

DEC 5 1991

Dr. Robert Bush
Executive Director
Advisory Council on Historic Preservation
The Old Post Office
Washington, DC 20004

Dear Dr. Bush:

The General Services Administration (GSA) has consulted with the Advisory Council on Historic Preservation (ACHP) and the District of Columbia Historic Preservation Office (SHPO) regarding the historic preservation concerns at the Southeast Federal Center (SEFC) since 1967. In consideration of this extensive consultation and the SHPO's and ACHP's letters of August 15, 1991, GSA finds that further consultation concerning the SEFC Master Plan will not be productive. Therefore, we wish to terminate consultation on the SEFC Master Plan at this time.

GSA requests that the ACHP provide final written comments within 60 days of receipt of this letter per 36 CFR Part 800.6(b)(1). I will notify the SHPO of this request by copy of this letter.

Enclosed please find the specific documentation required for Council comment absent a signed Memorandum of Agreement (MOA). This documentation includes the following:

- o Specific responses to the comments provided by the ACHP and the SHPO in their letters of August 15, 1991; and
- o Information required under 36 CFR Part 800.6 (d) concerning Council comment absent a signed MOA.

GSA has given close and careful consideration to the issues identified by the ACHP and the SHPO over the past six years. The enclosed documentation addresses their concerns.

If you have any questions, please contact Mr. James C. Handley, Regional Administrator on (202) 708-9100.

Sincerely,

(signed) Richard G. Austin

Richard G. Austin
Administrator

Enclosures

cc: Mr. John P. Bond, III, State Historic Preservation Officer

DOCUMENTATION REQUIRED FOR
ADVISORY COUNCIL ON HISTORIC PRESERVATION COMMENT
ABSENT A SIGNED MEMORANDUM OF AGREEMENT

GENERAL SERVICES ADMINISTRATION
NATIONAL CAPITAL REGION

NOVEMBER 1991

The following information is provided per "Introduction to Federal Projects and Historic Preservation Law, Section IV: Implementing: The Section 106 Process, Step 4: Council Comment, Absent a Memorandum of Agreement", page IV-27.

1. Description of the undertaking with photographs, maps, and drawings, as necessary.

RESPONSE: GSA has provided the Advisory Council on Historic Preservation (ACHP) and the District of Columbia Historic Preservation Office (SHPO) with the final draft Southeast Federal Center Master Development Plan, Keyes Condon Florance, Architects, 1989 (pp. 26-30 are most relevant to historic preservation issues).

2. A description of the efforts to identify historic properties.

RESPONSE: The following documents are relevant:

- A. Request for Determination of Eligibility to the National Register of Historic Places for the Washington Navy Yard Annex, Building Conservation Technology, Inc., November 1976.

GSA has enclosed this document in this package.

- B. Historic Preservation Analysis and New Construction Building Program for Buildings 158, 159, 159E, and 187, Keyes Condon Florance, Architects and Oerhleim & Associates Architects, May 1991.

Previously provided by GSA to the ACHP and the SHPO.

- C. Archeological Survey, Southeast Federal Center, Designtech-East, Ltd. and Engineering-Science, Inc., May 1991.

Previously provided by GSA to the ACHP and the SHPO.

- D. Phase I Archeological Survey Report, as amended, November 1991.

GSA has enclosed this document in this package.

3. A description of the affected historic properties, with information on the significant characteristics of each property.

RESPONSE: See #2A, the Request for Determination of Eligibility to the National Register of Historic Places for the Washington Navy Yard Annex and #2B, Historic Preservation Analysis and New Construction Building Program for Buildings 158, 159, 159E, and 187.

4. A description of the effects of the undertaking on historic properties and the basis for the determination.

RESPONSE: See #1, the final draft Southeast Federal Center Master Development Plan and the final draft Southeast Federal Center Environmental Assessment, Keyes Condon Florance, Architects, and David Volkert & Associates, 1983 and 1989 EA update (1983 EA, pp. 3-4 to 3-17).

The final draft Master Development Plan has been provided to the ACHP and the SHPO. GSA is enclosing a copy of the SEFC Environmental Assessment in this package.

