

# STAFF RECOMMENDATION

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NCPC File No. MP211



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## DRAFT MASTER PLAN FOR DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS WEST CAMPUS

2700 Martin Luther King, Jr. Ave, SE  
Washington, D.C.

Submitted by the General Services Administration

October 25, 2007

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### Abstract

The General Services Administration (GSA) has submitted a Draft Master Plan for the St. Elizabeths West Campus located on Martin Luther King Jr. Ave, SE. The Master Plan will guide redevelopment of the West Campus of St. Elizabeths as the consolidated headquarters for the Department of Homeland Security (DHS). GSA intends to provide a secure federal campus with approximately 4.5 million gross square feet of office space and 1.8 million gross square feet of parking to house approximately 14,000 of the 26,000 DHS employees in the National Capital Region. DHS would relocate a variety of its component agencies to the site, beginning with the United States Coast Guard. GSA has submitted the Draft Master Plan for the St. Elizabeths West Campus to elicit comments and direction from the Commission in the development of the Final Master Plan, which GSA anticipates submitting for NCPC review early next year.

### Commission Actions Requested by Applicant

Approval of comments on the Draft Master Plan for the St. Elizabeths West Campus, pursuant to 40 U.S.C. § 8722 (b)(1) and (d).

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### Executive Director's Recommendation

The Commission:

**Acknowledges** that the Draft Master Plan calls for the comprehensive modernization of the infrastructure on the National Historic Landmark campus and for many of the historic buildings to be rehabilitated and occupied, even as some of the historic buildings would be demolished and much of the landscape character would be lost to new construction and an altered campus composition.

**Notes** that GSA has determined in its Draft Environmental Impact Statement (DEIS, dated September 28, 2007) that the proposed program in the St. Elizabeths Draft Master Plan would have “major, direct, long-term, adverse impacts” as well as “adverse effects” to the National Historic Landmark campus. These are due primarily to the size and nature of the construction program; the loss of historic buildings and the landscaped setting of the campus; altered or obstructed view sheds to, from, and within the campus; increased traffic in the neighborhood; and required modifications to the regional transportation and utility systems that would also result in physical alterations both on the campus and in the surrounding areas.

**Prefers** several design elements of Alternative 4 over Alternative 3, because the overall scheme has a lesser impact to the historic landscape around the Center Building and the oldest structures on the site. However, additional information with regard to access and site screening (particularly along the west edge of the site) is required to more fully evaluate the merits and impacts of each alternative, and to state a final preference for either one. The proposed alterations to the Center Building to facilitate its re-use for office space are also needed to fully evaluate Alternative 4.

**Requires** that GSA modify the Master Plan to mitigate or minimize the major, long-term, adverse impacts to the West Campus of St. Elizabeths. The following measures are consistent with NCPC’s Comprehensive Plan for the National Capital (Comprehensive Plan), GSA’s mission and goals for this project, as well as the purpose and need identified in the DEIS:

### **View Sheds**

The views of the campus from within the topographic bowl, the Anacostia and Potomac Rivers, and the immediate area would be significantly compromised by the height, massing and location of proposed buildings.

- Reduce the visual impact of the United States Coast Guard building by modifying its massing, siting, and monolithic appearance.
- Relocate some or all of the parking structures off-campus or below the existing grade to remove them from the view shed of the topographic bowl; and analyze shared parking opportunities on the East Campus, in Historic Anacostia, and at the Anacostia and/or Congress Heights Metro Stations.
- Use landscaping and vegetation (i.e. on roofs and surrounding buildings) to minimize the appearance of all structures in the view shed.
- Relocate the delivery screening facility on-site so that it is not visible from the Point and it is out of the view shed of the topographic bowl, or reduce the scale of the building and depress it further into the slope.
- Use a lower floor-to-floor height for new construction (i.e. 10’-8”, as is common in the downtown area) to reduce overall building heights.
- Minimize the effects of clear cutting and night lighting associated with the proposed perimeter fence to preserve the green slopes.

### **Transportation**

The consolidation of the Department of Homeland Security at the St. Elizabeths Campus would introduce approximately 14,000 daily employees to the campus, bearing a significant impact on the existing landscape, neighborhoods streets, and regional transportation systems.

- Taking into account that 90% of employees would work during standard business hours, develop a Transportation Management Plan that conforms to the Transportation policies of NCPC's Comprehensive Plan for the National Capital:
  - Meet the Comprehensive Plan goal for a parking ratio of 1 space per 4 employees to address the documented impacts of increased air pollution and traffic congestion, and take advantage of the site's proximity to public transportation.
  - Identify and support alternative modes of travel using subsidies for public transportation, shuttle buses to and from nearby Metro stations, and other incentive programs.
  - Complete the section of the Proposed Fort Circle Parks Trail within the Project Area (from Fort Greble to Stanton Road) to provide a route for cyclists to and from the campus.
  - Identify anticipated impacts to the transportation level of service during heightened security.
  - Work with the District of Columbia, National Park Service, and other Consulting Parties to analyze additional and/or alternative means of accessing the campus via Suitland Parkway (under the jurisdiction of the District Department of Transportation) to accommodate off-campus parking structures.
- Designate Gate 2, rather than Gate 1, as the primary access point from Martin Luther King Jr. Ave. to minimize impacts to the original section of the campus as well as the view shed radiating from the Gate 1 point of entry. Maintain the original use of Gate 1 for the historic and/or ceremonial entrance to the campus.

### **Community Benefits**

Locating the Department of Homeland Security headquarters at St. Elizabeths would create the potential for economic development beyond the campus walls that would be a catalyst for Ward 8 and provide citywide benefits. Implement the following to stimulate neighborhood growth and economic opportunities in the surrounding communities:

- Propose alternative parking solutions outside the secure campus to encourage employee patronage of businesses along Martin Luther King Jr. Ave. and in Historic Anacostia. Analyze shared parking opportunities on the East Campus, in Historic Anacostia, and at the Anacostia and/or Congress Heights Metro Stations.
- Work with the District Department of Transportation to coordinate streetscape improvements along Martin Luther King Jr. Ave. to improve the pedestrian experience into Historic Anacostia.
- Develop a shuttle system between the campus and the Anacostia and/or Congress Heights Metro Stations to promote integration of the DHS workforce into the surrounding communities and to promote patronizing of local businesses.
- Locate support facilities (e.g., fitness center, child care center, barber shop, etc.) off-site to encourage integration of the DHS workforce into the surrounding neighborhood and also to provide business and employment opportunities to local residents.
- Build the section of the Proposed Fort Circle Parks Trail within the Project Area (from Fort Greble to Stanton Road) to provide a recreational amenity for both employees and community members.
- Identify vehicular and pedestrian access to the Cemetery.
- Identify specific opportunities and means for the public to access the Point.

### **Historic Preservation – Buildings and Landscape**

The National Historic Landmark (NHL) designation for St. Elizabeths documented and established the national significance of the hospital campus for its history and association with pioneering treatment for the mentally ill, its architecture, and its designed therapeutic landscape. The significance of its setting is due in part to its siting on the bluffs of the Anacostia Hills above Washington.

GSA and NCPC have a statutory requirement under Section 110(f) of the National Historic Preservation Act to “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” GSA has determined that the proposed 6.3 million square-foot program would have an adverse effect on the significant historical, architectural, landscape, and spatial qualities of the site.

To conclude the Section 106 process and comply with Section 110(f), achieve the following:

- Modify building square footage, building footprints, and massing to be more compatible with the historic buildings, historic landscape, and the campus setting.
- Continue Section 106 consultation in order to develop a Programmatic Agreement that will respond to and resolve the adverse effects.
- Develop a Historic Preservation Plan and Cultural Landscape Report to identify the required treatments to appropriately preserve and rehabilitate the historic buildings and the historic landscape.
- Rehabilitate the historic buildings and historic landscape according to the *Secretary of the Interior’s Standard’s for the Treatment of Historic Properties*.
- Develop Design Guidelines for new construction aimed to minimize harm to the historic buildings and their setting.
- Plan and document construction and staging impacts to avoid damage to and loss of historic buildings and landscape features.

### **Environmental Sustainability**

The proposed environmental activities included in the Master Plan seek to incorporate a variety of innovative environmental technologies into the development and to achieve a Silver LEED rating. As the plan is further developed, the applicant is encouraged to use innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice.

Include in the Final Master Plan:

- Mitigation for the loss of tree canopy and habitat on-site.
- Planning for stormwater management / low impact development techniques such as bioswales, green roofs, and retention wells to manage stormwater on site. Also indicate how stormwater quantity and quality would be managed during construction.
- Planning for hazardous materials abatement and waste disposal, construction materials selection, energy sources and emissions.

**Requires** that GSA include the following information prior to the Final Master Plan submission:

- A detailed analysis of the relationship of the Master Plan to the Federal and District Elements of the Comprehensive Plan for the National Capital.
- A *Transportation Management Plan* that implements a 1:4 parking ratio and identifies transportation improvement projects needed to serve future population levels and anticipated growth; establishes staffing and operation of transportation demand management programs; and outlines the resources needed to fund the improvements and maintenance expenses.
- Additional *View Shed Analysis* of the impacts of campus development on views from the site, particularly views within the historic campus and those to the north and west.
- An *Historic Preservation Plan* and a *Cultural Landscape Report* that discusses the significance, treatment, and ongoing preservation of the historic buildings and landscape.
- A *Discussion of the Anticipated Economic Impacts and Opportunities* that the proposed project will have on the community.
- A *Summary of Public Access Provisions* that outlines how the public would be able to access the Cemetery and the specific times when the public would be permitted to access the Point.
- A *Stormwater Management Plan* that describes the amount, location and process in which stormwater would be managed on-site.
- A *Tree Removal and Replacement Plan* that illustrates which trees would need to be removed and where they would be replaced on-site.
- A *Construction Staging Plan* that describes the timing, location, and impacts of construction staging areas.

