building, which has a steel structural frame, appears to retain its original windows. It is presently used for storage.

**Historic Urban Waterfront Archaeology**

Preliminary archaeological surveys completed to date as a result of the Section 106 process confirmed that the SEFC site holds the potential to reveal much about the early history of

Washington and its inhabitants, information which may well not be available elsewhere. Physical remnants of Washington's early residential development, including its distinctive 19th- and 20th-century working class alley dwellings, are most certainly a part of the site's rich archaeological record. Additionally, evidence of the city's early commercial history, including a significant portion of its the canal system has been discovered at the site. Due to their significance, the archeological resources are regarded as contributing elements within the National Register-eligible historic district.

### The L'Enfant Plan

After selection of the site for the Nation's capital was completed, President George Washington hired the French engineer Pierre L'Enfant to design the new Federal city. L'Enfant's plan (Figure 4), completed in 1791, consisted of a grid street system, bisected by avenues, with prominent sites designated for the President's House, Congress, the Mall, and public parks. L'Enfant also designed a canal system calculated to generate local commerce. The area of the SEFC was included within the boundaries of the L'Enfant Plan, with New Jersey Avenue, Second, Third, and Fourth Streets extending to the Anacostia River. Significant portions of the plan have already been determined eligible for inclusion in the National Register of Historic Places. Work is underway to consider the L'Enfant Plan for designation as a National Historic Landmark and, perhaps, as a World Heritage Site.

### **Effects to Historic Properties**

#### Beneficial Effects of Redevelopment

The Southeast Federal Center site presents many challenges for the redevelopers, given its location, condition, and almost complete lack of modern infrastructure. GSA's redevelopment scheme undeniably would provide significant economic benefits for the southeast quadrant of the city. Buildings 160, 202 would be rehabilitated for office space (Building 74 has already been converted to office use) and Buildings 170 and 167 would be rehabilitated for "festival retail" space; Building 173 could be rehabilitated for retail use later, based on sufficient demand. Further, the Anacostia River would be bulkheaded and a pedestrian promenade established, along with a riverfront drive and bikeway to connect with future development further west. Thus, GSA's plans represent a significant 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.

### Adverse Effects to Historic Resources

Although beneficial effects are undeniable, the comprehensive nature of these redevelopment plans do represent "major surgery" for the historic district. While isolated historic structures are scheduled for retention, the scale of the redevelopment proposal will result in the loss of those unifying elements that make the Annex an historic district. The changes proposed for the Annex are quite broad in scale; accordingly, the potential for negative effects is substantial. These effects fall within four general categories: (1) demolition of historic fabric; (2) design impacts resulting from conversion of historic buildings and new construction and consequent effects on remaining historic buildings on or adjacent to the Annex site; (3) destruction of archeological sites; and (4) alteration of the L'Enfant plan.

#### Demolition of Contributing Historic Properties

The GSA master plan slates Buildings 159, 159E, 158, and 187, for demolition. Buildings 159 and 187 are two of the largest industrial buildings on the site; Building 187 was cited by the National Register as having special architectural interest. These demolitions represent a significant loss of historic fabric.

#### Design Considerations

Incorporating commercial office space into an industrial area clearly presents obvious design challenges. At this point, GSA does not have specific design plans, although concepts under consideration highlight a number of possible concerns for impacts to historic properties.

The SEFC master plan calls for the construction of "industrial character" buildings along the waterfront in a self-styled "industrial character zone." Certainly this goal is laudable, but it will be difficult to achieve with authenticity. Without great care, this design vocabulary could result in new construction that creates visual confusion and competes with the remaining industrial buildings in the Annex and the neighboring Washington Navy Yard National Historic Landmark.

The renovation of historic buildings such as Building 170 and 167 for "festival retail" use raises the apparent issue of incompatibility. If the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards) are not closely followed in such a case, the subsequent renovation could result in the loss of architectural integrity. On the other hand, the master plan's call for the conversion and renovation of Buildings 160 and 202 to office space -- Building 74 has already been restored and

converted to office space -- seems more realistic. Given the form and condition of these particular buildings, conversion in adherence to the Secretary's Standards should be readily accomplished without adverse effect.

#### Historic Urban Waterfront Archaeology

The projected construction program would destroy virtually all of the site's archeological resources. Evidence suggests that these resources are significant primarily for the information they contain; data recovery is thus an appropriate treatment. Several factors, however, suggest that data recovery would be both complicated and costly. First, as a result of prolonged industrial use of the site, especially for ordnance production, potentially high levels of hazardous waste are present. Any data recovery plan would involve toxic waste considerations. Second, the relatively high watertable within the site would also pose obstacles. Finally, GSA's archeological survey and identification efforts to date have been impeded by GSA's decision to let a contract for preliminary archeological investigation of the site absent review by the Council and the District of Columbia SHPO. Further identification and evaluation efforts would be necessary before a proper research design could be developed for data recovery. Until this problem is corrected, delays to both data recovery efforts and construction schedules is likely.