5. A description and evaluation of any alternatives or mitigation measures that GSA proposes for dealing with the undertaking's effects.

RESPONSE: See #4, the final draft Southeast Federal Center Environmental Assessment (1983 EA, pp. 3-4 to 3-17).

Also, GSA has provided the SHPO and ACHP with a draft Memorandum of Agreement which identifies the mitigation measures we are proposing for dealing with the undertaking's effects.

6. A description of any alternatives or mitigation measures that were considered but not chosen and the reasons for their rejection.

RESPONSE: See #2B, Historic Preservation Analysis and New Construction Building Program for Buildings 158, 159, 159E, and 187.

7. Documentation of consultation with the SHPO regarding the identification and evaluation of historic properties, assessment of effect, and any consideration of alternatives or mitigation measures.

RESPONSE: This documentation is attached.

8. A description of GSA's efforts to obtain and consider the views of affected local governments, Indian tribes, and other interested persons.

RESPONSE: GSA has consulted with a variety of organizations concerning our plans, including the demolition of buildings 158, 159, 159E, and 187. Specifically, GSA has:

- o Received approval from the National Capital Planning Commission (NCPC) of the Southeast Federal Center Master Plan effective upon the completion of the Section 106 process. This review process involved:
 - Several consultations with the NCPC staff including the then historic preservation specialist, Nancy Taylor;
 - Coordination with the District of Columbia government, which expressed its strong support for the development of the SEFC;
 - Coordination with the Washington Metropolitan Area Transit Authority;
 - Coordination with the Metropolitan Washington Council of Governments;
 - Coordination with the National Park Service; and
 - A presentation of the master plan to the NCPC Commissioners and the general public at the January 4, 1990 Commission meeting.
- o Received approval from the Commission of Fine Arts (CFA) of the Master Plan. This review process involved:
 - Several consultations with CFA staff; and
 - A presentation of the master plan to the CFA Commissioners and the general public at the October 19, 1989 Commission meeting.
- o Conducted a scoping meeting as a first step in the preparation of an Environmental Impact Statement (EIS) for the construction of the eastern portion of the SEFC (east of an extended New Jersey Avenue) on June 19, 1991. The general public was invited to this meeting to advise GSA on issues of concern regarding the development of the SEFC. No one mentioned historic preservation issues at this scoping meeting.

When the draft EIS is completed this winter, GSA will provide copies to the general public for comment. GSA will also conduct a public meeting on the EIS.

Also, see #7, which describes GSA's consultations with the SHPO and ACHP.

9. The planning and approval schedule for the undertaking.

RESPONSE: This documentation is attached.

10. Copies or summaries of any written views submitted to the agency concerning the effects of the undertaking on historic properties and alternatives to reduce these effects.

RESPONSE: See attached.

- o National Capital Planning Commission report to the General Services Administration, January 4, 1990.
- o Government of the District of Columbia comments on the draft Master Development Plans (1983 and 1989).

The Planning and Approval Schedule
Southeast Federal Center Master Plan

Environmental Assessment prepared in 1983 and with a 1989 update

Environmental Impact Statement under preparation,
begun June, 1991.

Public Meetings:

EIS scoping meeting--June 19, 1991

Proposed EIS public meeting--February/March, 1992

National Capital Planning Commission approval, pending completion
of Section 106 compliance--January 4, 1990

Proposed Developer/Manager contract award--August 7, 1992

Proposed Design initiation--August, 1992

DOCUMENTATION REQUIRED FOR
ADVISORY COUNCIL ON HISTORIC PRESERVATION COMMENT
ABSENT A SIGNED MEMORANDUM OF AGREEMENT

GENERAL SERVICES ADMINISTRATION
NATIONAL CAPITAL REGION

NOVEMBER 1991

The following information is in response to the comments provided by the Advisory Council on Historic Preservation (ACHP) and the District of Columbia Historic Preservation Office (SHPO) in letters dated August 15, 1991.

BUILDING 187

No issue, the SHPO and the ACHP agree to the demolition of this building.