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## PROJECT DESCRIPTION

### Background

The history of the site's use as St. Elizabeths Hospital began in 1852, when Dorothea Dix, the advocate of modern treatment of the mentally ill, persuaded Congress to appropriate \$100,000 to build a model hospital for the treatment of the insane in Washington, DC. The site became a landmark institution in the mid-nineteenth century reform movement that sought to provide care for the mentally ill through the therapeutic qualities of the institution's physical design and therapeutic environment.

The Secretary of the Interior designated St. Elizabeths a National Historic Landmark in 1991 for the national significance of the site and its exceptional value in illustrating the history of the United States. St. Elizabeths represents important nineteenth and twentieth century social and humanitarian movements associated with the advance of mental health care. It is associated with nationally significant leaders in the treatment of mental illness such as Dorothea Dix and Dr. Charles Nichols. St. Elizabeths is also significant for its historic landscape features and collection of Collegiate Gothic, Italianate, and Renaissance Revival architecture.

The U.S. Department of Health and Human Services and its predecessors controlled and operated St. Elizabeths from its founding in 1852 until 2004. In 1987, the federal government transferred the East Campus to the District of Columbia, which continues to operate a hospital on that site. The West Campus hospital was in use until the early 1990s. At the time of its closure, all of the patients were moved from the West Campus to the East Campus. In January of 2001, the U.S. Department of Health and Human Services determined that the agency no longer had a

need for the West Campus and declared the property “excess.” GSA took custody and control of the campus in December of 2004; buildings on the West Campus are currently vacant.

The Draft Master Plan process to develop the West Campus involves the client, GSA; the tenant, the US Department of Homeland Security (DHS) including the US Coast Guard (USCG); the design team; officials from local and federal agencies; the Section 106 Consulting Parties, made up of local and national organizations; and representatives of the local community. GSA has made public presentations and participated in public meetings to provide periodic updates, outline issues, and solicit support. These included meetings with local Advisory Neighborhood Commissions (ANCs), the general public, and the Consulting Parties under the Section 106 process. The plan is being developed concurrently with the National Environmental Policy Act Environmental Impact Statement (NEPA EIS) and National Historic Preservation Act (NHPA) Section 106 processes.

Faced with the need to consolidate 22 separate agencies among several locations into the recently formed Department of Homeland Security (DHS), DHS and GSA determined that the St. Elizabeths Campus would meet their goal of a secure federal campus. By consolidating executive program leadership in a secure setting, DHS aims to optimize their prevention and response capabilities while fostering a “one-DHS” culture among the relatively young agency components. The Master Plan for the West Campus sets up the framework for a total development of 4.5 million gross square feet distributed to existing historic buildings and to new construction on the campus, and an additional 1.8 million square feet of parking.

The goals of the St. Elizabeths West Campus Master Plan are as follows:

- Achieve the maximum build-out of the site for federal use, while maintaining the historic character of the West Campus;
- Provide a world-class federal workplace planned and designed by the nation’s leading architects;
- Use federal development in ways that consider community development goals and efforts;
- Satisfy federal security requirements in a manner that remains sensitive to neighboring communities;
- Preserve, to a practicable extent, the natural context of the site;
- Promote sustainable development by achieving a “Silver” Leadership in Energy and Environmental Design (LEED) rating;
- Facilitate an open and inclusive process;
- Improve transportation access to the campus; and
- Optimize the federal investment.

### The Site

The St. Elizabeths West Campus is located at 2700 Martin Luther King, Jr. Avenue in Southeast Washington DC. It is situated in the Congress Heights community and overlooks Interstate 295, Bolling Air Force Base, the Anacostia Naval Annex, and the Anacostia River. The 176-acre site, situated 1.5 miles southeast of the U.S. Capitol, is bounded by Martin Luther King, Jr. Avenue to the east, I-295 to the west, the Barry Farm dwellings to the north, and Shepherd Parkway and Congress Heights to the south (Figure 1).

All major vehicular access routes leading to the vicinity of St. Elizabeths connect to either the Suitland Parkway or Malcolm X Avenue. Public transportation services to/from the site include the Anacostia and Congress Heights Metrorail stations (both within a one mile radius) and several bus lines that run along the Martin Luther King Jr. Avenue corridor.

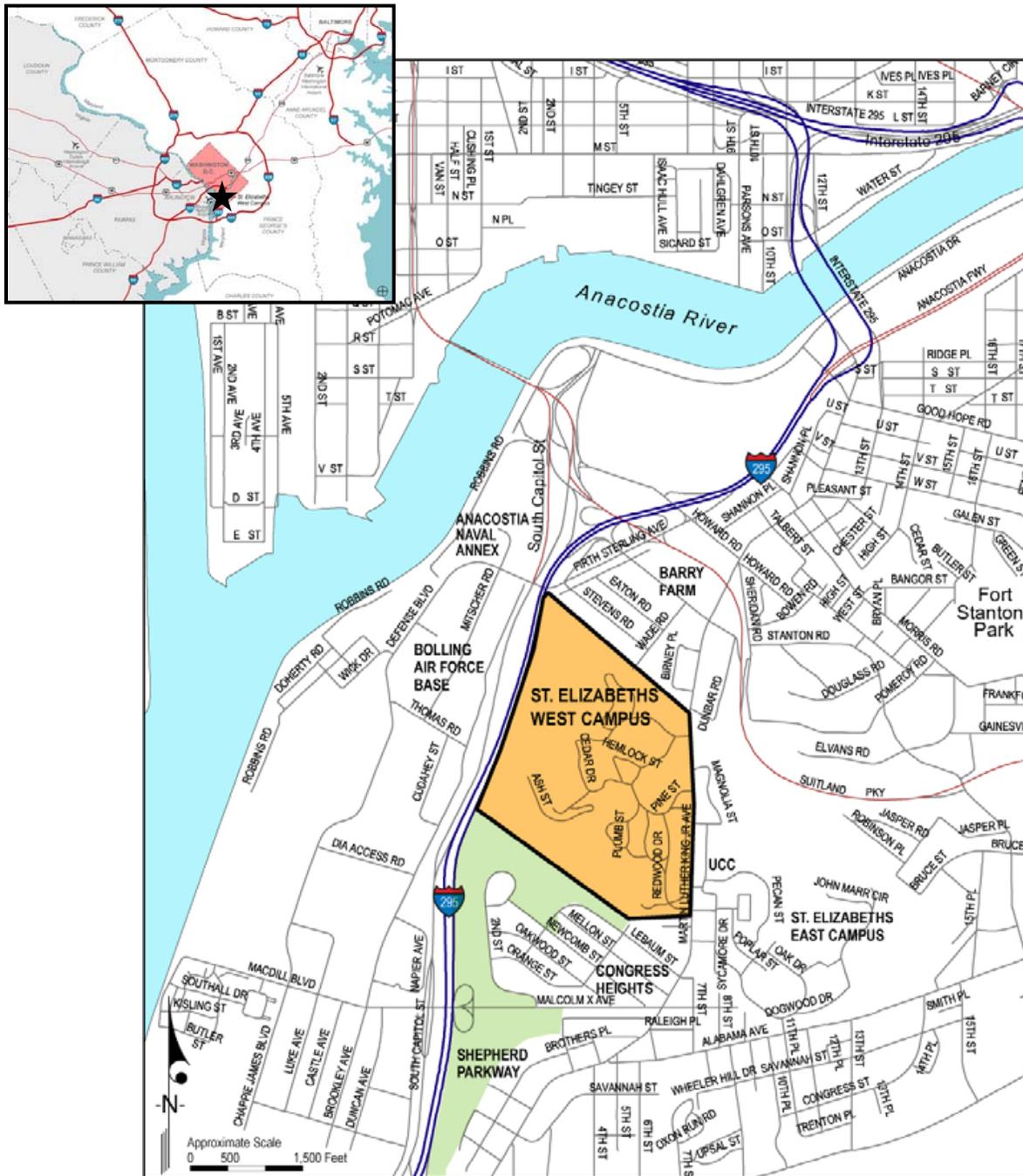
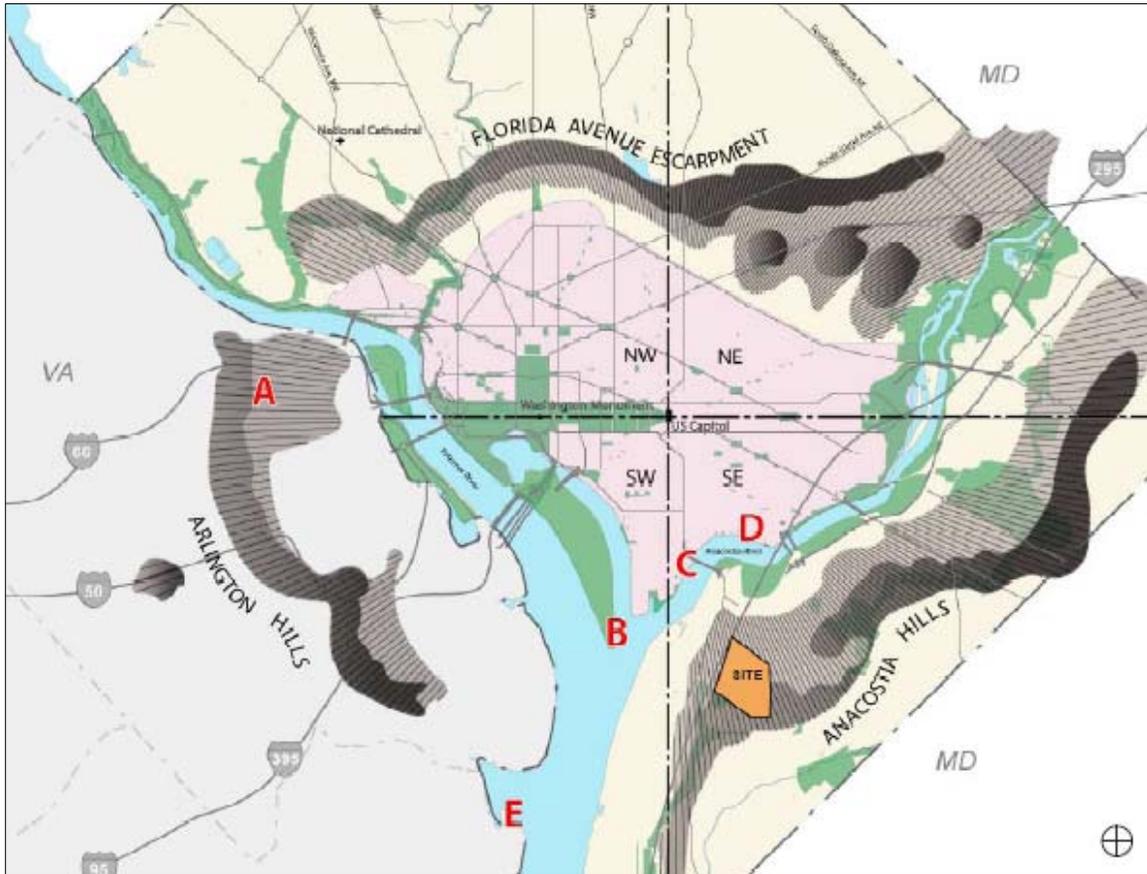