#### The L'Enfant Plan

Although GSA's master plan contains a stated goal of re-establishing the L'Enfant Plan streetscape, close examination of the proposed site plan reveals that only Fourth Street would be completed to the waterfront; Second, Third and Fifth Streets would terminate before reaching the Anacostia. GSA has contended that the rationale for the demolition of Building 159 is, in significant part, based upon the need to extend New Jersey Avenue vistas to the waterfront, although there are no vista studies to support this contention and existing site maps show that Building 159 apparently does not block this vista. Their site plans show that the replacement building for Building 159 will be three stories taller and have a larger footprint than Building 159 and will be located on the same site. In addition, the retention of Building 159 would provide for the continuation of Third Street to the Anacostia River and for the substantial continuation of the vista of New Jersey Avenue to the riverfront.

#### Public Interest and Involvement

The degree of public interest in GSA's plans is difficult to ascertain. In this case there has been a virtual absence of commentary and interest on the part of citizens and local groups, a condition that is highly atypical in Council cases that reach

the termination stage. Given the large scale of the project, the extent of impacts to historic properties, and the project's setting in a highly dense and largely residential area, the apparent lack of public interest led the Council to question the steps GSA had taken to inform the public of its plans and to seek public input. Such input is of primary importance since Council regulations encourage maximum public participation in the Section 106 process.

Upon closer examination it appears that GSA efforts to solicit the public's views have been limited. In documentation submitted to the Council, GSA implies that the opportunity for public input was provided when the project was reviewed by the National Capital Planning Commission (NCPC) and the Commission of Fine Arts, presumably on the basis that such meetings were open to the public. (Both agencies approved GSA's master plan, with NCPC approval conditional upon GSA first satisfying its Section 106 responsibilities.) The only affirmative action taken by GSA to inform the public of its current plans was a "scoping" meeting on June 19, 1991, called as a prelude to the preparation of an Environmental Impact Statement for the construction of the eastern portion of the SEFC. According to GSA no one at the meeting mentioned historic preservation as a concern.

Meanwhile, reaction from various recipients of the notice of the Council panel meeting on January 27, 1992, suggests that many local groups and organizations were simply unaware of the scope and schedule of GSA plans. While GSA may have taken steps to meet basic public notice requirements for the National Environmental Protection Act process, these efforts fall short of recommendations in Council regulations which require an agency to "adequately inform the public of preservation issues in order to elicit public view on such issues that can be considered and resolved, when possible, in decisionmaking." There is no evidence that GSA undertook such a program for the site. Indeed, GSA's Federal Register notice for construction of its headquarters on this site does not mention the historic district, much less the contemplated demolition of historic properties. For these reasons, it would appear that the Council panel meeting may be the first genuine opportunity for citizens, organizations, and elected officials to respond to the historic preservation issues posed by SEFC project.

#### Analysis of Consultation

In his letter to the Council conveying GSA's decision to terminate consultation, GSA Administrator Richard Austin asserted that the agency had been in consultation with the Council regarding SEFC "since 1966." Although over the years GSA may have periodically notified the Council as proposed plans for the SEFC evolved, it was not until October 1989 that GSA officially initiated consultation with the Council on the master plan as it

is now proposed. Consultation initially focused on design issues as well as options to demolition and treatment of archeological resources.

The subsequent discussions were hampered by GSA's insistence that its Section 106 responsibilities had been satisfied in 1985 when the Council received an earlier version of the master plan. The District of Columbia SHPO and the Council worked to convince GSA that the plans were substantially different. More than four years had elapsed since the last plan was put forward and conditions on the site had changed. Many of the potential adverse effects to historic structures identified by the consulting parties for the 1989 plan were identical to those raised by the consulting parties in 1985 and the consulting parties agreed, as they had in 1985, that a cost-benefit analysis for the proposed demolition of the four historic structures would be necessary before substantial agreement could be reached as to their fate. Almost two years elapsed before the documentation was provided to the District of Columbia SHPO and the Council in mid-1991.

Second, it was learned that GSA had let a contract for an archeological investigation on site absent review of the contract by the District of Columbia SHPO. It was not until August 1991 that GSA conceded its shortcoming in the archeological survey methodology and agreed with the other consulting parties that the entire site should be considered significant for its archeological potential.