BUILDING 159E

No issue, the SHPO and the ACHP agree to the demolition of this building.

BUILDING 158

The SHPO and ACHP agree that "the re-use potential of this structure for office space is limited" and requests that GSA consider "rehabilitation for other uses such as retail or service space". The SHPO states that "if this is not possible, then the MOA should provide for HABS/HAER documentation and appropriate archeological treatment".

GSA RESPONSE:

GSA has identified 189,000 gross square feet of retail space for the SEFC to be housed in three renovated historic buildings (buildings 167, 170, and 173) and on the ground floor of new buildings lining an extended New Jersey Avenue and the urban square. In considering using building 158 for retail space the market potential for retail at the SEFC is the key factor.

According to the report, "Retail Potentials, Southeast Federal Center", prepared for the SEFC Master Plan by GA/Partners, the 23,000 Federal employees to be housed at the SEFC will support approximately 54 percent of the retail space. The remaining 46 percent will have to be supported by existing and planned office and residential development in the area.

Realizing the existing retail plan for the SEFC will be very challenging to achieve, it is not feasible to consider increasing the retail space identified for the site. If building 158 is to be used as a retail facility, the amount of retail space identified in the master plan for elsewhere on the site will have to be reduced.

GSA believes that using building 158 for retail space will serve no useful purpose. For example, if we relocate the retail now planned for buildings 167, 170, and 173 to building 158, this will result in the elimination of any feasible use for these buildings (given their size and shape, buildings 167, 170, and 173 are too small and inefficient for office development).

If we relocate the retail now planned for the ground floors of the buildings which will line New Jersey Avenue and the urban square to building 158, this will result in a decrease in street oriented retail, and, potentially, a decrease in street activity and interest. GSA believes that locating retail space along New Jersey Avenue and around the urban square will be an important means of connecting the rest of the city to the river. It will also help define the urban square as an important civic space. We believe street activity is essential in ensuring the success of the site.

Given these factors, GSA is not in favor of using building 158 as a retail facility. GSA agrees to provide HABS/HAER documentation of building 158 prior to its demolition and appropriate archeological treatment.

BUILDING 159

The SHPO and ACHP do "not believe the preservation analysis supports the demolition of this structure" and do not agree with the removal of building 159. Specifically, they do not find anything in the preservation report which "substantiates GSA's position that new construction, versus rehabilitation of Building 159, is the most viable option for this portion of the SEFC redevelopment plan".

GSA RESPONSE:

The SEFC Master Development Plan calls for the demolition of building 159 to allow for new construction at a higher density. Building 159 is located on parcel M as defined in the SEFC Master Plan (see Illustrative Site Plan, p. 42 of the SEFC Master Development Plan).

GSA has considered the SHPO's and ACHP's concerns regarding building 159 in light of the following issues:

- o The building's architectural integrity and efficiency;
- o The allocation of office space density across the site;
- o Loss of parking;
- o The retail proposed for the parcel in the Master Plan; and
- o The views of the Anacostia River along the New Jersey Avenue axis.

These issues are described below. Answers are provided to the specific questions asked by the ACHP following the analysis of issues.

A. ARCHITECTURAL INTEGRITY AND EFFICIENCY

The Historic Preservation Analysis and New Construction Building Program report states that building 159 is structurally sound and architecturally suitable for conversion to first class office space. However, the report goes on to state that "a large portion of the visible original building fabric has been removed". The chart, "Summary of Extant Historic Fabric", on page 32 of the preservation analysis identifies only five features of the building fabric which remain substantially in place:

- | | | |
|---|----------------------------|---------------|
| o | Roof structure | 95% in place |
| o | Roof structure, light well | 100% in place |
| o | Parapet | 100% in place |
| o | Exposed structural frame | 95% in place |
| o | Crane | 100% in place |

The corners of the parapet and the exposed structural frame are in poor condition.