Figure 1: Context Map

The East Campus, owned and operated by the District of Columbia, is located across Martin Luther King, Jr. Avenue, and currently houses the St. Elizabeths Hospital and the District of Columbia Unified Communications Center. Future plans for the East Campus include mixed-use development that will include retail and housing uses.

The St. Elizabeths West Campus is part of the green, open space rim of the topographic bowl (Figure 2) – the bluffs that surround the L’Enfant-planned capital city and can be seen from prominent locations in and around the city. The topography of the campus is characterized by a generally flat, upper-level plateau with adjacent steep slopes and ravines to the west and north. As a result, the site offers panoramic views of the Anacostia and Potomac Rivers and of Washington DC and the Virginia shore.



**Figure 2: Topographic Bowl**

While the campus has been vacant for several years, the buildings and many landscape features still remain largely intact. There are currently 70 existing buildings located on the St. Elizabeths West Campus, 62 of which are identified as contributing to the National Historic Landmark. In all, the total building area is approximately 1.1 million gross square feet.

The project area for the St. Elizabeths West Campus Plan (Figure 3) currently includes the West Campus and Shepherd Parkway (National Park Service property), through which GSA proposes to build a new access road to the campus.

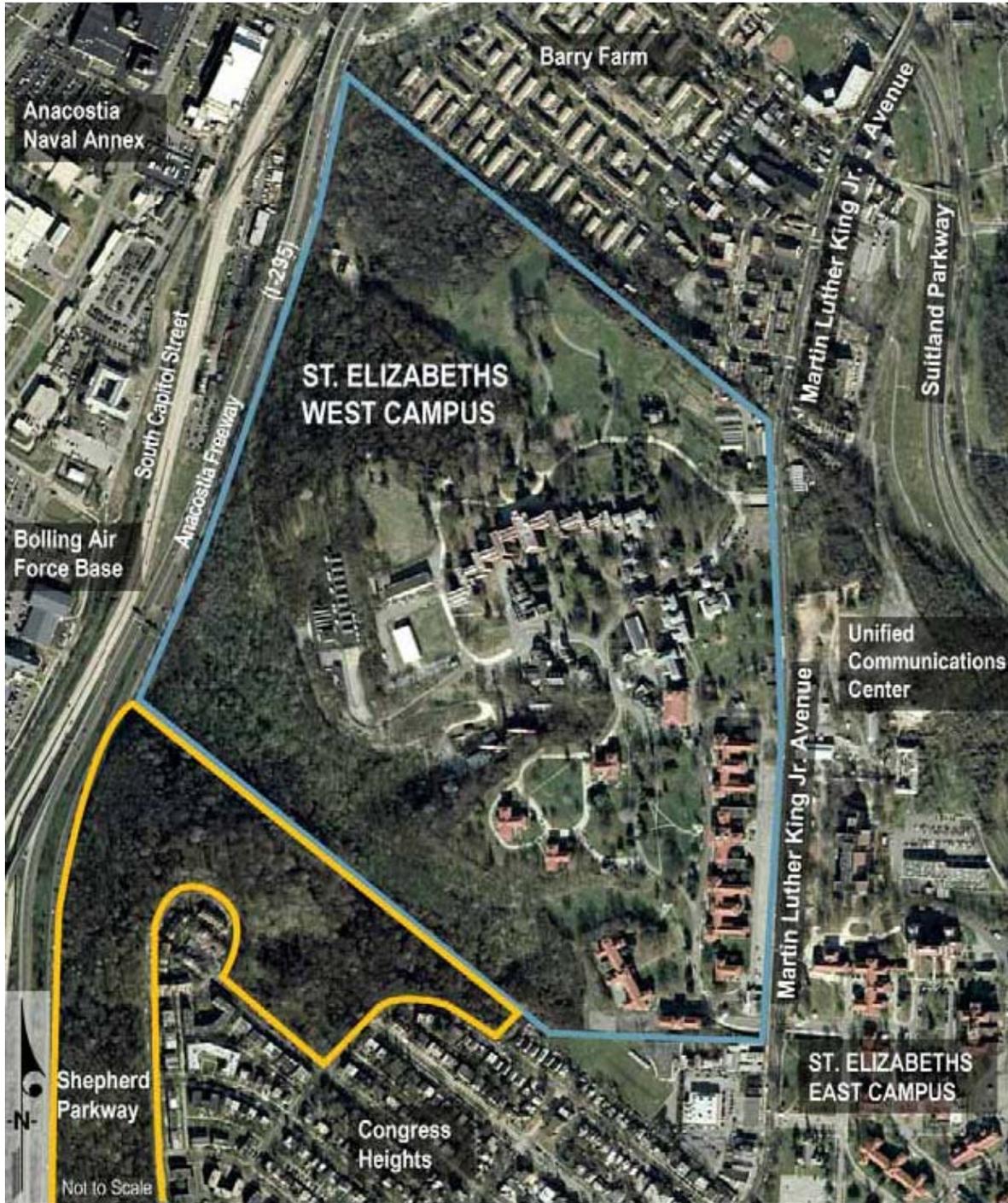


Figure 3: Project Area

### Program Requirements

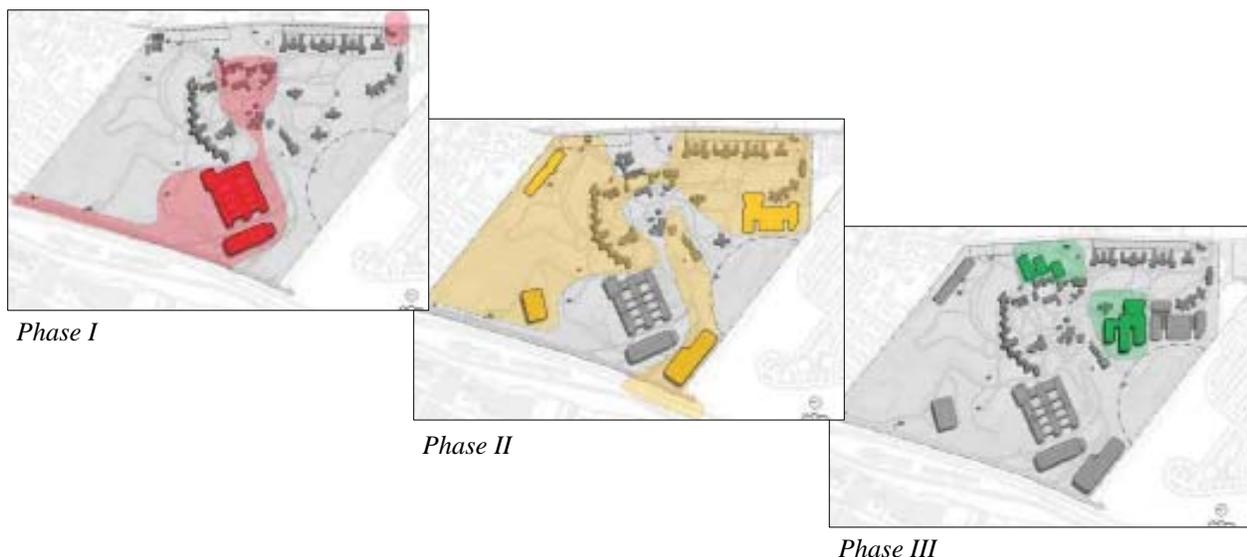
The Department of Homeland Security (DHS) has a programmatic need to consolidate and house on a secure federal campus the critical elements of its headquarters and five constituent components: the Transportation Security Administration (TSA), Customs and Border Protection (CBP), Immigration and Customs Enforcement (ICE), the Federal Emergency Management Administration (FEMA), and the United States Coast Guard (USCG). The total space program for these combined elements amounts to approximately 4.5 million gross square feet of office space; the Draft Master Plan also proposes 5,307 on-campus parking spaces accounting for an additional 1,857,460 gross square feet.