These impediments notwithstanding, consultation continued to progress. Resolution was, in fact, achieved on Buildings 159E and 187 when the Council and the District of Columbia SHPO agreed that their reuse was impractical and accepted GSA's plans for their demolition. The Council did request that GSA revisit its decision to demolish Building 158, citing its special architectural merit, but acknowledged that GSA's program goals for the site and the difficulty of converting it to commercial space combined to make the preservation of Building 158 a very difficult goal to achieve.

In correspondence dated August 15, 1991 (Figure 5), the Council delineated its questions concerning GSA's analysis for the demolition of Building 159. This analysis, which indicated that it was less costly per square foot to renovate Building 159 than to replace it with an building of "industrial character" on the same site, led both the Council and the District of Columbia SHPO to question demolition of the building. These questions, however, remained unanswered. The Council's hope was that such information would enable the consulting parties to resolve this single remaining issue and move forward with a Memorandum of Agreement, the general framework of which had already been agreed upon by GSA. Four months passed in which the Council heard

nothing from GSA; the silence was broken only on December 12, 1991, upon receipt of Administrator Austin's letter notifying the Council of GSA's intention to terminate consultation. Since this time, staff has learned that GSA has formally solicited requests for proposals for architectural and engineering design for significant portions of the site (including GSA's new headquarters building which is to be constructed on the site of Building 159), a development which raises serious questions about GSA's ability to consider the Council's comments in good faith.

### Conclusions and Recommendations

In the Council's view, GSA's handling of its Section 106 responsibilities for the SEFC project has been, at best, unfocused and poorly executed. It is clear that the consultation process has not proceeded in the manner envisioned by the regulations, nor has it been conducted by GSA in a manner that is designed to permit full consideration of historic preservation issues and public interest in the site. This is particularly regrettable, since there is overall merit to the project and good-faith consultation could have led to further improvements. Also, completion of a Memorandum of Agreement would have provided GSA with a planning guide applicable to future design development and treatment of archeological resources, which would ultimately serve to facilitate future GSA construction for the entire project.

In order to address the fundamental shortcomings in GSA's approach to the Section 106 process and to respond to the historic preservation issues posed by the SEFC site, the Executive Director offers for consideration by the panel members the following recommendations:

#### Administrative Improvements

- GSA should examine 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 planning office and its design and construction office and enhance opportunities for meaningful consultation with the State Historic Preservation Office and the Council. In undertaking these improvements GSA is encouraged to seek input and advice from the Council.
- GSA should explore more effective ways to solicit the views of the public concerning decisions GSA makes affecting historic resources in its National Capital Region. Specifically, GSA should improve outreach to local special interest groups, neighborhood organizations and representatives, and members of the interested public; ensure that such parties receive public notices that accurately convey historic preservation issues; and

encourage the public's active participation. Because the record of public interest for the Southeast Federal Center project suggests inadequate public involvement, GSA should consult with affected and interested members of the public, to include relevant Advisory Neighborhood Commission representatives, and conduct appropriate public meetings.

### Property Treatment

- Upon consultation with the District of Columbia SHPO, 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 SHPO 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 SHPO, should be implemented.
- 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 SHPO and approved by the District of Columbia SHPO 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.

To assist in the development of design and specifications for all site improvements, GSA should convene an advisory panel of government experts, to include representatives from the District of Columbia SHPO, the National Park Service, the National Capital Planning Commission, and the Commission of Fine Arts. Such a panel should be provided adequate opportunity to review plans as they are developed and the

views of the plan should be given careful consideration by GSA as it proceeds with the project's design and construction.

- GSA should reconsider plans to demolish Building 159. This reconsideration should include a detailed cost analysis that would permit a fair appraisal of the relative merits of reuse of this structure versus new construction. The cost analysis should factor in demolition costs and a comparable analysis of the life-cycle costs for each option. If such an analysis reveals that reuse of Building 159 would be less costly and GSA decides to proceed nevertheless with demolition and new construction, GSA should provide to the Council and the District SHPO a notice of this decision and an explanation of how the decision was reached.
- Prior to any demolition of contributing elements within the Navy Yard Annex Historic District, GSA should contact the National Park Service (Historic American Building Survey or Historic American Engineering Record, as appropriate) and follow the recommendations of that agency to ensure that the structures are recorded to proper standards and that those records are filed in suitable depositories.
- In consultation with the District of Columbia SHPO, GSA should develop a suitable plan for interpreting the history of the Navy Yard Annex, as illustrated by extant and former historic buildings and the archeological record. The plan should provide for development and installation of displays, exhibits, signage, and other means, as appropriate, 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 SHPO, the recommended treatments in the plan should then be implemented and integrated within the overall Southeast Federal Center development.

#### 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. 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.