On the other hand, nine features of the building have 20 percent or less of their fabric in place:

o	Roof membrane, light well	0% in place
o	Window frames	20% in place
o	Window operators	20% in place
o	Glazing	20% in place
o	Wall infill/panels	20% in place
o	Interior finishes and partitions	5% in place
o	Interior fixtures	0% in place
o	Production machinery	0% in place
o	Site fixtures and equipment	0% in place

Furthermore, while the building can be converted to office space, it will not be very efficient. As the building was constructed as a Machine Shop, it was built to house large, tall machinery. As a result, the slab to slab measurement for each floor is approximately 18 to 19 feet. This is significantly greater than usual office building slab to slab measurement (11 feet to 13 feet) and provides for an inefficient building in terms of volume.

As building 159 has lost a large portion of its original fabric and is inefficient in terms of conversion to office space, GSA does not believe it is appropriate to retain building 159 for renovation.

B. OFFICE SPACE ALLOCATION

1. TARGET DENSITY/FLEXIBLE DENSITY:

The SEFC Master Plan provides a "target" (average) office space density (in gross square feet) for each parcel or block on the site consistent with the overall objectives and concepts contained in the Master Plan. The target densities represent the preferred (ideal) allocation of 5,635,000 gross square feet of office space across the site. In developing these target densities, GSA's consultants, Keyes Condon Florance, Architects (KCF), considered height limitations, massing issues, open space requirements, historic structures, and overall space needs.

KCF also considered the fact that GSA will be constructing built-to-suit office buildings to meet the needs of specific Federal headquarters agencies (rather than "speculative" office buildings). Built-to-suit office buildings require that building envelopes have some flexibility to meet specific tenant needs as agency space requirements may not always match the target density identified for a parcel.

To accommodate this very real issue KCF provided for "flexible density ranges". Specifically, the Master Plan provides for limited transfer of density from one parcel to another (within identified maximum and minimum ranges) to allow for GSA to meet the specific needs of potential tenant agencies.

While these ranges are essential to allow GSA to satisfy Federal agencies' requirements, GSA's policy is to always attempt to match agency requirements with the target or ideal densities identified in the Master Plan. We are interested in keeping "transfer of density" from one parcel to another to a minimum to ensure the concepts KCF considered in developing the Master Plan are respected.

2. ASSUMPTIONS FOR THE PRESERVATION ANALYSIS:

When we developed the assumptions for the Historic Preservation Analysis and New Construction Building Program for Buildings 158, 159, 159E, and 187 in 1989, we concluded, in keeping with the policy stated above, that the "flexible density ranges" should NOT be used to accommodate any loss of density created by the renovation scenarios for buildings 159, 159E, 158 or 187. This limits the flexible density provision to be used ONLY for the purpose for which it was created: to help "best fit" tenant agencies' specific space requirements to the individual development parcels on the site.

Given this, GSA firmly believes the assumption to replace any loss of density associated with the renovation scenarios off-site is correct.

3. LOSS OF DENSITY DUE TO RENOVATION OF BUILDING 159:

The renovation of building 159 will result in a loss of 269,000 GSF of office space which could house 1,098 Federal employees. This reduces the economic benefits associated with the development of the SEFC as fewer Federal employees can be housed on the site in government owned space. The space calculations are provided below:

Building 159 (renovated):	351,000 GSF of office space (1,433 employees)
New construction at target (ideal) density on parcel M:	620,000 GSF of office space (2,525 employees)
Difference:	269,000 GSF of office space (1,098 employees)

We did look at whether we could recapture some of this lost density by adding onto the the height of building 159. However, the height of building 159 is approximately 95 feet. The Master Plan identifies a height limit for parcel M to range from 60 to 90 feet. Therefore, it is not possible to add any height to the building and stay within the height limits. (Four stories would have to be added to compensate for the lost density).

C. LOSS OF PARKING

The preservation report specifies that parcel M can contain 709 underground parking spaces to accommodate the parking requirements of the employees housed on parcel M. According to the Master Plan, parcel M can accommodate 620,000 GSF of office space for 2,525 employees at the target density. This density requires 601 parking spaces (based on the parking ratio of one parking space for every 4.2 employees).