The total proposed development program for the site including parking is 6.3 million gross square feet (gsf):

- 3,586,000 gsf of office space for the critical elements of DHS
- 275,500 gsf for systems support space for all utility infrastructure
- 390,000 gsf for the National Operations Center and related screening facilities.
- 300,950 gsf for employee services and amenities (i.e. childcare, bank, food services, etc.)
- 1,800,000 gsf for employee and visitor parking

The new facility is expected to house approximately 14,000 DHS employees, and an additional 250 support staff to maintain the physical plant and the various shared use functions common to all of the agencies. Standard hours (generally, 9:00 am to 5:00 pm) would be worked by approximately 90% of the workforce, but a Level V secure environment would be maintained at all times.

The Master Plan is expected to be implemented with a three-phase development plan (Figure 4) lasting a period of 5 to 12 years. The first phase of construction, planned to commence in 2008, would include all the necessary functional space and infrastructure improvements to fully support the USCG, the first DHS component on site. The second phase of development would establish the DHS and FEMA headquarters. The final phase of development would establish the headquarters for TSA, CBP and ICE.



**Figure 4: Phasing Plan**

## PROPOSAL

The General Services Administration has submitted a Draft Master Plan for the St. Elizabeths West Campus to solicit comments on the preferred alternatives and get additional direction from the Commission. The plan is being developed concurrently with, and is informed by, the National Environmental Policy Act Environmental Impact Statement (NEPA EIS) and National Historic Preservation Act (NHPA) Section 106 process.

NCPC staff will comment in mid-November on the Draft EIS (currently under review and released for public comment), and will continue to participate in the Section 106 review process.

### *Planning Principles*

In response to site analysis, the design team developed the following planning principles that form the basis of and guide the development of the Master Plan:

1. Retain, preserve and enhance site elements and spaces that define the existing site character.
2. Locate new development density on site to respect the character of and relationship between the historic resources
3. Organize programmatic elements on site to maximize operational efficiency and effectiveness.
4. Protect, preserve and reuse the historic resources of the National Historic Landmark.
5. Integrate historic landscape and natural features into the Master Plan.
6. Maintain and enhance historic views from and within the site, as well as valuable non-historic views from outside the site.
7. Respect and reinforce the historic address for the site on Martin Luther King Jr. Avenue
8. Use historic roadways and paths to reinforce spatial continuity.
9. Locate parking at the site perimeter to preserve the pedestrian-oriented site, consistent with historic precedent.
10. Develop landscape responses that respect the inherent distinction between the different zones of the site.
11. Centralize site utilities for security, redundancy and operational efficiency.
12. Assure the safety and security of the site's occupants and activities while maintaining an appearance to the site that is open, accessible and a good neighbor.

With the existing conditions information, program information from DHS and the framework of the planning principles, a number of concept alternatives were developed by the design team. These alternatives were tested against program, functional organization, and impact to the historic and cultural resources of the NHL. Three-dimensional massing models of the alternatives were created in order to test views from the neighboring community, larger city, and within the campus. The various alternatives were revised and refined, resulting in four alternatives that are currently being analyzed in the NEPA Draft Environmental Impact Statement. GSA has stated that it will continue to consider the preferred alternatives as well as any other reasonable alternatives identified during the NEPA public review process and Section 106 consultation until it selects one alternative through issuance of a Record of Decision.

### *The Alternatives*

Of the four alternatives included in the Draft Environmental Impact Statement, GSA has identified two as preferred alternatives for developing secure office space in the District of Columbia for DHS. Although both preferred alternatives include development of approximately 4.5 million gross square feet of office and support space, they vary in density distribution and impacts.



**Figure 5: Preferred Alternative 3**

### ***ALTERNATIVE 3***

- 4.5 million gsf office/ support space + 1.8 million gsf parking
- High density development area on west edge of south quad
- Large structure on west edge (Warehouse site) for USCG HQ
- Large parking structures on west edge; limited below grade parking adjacent to wall along MLK Blvd.
- Most efficient for DHS operations
- Medium density development on north (original) section of campus, eliminating significant historic open space in front of Center Building



**Figure 6: Preferred Alternative 4**

### ***ALTERNATIVE 4***

- 4.5 million gsf office/support space + 1.9 million gsf parking
- High density development area on west edge of south campus
- Large structure on west edge (Warehouse site) for USCG HQ
- Large parking structures on west edge; limited below grade parking adjacent to wall along MLK Blvd.
- Requires modifications to Center Building to improve circulation – methods yet unknown
- “Preservation zone” on north (original) section of campus and south quad, preserving significant historic open space – in response to Consulting Party historic preservation concerns

According to the Draft Master Plan, Alternative 3 (Figure 5) more efficiently supports the programmatic requirements of DHS which include: space, adjacencies, and functionality of the adaptively reused historic buildings while including steps to minimize harm to the historic qualities of the site; Alternative 4 (Figure 6), offered as a response to historic preservation concerns raised by Consulting Parties, attempts to minimize harm to the historic qualities of the site, including the creation of a preservation area in the central historic core of the campus. The nature and extent of Center Building modifications that are necessary to deliver adequate circulation, security, and other programmatic requirements as part of this alternative remain under consideration.

The two preferred alternatives also include 1.8 million gross square feet of parking, with a single parking solution for both.

*Differences between Alternatives*

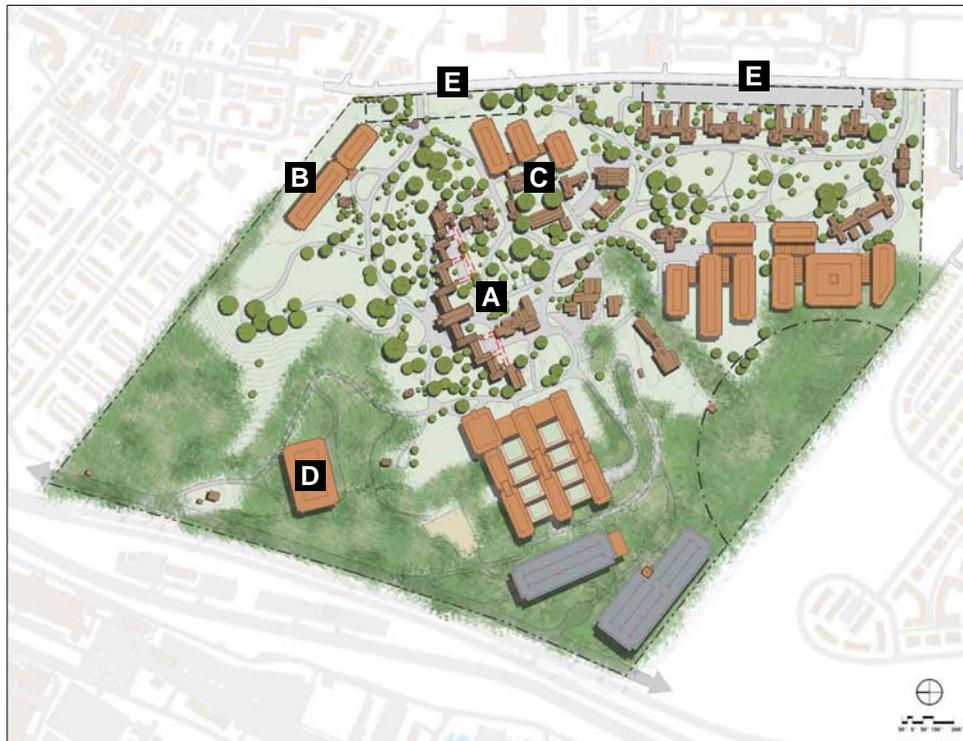
Alternatives 3 and 4 represent, on a continuum, differing masses behind the Center Building and the movement of those masses to various locations. The following chart and site plans (Figure 7) outline the primary distinctions between the two alternatives:

DIFFERENCES BETWEEN ALTERNATIVES			
Key*	Area / Alternative	Alternative 3	Alternative 4
<b>A</b>	<b>Center Building</b>	Four 3-story buildings attached to the south side of the Center Building and separated by courtyards (264,000 GSF)	Retains existing buildings southeast/southwest of the Center Building  Preserves open space directly south of the Center Building
<b>B</b>	<b>Greenhouse Site (northwest corner)</b>	No new construction above grade; demolish greenhouses	New 4-story building on site (262,000 GSF); demolish greenhouses
<b>C</b>	<b>Allison Site (near Gate 1)</b>	Four 3-story buildings (270,000 GSF)	Two 4-story buildings and One 5-story building (312,000 GSF)
<b>D</b>	<b>Screening Facility (interchangeable)</b>	Screening area above grade	Screening area below grade
<b>E</b>	<b>Parking Along MLK Ave.</b>	Multi-level sub-grade facility along northern boundary  Multi-level sub-grade facility between Gates 1 and 2	Multi-level sub-grade facility between Gates 1, 2 and 3

\* Refer to Figure 7 (next page) for corresponding site plans.



*Preferred Alternative 3*



*Preferred Alternative 4*

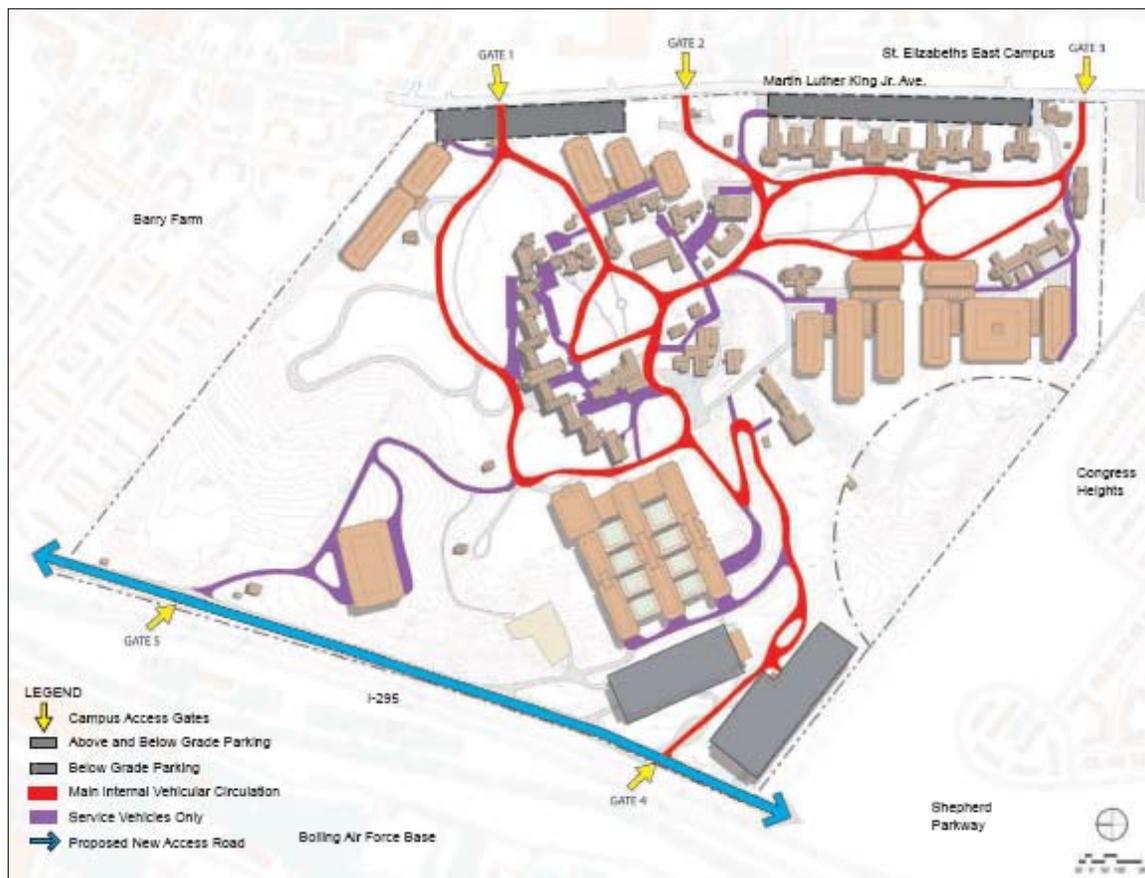
**Figure 7: Differences between Alternatives**

There are several areas that are common to both preferred alternatives, including the development approach to access and circulation, parking, and perimeter security:

### *Vehicular Access and Internal Circulation*

The existing regional transportation network does not provide adequate direct vehicular access to the St. Elizabeths campus, and significant modifications or additions to the roadways would be required to accommodate the projected traffic increase. Current automobile routes to the site are either from Interstate 295 or the Suitland Parkway, and then via local roads to the entrance on Martin Luther King Jr. Avenue. According to comments from the District of Columbia Department of Transportation (DDOT), the current roadways are already congested and planned community development in Ward 8 will seriously challenge the already congested corridor

The Draft Master Plan proposes retaining the MLK route for approximately 30% of arriving vehicles, including significant modifications to historic Gates 1 and 2 to accommodate increased vehicle usage, a shuttle drop-off area, as well as screening equipment. For the remaining 70% of arriving employee vehicles and truck deliveries, the Plan proposes creating a new access road along the western edge of the site to connect the Malcolm X exit ramp from Interstate 295 and Firth Sterling Avenue, leading to a new employee entrance (Gate 4) as well as a service/delivery entrance (Gate 5). The new access road would not be open to the public, but would allow for limited public access to the Cemetery (Figure 8).



**Figure 8: Access and Circulation / Parking**

Although a Transportation Management Plan has not yet been completed, it is important to note the anticipated arrival and departure statistics included in the Draft Master Plan. Approximately 36 percent of St. Elizabeths' employees would arrive at the campus during the AM peak hour of adjacent roadway traffic and approximately 25 percent of St. Elizabeths' employees would depart from the campus during the PM peak hour of adjacent roadway traffic. These peak hours are reflective of the traffic on the roadway network surrounding the St. Elizabeths West Campus and not the actual peak hours that the employees arrive to and depart from the campus.

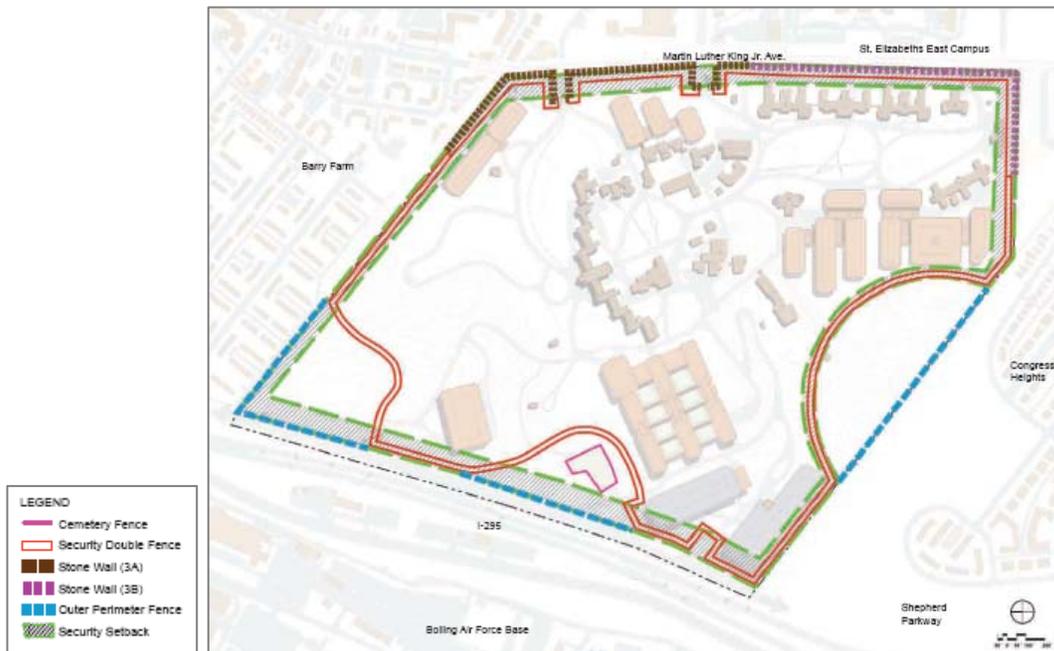
Internal circulation for both pedestrian and vehicular access would be achieved largely through preservation and rehabilitation of the historic pathways that are currently in place.

### *Parking*

Parking on the west campus would be limited to perimeter areas due to security, traffic, and historic preservation considerations (Figure 8). The parking space distribution on the east and west sides of the campus is based on traffic projections and available areas for the creation of garages. Thirty percent (30%) of vehicles entering the campus would park in the garages accessed by Gates 1 and 2 on the eastern edge of the site, while seventy percent (70%) would park in the garages accessed via Gate 4 on the western side of the site.

Based on a population of 14,000, the Plan provides one parking space for every three employees resulting in 4,667 spaces, plus an additional 640 visitor parking spaces; a total of 5,307 parking spaces are proposed. The remaining 67% of the employees would arrive to the campus via Metrorail, Metrobus, commuter buses, or carpools. Once parked and screened, employees and visitors would be able to access the campus on foot or via one of the internal shuttles that would regularly circulate around between buildings.

### *Perimeter Security*



**Figure 9: Perimeter Security**

Several security elements are envisioned for securing the campus perimeter and maintaining a site within (Figure 9). A double fence line is planned for the perimeter (except in very steep locations), vehicle barriers would be installed at entry points, each building would have its own secure entrance with screening area, and a delivery screening facility would be located near the site perimeter. Surveillance equipment and alarms would augment the physical barriers that would be used to secure the site.