The remaining parking spaces (108) are to be used to accommodate some of the tenants to be housed in building 160. A renovated building 160 can accommodate approximately 164,000 GSF of office space for 669 employees. This would result in a requirement of 159 parking spaces (based on the parking ratio of one space for every 4.2 employees). The 709 spaces will meet all of the parking needs for the employees located on parcel M and provide 108 of the 159 spaces needed for the employees housed in building 160.

The retention of building 159 would reduce the parking spaces required for the employees on parcel M from 601 spaces to 341 spaces (again, based on the parking ratio of one space for every 4.2 employees). The 108 spaces for the tenants of building 160 would still be required. All together 449 parking spaces would be needed under the renovation scenario to accommodate the employees in buildings 159 and 160.

Retaining building 159 will make it infeasible to construct any of underground parking spaces associated with buildings 159 and 160 on parcel M. Therefore, the 449 parking spaces identified above would need to be accommodated elsewhere on the site requiring a third level of parking to be constructed. GSA estimates that constructing a third level of parking below ground will increase costs by approximately 20 percent per space.

Also, the retention of building 159 is likely to increase traffic congestion on the site, and, perhaps, along M Street, SE since it will result in fewer parking garages. Each garage will be required to accommodate more cars.

To conclude, the renovation of building 159 will either result in the net loss of parking for 449 employees or increased unit costs to GSA to construct a third level of parking below ground.

D. RETAIL IN BUILDING 159

The SEFC Master Plan identifies 41,100 GSF of retail for parcel M (note that this is in addition to the 620,000 GSF of office space identified for this parcel). This retail is an important component of the plan as it will connect various public spaces (the Metro station entrance, the urban square and the riverfront park) and will encourage street activity (see response re: Building 158).

Housing retail in a renovated building 159 will decrease the available space for office use from 351,000 GSF to 309,900 GSF. This will exacerbate the loss of density issue described in section B.3.

E. VIEWS OF THE ANACOSTIA RIVER

The National Capital Planning Commission (NCPC) has requested GSA to revise the final draft SEFC Master Development Plan with respect to parcel M "with the objective of providing views of the Anacostia River along the partially interrupted New Jersey Avenue axis". To accomplish this, it is possible to change the footprint of the new construction planned for parcel M to open up the view corridor. This new footprint would be illustrated in the final SEFC Master Development Plan.

Furthermore, in comparing the footprint of building 159 with the footprint of the new construction (as shown in the final draft Master Development Plan) it is clear that building 159 also interferes with the view corridor. Essentially, building 159 is located as far west and south as the new construction footprint shown in the final draft version of the plan (see attached map).

Both the new construction scenario presented in the final draft Master Plan and building 159 block the view down New Jersey Avenue. However, while the footprint of the new construction planned for parcel M can be shifted to open up the view corridors, building 159 cannot be moved to enhance the views. GSA is also willing to explore the opening up the views down 3rd Street, SE. Given this, GSA believes that new construction on parcel M would better meet the objective of opening up the views to the Anacostia River and towards the Capitol than would retaining building 159.

Finally, in its comments to GSA, the ACHP raised two specific questions. These are responded to below:

1. QUESTION: If building 159 is demolished, what effect will its removal have on the "Industrial Character Zone" specified in the Master Plan?

RESPONSE: According to the Master Plan parcel M is located in the Industrial Character Zone. Within this zone, new office structures will be "designed to be in keeping with the linear, massive, and utilitarian nature of an industrial site". GSA created the concept of the Industrial Character Zone to enhance the site while redeveloping it to meet the Federal government's need for first class, cost effective, efficient office space.

We believe the SEFC Master Plan, as it stands, achieves this objective. Industrial character can be created in a new building as effectively as retaining it in an existing building, especially when a large portion of the original historic fabric has already been removed from the existing building (as in the case of building 159).

2. QUESTION: Will a new building on the site of building 159 interrupt the planned vistas along an extended New Jersey Avenue to the Anacostia? In the alternative, will the rehabilitation of building 159 interrupt these same vistas?

RESPONSE: See section "E" above.