## PROJECT ANALYSIS

GSA has determined in its Draft Environmental Impact Statement (DEIS, dated September 28, 2007) that the proposed program in the St. Elizabeths Draft Master Plan would have “major, direct, long-term, adverse impacts” as well as “adverse effects” to the National Historic Landmark campus. These are due primarily to the size and nature of the construction program; the loss of historic buildings and the landscaped setting of the campus; altered or obstructed view sheds to, from, and within the campus; increased traffic in the neighborhood; and required modifications to the regional transportation and utility systems that would also result in physical alterations both on the campus and in the surrounding areas.

Staff also acknowledges that the comprehensive modernization of the infrastructure on the National Historic Landmark campus, along with the introduction of new facilities required to meet the stated program requirements, would result in the rehabilitation of many of the historic buildings; and that some of the historic buildings would be demolished and much of the landscape character lost to an altered campus composition.

When evaluating the merits and impacts of both preferred alternatives (Alternative 3 and 4), Staff prefers several elements of Alternative 4 over Alternative 3, because the overall scheme has a lesser impact to the historic landscape around the Center Building and the oldest structures on the site. However, additional information with regard to access and site screening (particularly along the west edge of the site) is required to more fully evaluate the merits and impacts of each alternative, and to state a final preference for either one. The proposed alterations to the Center Building to facilitate its re-use for office space are also needed to fully evaluate Alternative 4; solutions such as skywalks on the south side of the building (as shown in the Alternative 4 site plan) are not viewed favorably by staff.

There are five primary impact categories that Staff has identified and evaluated as part of its review of the Draft Master Plan: View Sheds, Transportation, Community Benefits, Historic Preservation, and Environmental Sustainability. Accordingly, the following sections present Staff’s analysis of each and identifies measures (that are consistent with NCPC’s Comprehensive Plan for the National Capital (Comprehensive Plan), GSA’s mission and goals for this project, as well as the purpose and need identified in the DEIS) to minimize and/or mitigate the effects of some aspects of the proposed designs:

### View Sheds

Dorothea Dix and Charles Nichols chose the site for St. Elizabeths based on several critical factors, one of which was its position above the Potomac and Anacostia rivers that offered panoramic, therapeutic views of the rivers and of Washington, D.C. Views toward the rivers, Washington, and Virginia can be found at numerous locations throughout the campus, and the site provides innumerable opportunities for observation of natural and ornamental landscapes similar to those Dix and Nichols envisioned 150 years ago. The wooded ridge on which St. Elizabeths was built can also be seen from prominent locations in the city and suburbs (Figure 10). GSA and the Consulting Parties agree that views of St. Elizabeths are valuable for both historic and aesthetic reasons. Views evaluated in the Draft EIS will therefore not be limited to those documented in the HRMP.



**Figure 10: View Sheds**

The views of the campus from the topographic bowl, the Anacostia and Potomac Rivers, and the neighborhood would be significantly compromised by the height and massing of the proposed development program. The DEIS states that due to new construction, impacts to views would generally be, “major, direct, long-term, and adverse.” This applies to views to and from the Center Building, views from the lawn, views from Congress Heights Historic District, and views to and from the West Campus Cemetery.

Views to and from the Center Building receive direct, long-term, major, adverse effects from new construction on the southeast, south, and west. Security construction at gates 1 and 2 and new office construction severely compromise the entrance experience and remove the therapeutic and ornamental landscape east of the cottages. New construction in the area of the Allison Buildings would obstruct views from St. Elizabeths’ East Campus, and new buildings near the Point would be visible from the surrounding neighborhood. Construction of a new large office

complex on the warehouse site would have direct, long-term, major, adverse effects on views from the Center Building to the west. New lighting and security cameras throughout the area around the Center Building could adversely affect views. The extent of these effects cannot be determined until the security, lighting, and camera plans are finalized.

The height and massing of the new buildings on the west side of the lawn near Buildings #60, #64, #66 through #69, #70, and #72 through #75 have direct, long-term, major adverse effects on views from the lawn; from buildings #69, #72, #73, #74, and #75; and from Redwood and Spruce drives. New lighting and security cameras throughout this area may adversely affect views.

The new buildings would also be visible from locations on St. Elizabeths' East Campus and in the Congress Heights Historic District, both of which are in the secondary area of potential effect (APE). Two satellite dishes and associated structures near the boiler house/ice plant and the bridge across the ravine near the powerhouse adversely affect views of the service landscape from the west. The extent of this effect cannot be determined until details of the bridge construction are available.

Much of St. Elizabeths' former agricultural land below the Point has yielded to woodland in the last few decades. The amount of new construction planned in this area (warehouse, access road, double fencing, lighting, cameras, gates, and security structures) would, however, have direct, long-term, major, adverse effects on views of the area from the north and west. This development, since it includes new construction on what had been a mostly open landscape, would also likely have adverse effects on views toward the Anacostia River and the monumental core of Washington from the Point, which include the slope below the plateau. The nature of the effects would depend on how well the woodland canopy in this area is maintained.

The proposed US Coast Guard facility, planned for Phase I of construction, requires careful attention due to its prominent location on the western slope of the escarpment. The schematic designs depicted in the Appendix, although not fully developed, do not respect the traditional building designs, materials, and context of the existing campus. The design of this facility should be less monolithic and should blend more into the surrounding landscape. The Design Guidelines that are developed as part of the ongoing Master Plan development should include items that specifically address such a large structure in this location.

The security fence, lighting, cameras, and new office construction west of the Center Building also have direct, long-term, major, adverse effects on the experience of the West Campus Cemetery. This construction, along with the office buildings west of the lawn near Buildings #60, #64, #66 through #69, #70, and #72 through #75 parking facilities and new access road near Interstate 295, has direct and indirect adverse effects on views of the campus from the west. The direct, long-term, major adverse effects occur along the approach from I-295. The nature of fencing associated with construction phases is unknown at this time but would potentially have direct adverse effects on views within the campus as long as the construction period lasts. The locations of electrical substations have not yet been determined.

## **Comprehensive Plan, Parks and Open Space Policies (excerpted, p. 115)**

### Terrain Features

*The Federal Government should:*

1. *Protect and enhance the region's unique terrain features, including the forested ridgelines of the topographic bowl surrounding the central city of Washington. Preserve the green setting of the Anacostia Hills and integrate building masses with, and subordinate to, the natural topography.*
2. *Ensure that development does not intrude through the ridge and tree lines of natural terrain areas unless it will not impact vistas to and from those areas.*
5. *The Commission's Guidelines for Antennas on Federal Property in the National Capital Region as well as the following:*
  - *Every effort should be made to avoid locating antennas and tower structures within the viewsheds of established natural and cultural landscapes and open spaces.*
  - *Innovative designs that reduce the visibility of antennas and towers in a natural setting should be encouraged. The use of compatible alternative tower structures that are similar in design or appearance to trees and other tall features may help to reduce the visual impact of these structures*

*Measures to minimize and/or mitigate the effects on View Sheds:*

- Reduce the visual impact of the United States Coast Guard building by modifying its massing, siting, and monolithic appearance.
- Relocate some or all of the parking structures off-campus or below the existing grade to remove them from the view shed of the topographic bowl; and analyze shared parking opportunities on the East Campus, in Historic Anacostia, and at the Anacostia and/or Congress Heights Metro Stations.
- Use landscaping and vegetation (i.e. on roofs and surrounding buildings) to minimize the appearance of all structures in the view shed.
- Relocate the delivery screening facility on-site so that it is not visible from the Point and it is out of the view shed of the topographic bowl, or reduce the scale of the building and depress it further into the slope.
- Use a lower floor-to-floor height for new construction (i.e. 10'-8", as is common in the downtown area) to reduce overall building heights.
- Minimize the effects of clear cutting and night lighting associated with the proposed perimeter fence to preserve the green slopes.

### **Transportation**

The consolidation of the Department of Homeland Security at the St. Elizabeths Campus would introduce approximately 14,000 daily employees to the campus, bearing a significant impact on the existing landscape, neighborhoods streets, and regional transportation systems.

#### *Transportation Management Plan*

While the Draft Master Plan provides an overview of access, circulation, and parking, the applicant is required per the Comprehensive Plan to submit a Transportation Management Plan (TMP) that achieves the following: explores methods and strategies to meet prescribed parking ratios, includes a thorough rationale and technical analysis in support of all TMP findings; and encourages employee commuting by modes other than the single-occupant vehicle. Until the applicant has submitted a TMP, staff recommends that the Commission enforce the Comprehensive Plan Policies for the Federal Elements.

### *Parking Ratio*

The Draft Master Plan proposes a parking ratio of one space for every three employees (1:3) plus visitor parking, resulting in a total of 5,307 parking spaces on the campus. For sites outside of the Central Employment Area, but within the historic District of Columbia boundaries, the Comprehensive Plan Policies for the Federal Element state that the optimal parking ratio should not exceed one space for every four employees (1:4). It also states that parking should only be provided for those federal employees who are unable to use other travel modes. Given the site's proximity to two Metrorail Stations, existing Metrobus service, and the Comprehensive Plan policies regarding parking ratios in the District, parking for the St. Elizabeths Campus should be modified to meet the desired 1:4 ratio of parking spaces to employees.

### *Incentives for Carpooling and Alternative Modes of Travel*

To decrease the number of employees driving to the campus, GSA needs to clearly identify incentives for carpooling and alternative modes of travel. In addition to the federally required transit subsidy and the Metro shuttle buses proposed in the Draft Master Plan, GSA should encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation for federal commuters. To achieve this goal, GSA should do the following as identified in the Comprehensive Plan:

- Give priority to carpool and vanpool parking over that for single-occupant vehicles. This can be achieved by giving parking spaces or subsidies to carpools and vanpools.
- Consider nearby commercial parking space availability in calculating parking requirements, assuming that employees who choose to drive can purchase parking in nearby private facilities at market rates. The parking garage at the Anacostia Metrorail station is currently underutilized. Additional opportunities in the emerging Historic Anacostia District and St. Elizabeths East Campus should also be considered. Coordination with the District and other affected parties will be needed to analyze access to off-site garages (i.e., Suitland Parkway).
- Since the need for shuttles internal to the site has already been identified, reduction in parking spaces in conjunction with expanding the area of these shuttles to include nearby Metrorail stations would have a number of community and environmental benefits that outweigh the slight increase in commuting time.
- Steadily increase transit subsidy rates, and consider applying subsidies and incentives to other modes, such as biking, walking, carpooling and vanpooling.
- The Comprehensive Plan recommends that agencies use federal infrastructure to develop and connect the trail systems. Building the section of the proposed Fort Circle Parks Trail within the Project Area (from Fort Greble to Stanton Rd) would service an alternative mode of transportation and also serve as a recreational amenity for both employees and the community. The alignment of this trail is outside the proposed security fencing of the campus.

### *Levels of Service during Heightened Security*

The impact of 14,000 employees on the local and regional transportation system would increase during times of heightened security. Identify these impacts in the Transportation Management Plan and present mitigation strategies.

### *Historic Entrance at Gate 1*

Gate 1 and 2 are the campus's historic gates, located along the historic wall facing Martin Luther King Jr. Avenue. In the Draft Master Plan, both gates would be enhanced to meet increased usage and security screening needs. The EIS states that these modifications would severely compromise the entrance experience and virtually eliminate the therapeutic and ornamental landscape east of the cottages. To minimize impacts to the original section of the campus and to protect the public view shed from Martin Luther King Jr. Ave SE, designate Gate 2, rather than Gate 1, as the primary access point from Martin Luther King Jr. Ave. Maintain the original use of Gate 1 for the historic and/or ceremonial entrance to the campus. Gate 2 or 3 may also be used for visitor access.

## **Comprehensive Plan, Transportation Policies (excerpted, pp. 83 - 88)**

### **Parking**

*The federal government should:*

- 1. Provide parking only for those federal employees who are unable to use other travel modes.*
- 2. Give priority to carpool and vanpool parking over that for single-occupant vehicles.*
- 5. Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design.*
- 7. Consider nearby commercial parking space availability in calculating parking requirements, assuming that employees who choose to drive can purchase parking in nearby private facilities at market rates.*

### **Parking Ratios**

- 3. Outside of the Central Employment Area, but within the Historic District of Columbia boundaries, the parking ratio should not exceed one space for every four employees.*

### **Transportation Management Plans (TMPs)**

*Federal Agencies should:*

- 1. Prepare Transportation management Plans to encourage employee commuting by modes other than the single-occupant vehicle.*
- 2. Develop TMPs that explore methods and strategies to meet prescribed parking ratios, and include a thorough rationale and technical analysis in support of all TMP findings.*
- 3. Analyze scenarios that incorporate data on employee home zip codes, nearby bus routes, Metrorail.*

### **Transportation Demand Management**

*The Federal Government should:*

- 1. Encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation for federal commuters.*
- 2. Steadily increase transit subsidy rates, and consider applying subsidies and incentives to other modes, such as biking, walking, carpooling and vanpooling.*

**Comprehensive Plan, Parks and Open Space Policies (excerpted, p. 124)**

Trails

*The Federal Government should:*

1. *Develop new trails and complete partial trails that connect to parks, schools, businesses, and other community amenities to provide a system of contiguous regional trails for extensive recreational and transportation use.*
3. *Use federal infrastructure to develop and connect trail systems.*
8. *Complete the Fort Circle Park trail system...*

*Measures to minimize and/or mitigate the effects on Transportation:*

- Develop a Transportation Management Plan that conforms to the Transportation policies of NCPC's Comprehensive Plan for the National Capital (taking into account that 90% of employees would work during standard business hours):
  - Meet the Comprehensive Plan goal for a parking ratio of 1 space per 4 employees to address the documented impacts of increased air pollution and traffic congestion, and take advantage of the site's proximity to public transportation.
  - Identify and support alternative modes of travel using subsidies for public transportation, shuttle buses to and from nearby Metro stations, and other incentive programs.
  - Complete the section of the Proposed Fort Circle Parks Trail within the Project Area (from Fort Greble to Stanton Road) to provide a route for cyclists to and from the campus.
  - Identify anticipated impacts to the transportation level of service during heightened security.
  - Work with the District of Columbia, National Park Service, and other Consulting Parties to analyze additional and/or alternative means of accessing the campus via Suitland Parkway (under the jurisdiction of the District Department of Transportation) to accommodate off-campus parking structures.
- Designate Gate 2, rather than Gate 1, as the primary access point from Martin Luther King Jr. Ave. to minimize impacts to the original section of the campus as well as the view shed radiating from the Gate 1 point of entry. Maintain the original use of Gate 1 for the historic and/or ceremonial entrance to the campus.

**Community Benefits**

The Comprehensive Plan states that the Federal Government should plan federal workplaces to be compatible with the character of the surrounding properties and community and, where feasible, to advance local planning objectives such as neighborhood revitalization. One of the ways this policy can be achieved is by locating publicly accessible activities within federal workplaces on public streets. St. Elizabeths Campus is located in one of the most disadvantaged Wards (Ward 8) in the District of Columbia. The District is undertaking several initiatives to revitalize this section of the city such as the Barry Farm New Communities Initiative, the Great Streets Initiative on Martin Luther King Jr. Ave SE, the new streetcar, and redevelopment of Poplar Point. Development of the West Campus should also serve to revitalize the local area.

The Draft Master Plan for St. Elizabeths West Campus is not likely to result in positive economic development/community impacts for the neighborhoods in Ward 8. The preferred plans for the West Campus would result in an insulated secure campus with almost no public access. All employee amenities such as parking, food operations, fitness facilities, banking, dry

cleaning, and daycare are proposed to be on-site. Both preferred alternatives would create an environment that would serve employee needs wholly on-site, without a need to venture into the neighboring community.

Moving uses that don't require special security off-campus to other locations (such as along Martin Luther King Jr. Ave SE and to the East Campus) would be a catalyst for economic development in the neighborhood. There would also be an added benefit of reducing the total square footage of the development program on-site. The employee amenities discussed in the Draft Master Plan equal approximately 300,000 gross square feet. If the parking ratio were modified to meet the Comprehensive Plan goal of 1:4 and, along with employee amenities, were moved off-site, the overall West Campus program would be reduced by more than 2 million gross square feet while increasing business opportunities in the neighborhood.

GSA also has an opportunity to minimize some of the major traffic impacts by building the section of Fort Circle Parks Trail from Fort Greble to Stanton Road as an alternative mode of transportation as well as a recreational amenity. The Comprehensive Plan recommends that agencies use federal infrastructure to develop and connect the trail systems. The alignment of this trail is outside the proposed security fencing of the campus.

**Comprehensive Plan, Federal Workplace Policies (excerpted, p. 50)**

Coordination with the Community

*The Federal Government should:*

3. *Plan federal workplaces to be compatible with the character of the surrounding properties and community and, where feasible, to advance local planning objectives such as neighborhood revitalization.*
6. *Locate publicly accessible activities within federal workplaces on public streets and other pedestrian access levels.*

*Measures to stimulate growth and economic opportunities in Ward 8 and provide citywide benefits:*

- Propose alternative parking solutions outside the secure campus to encourage employee patronage of businesses along Martin Luther King Jr. Ave. and in Historic Anacostia. Analyze shared parking opportunities on the East Campus, in Historic Anacostia, and at the Anacostia and/or Congress Heights Metro Stations.
- Work with the District Department of Transportation to coordinate streetscape improvements along Martin Luther King Jr. Ave. to improve the pedestrian experience into Historic Anacostia.
- Develop a shuttle system between the campus and the Anacostia and/or Congress Heights Metro Stations to promote integration of the DHS workforce into the surrounding communities and to promote patronizing of local businesses.
- Locate support facilities (e.g., fitness center, child care center, barber shop, etc.) off-site to encourage integration of the DHS workforce into the surrounding neighborhood and also to provide business and employment opportunities to local residents.
- Build the section of the Proposed Fort Circle Parks Trail within the Project Area (from Fort Greble to Stanton Road) to provide a recreational amenity for both employees and community members.
- Identify vehicular and pedestrian access to the Cemetery.
- Identify specific opportunities and means for the public to access the Point.

## **Historic Preservation – Buildings and Landscape**

The National Historic Landmark (NHL) designation for St. Elizabeths documented and established the national significance of the hospital campus for its history and association with pioneering treatment for the mentally ill, its architecture, and its designed therapeutic landscape. The significance of its setting is due in part to its siting on the bluffs of the Anacostia Hills above Washington.

GSA has recognized that the adverse effects to the NHL -- architecture, landscape, and views -- would be among the most serious of the impacts of the undertaking. GSA has worked diligently over the past several years to protect the physical site by mothballing the buildings properly against the elements; by researching the significant elements of the site so that a Master Plan could be informed by historical knowledge; by inventorying and providing historic photographs and documents and information to the public in meetings and on a website; and by engaging a consultant team that has assessed the re-use potential of the historic buildings, the treatment of the cultural landscape, and the areas of the campus where additional program might be accommodated. Despite these professional efforts, the proposed DHS program -- its size and security status -- would significantly and adversely affect the nationally significant historic campus to the extent that the architectural relationships, landscape, and our ability to understand the activities that occurred at St. Elizabeths would be compromised.

GSA and NCPC have a statutory requirement under Section 110(f) of the National Historic Preservation Act to “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” GSA should complete several documents in the near future to assist in developing a final Master Plan and a Programmatic Agreement, including a Cultural Landscape Report, Design Guidelines for new construction, a rehabilitation and treatment plan for the historic buildings and landscapes, sufficient information about the new construction on the south façade of the Center Building (in Alternative 4) so that the alternative can be fully assessed, and information about staging and construction impacts to allow staff to assess the impacts to the landscape and historic buildings, and to make recommendations about the placement and size of new construction.

### **Comprehensive Plan, Preservation and Historic Features Policies (excerpted, p. 161-167)**

#### National Capital Image

*The federal government should:*

- 4. Protect the skyline formed by the region’s natural features, particularly the topographic bowl around central Washington...*

#### Stewardship of Historic Properties

*The federal government should:*

- 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.*
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.*
10. *Ensure the continued preservation of federal historic properties through ongoing maintenance and transfer to an appropriate new steward when disposal of historic properties is appropriate.*
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.*
15. *Plan, where feasible, for federal historic properties to serve as catalysts for local economic development and tourism.*

The Historic Plan of Washington, D.C.

*The federal government should:*

7. *Protect views outward from the L'Enfant City and views inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include the west campus of St. Elizabeths Hospital and other parts of the Anacostia ridge, the Arlington ridge, and the escarpment north of Florida Avenue, NW.)*

*To conclude the Section 106 process and comply with Section 110(f), achieve the following:*

- *Modify building square footage, building footprints, and massing to be more compatible with the historic buildings, historic landscape, and the campus setting.*
- *Continue Section 106 consultation in order to develop a Programmatic Agreement that will respond to and resolve the adverse effects.*
- *Develop a Historic Preservation Plan and Cultural Landscape Report to identify the required treatments to appropriately preserve and rehabilitate the historic buildings and the historic landscape.*
- *Rehabilitate the historic buildings and historic landscape according to the Secretary of the Interior's Standard's for the Treatment of Historic Properties.*
- *Develop Design Guidelines for new construction aimed to minimize harm to the historic buildings and their setting.*
- *Plan and document construction and staging impacts to avoid damage to and loss of historic buildings and landscape features.*

### **Environmental Sustainability**

The goals and policies of the Federal Environment element of the Comprehensive Plan are to promote the federal government as a regional leader in environmental stewardship. The proposed environmental activities included in the Master Plan strive to meet these goals, seeking to incorporate a variety of innovative environmental technologies into the development and to achieve a Silver LEED rating.

As the plan is further developed, Staff encourages the applicant to include low impact development techniques, sustainable materials and systems, and the incorporation of pervious surfaces and retention ponds to reduce stormwater runoff in the Master Plan. The applicant is also encouraged to use innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, rain gardens, and other methods of reducing erosion and pollution of surface waters. Trees should also be retained where possible, and when removal is necessary, trees should be replaced to prevent a net loss.

**Comprehensive Plan, Federal Environment Policies (excerpted, p. 138)**

Water Quality

*The Federal Government should:*

3. *Minimize tree cutting and other vegetation removal to reduce soil disturbance and erosion, particularly in the vicinity of waterways. When tree removal is necessary, trees should be replaced to prevent a net tree loss.*
5. *Use pervious surfaces and retention ponds to reduce stormwater runoff and impacts on off-site water quality.*
7. *Encourage the use of innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface walkways, to reduce erosion and avoid pollution of surface waters.*

*Measures needed to promote environmental sustainability:*

- Mitigation for the loss of tree canopy and habitat on-site.
- Planning for stormwater management / low impact development techniques such as bioswales, green roofs, and retention wells to manage stormwater on site. Also indicate how stormwater quantity and quality would be managed during construction.
- Planning for hazardous materials abatement and waste disposal, construction materials selection, energy sources and emissions.

## CONFORMANCE

### Comprehensive Plan for the National Capital: Federal Elements

The St. Elizabeths West Campus Master Plan is required to conform to the five Federal Elements of the Comprehensive Plan for the National Capital (Plan): the Federal Workplace, Transportation, Parks and Open Space, Federal Environment, and Preservation and Historic Features. While the two preferred alternatives in the Draft Master Plan meet a (federal workplace) use that is in conformance with the Plan, the preferred alternatives do not comply with several policies included in the Plan (refer to *Project Analysis* above).

The Comprehensive Plan establishes a goal for a parking ratio that does not exceed one space for every four employees within the Historic District of Columbia. The Draft Master Plan proposes one space for every 3 employees. This ratio substantially increases the number of employees commuting to work and the amount of parking on camps, resulting in several additional conflicts with the Comprehensive Plan policies. Furthermore, the Draft Master Plan should consider nearby commercial parking space availability but it does not. NCPC has not seen a Transportation Management Plan that would address these issues and how DHS will encourage

ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation for federal commuters.

There are also several policies in the Comprehensive Plan ensuring that the forested ridgelines of the topographic bowl are protected and that the building masses should be subordinate to the natural topography of the Anacostia Hills. The Draft Master Plan is in direct conflict with these policies as the massing of the proposed development at St. Elizabeths can be seen from several vantage points in the District and results in the removal of more than 18 acres of vegetation.

Several policies in the Comprehensive Plan are focused on the impact of federal government in local communities and creating a community benefit. The Plan encourages federal workplaces to be compatible with the character of the surrounding community and where feasible should advance local planning objectives such as neighborhood revitalization. Publicly accessible activities within federal workplaces should be located on public streets. While the implementation of the Master Plan would result in 14,000 new employees in the distressed neighborhood of Ward 8, there would be no community benefits because of the nature of the campus. The campus would be walled off from the neighborhood with no public access. Currently all employees would drive into the campus and park and then leave the campus at the end of the day. All employee amenities (such as cafeterias, banks, childcare, dry-cleaning) would be located on the campus so that employees do not need to patronize nearby businesses. The Draft Master Plan does not meet local planning objectives to revitalize Historic Anacostia and the surrounding Ward 8 community.

Finally, the Draft Master Plan is in conflict with the Stewardship of Historic Properties Element of the Comprehensive Plan. While GSA is salvaging several historic buildings with the redevelopment of St. Elizabeths, it is not using this historic property for an adaptive use that is consistent with the significance and character of the property. The proposed development program of an additional 6.3 million square feet on the campus significantly alters the historic buildings and landscape of the site.

#### National Environmental Policy Act

Pursuant to the requirements of NEPA, GSA prepared an Environmental Impact Statement (EIS) on the plan. The GSA has circulated the Draft EIS for public comment beginning on September 28, 2007. The GSA will be completing its review of comments from the Draft EIS public review and developing a Final EIS in January 2008. GSA will conclude the EIS with a Record of Decision on the final Master Plan in late February 2008.

NCPC is a federal agency with its own NEPA obligations. NCPC has participated as a cooperating agency in GSA's development of its EIS, and anticipates that NCPC's Executive Director will find the EIS, including comments such as those NCPC will make, as adequate; and that NCPC will use the GSA EIS to inform its review and recommendations on the Final Master Plan.

On or about November 13, 2007, NCPC staff will submit a comment letter on the draft EIS to highlight several issues, as follows:

- That the substantial removal of vegetation in any proposed plan would not be supported by the Comprehensive Plan objectives of the new policies of the Commission. NCPC staff will strongly request that the final EIS specify additional guidelines for specific mitigation efforts under the guidance of a prepared tree and open space conservation plan regarding maintaining open space, with development areas. Green space preservation should be maintained within the plan as a component of its development.
- Cultural landscape features such as roads, paths, and tree lines could be disrupted or lost entirely. New construction would significantly alter the historic context of individual buildings and building groups, and could obscure the relationship between buildings. In the context of view shed analysis, views to and from the site as well as views through the site have been shown to be lost or significantly altered. Staff will emphasize that a fully evaluated and consulted programmatic agreement be developed under Section 106 of the National Historic Preservation Act (NHPA) must be carried forward by GSA to address these important and adverse effects to the historic site districts.
- The National Historic Landmark and Historic District of the West Campus of St. Elizabeths Hospital would be adversely affected by the scale and magnitude of new construction, as well as the loss of significant historic resources. NCPC staff will emphasize that provisions of Section 110 (f) of the NHPA apply to the Master Plan undertaking in order to plan for minimization of harm to the historic buildings, landscape features, and view sheds.
- The addition of 14,000 employees on the West Campus would have a direct, major, long-term, adverse impact on traffic operations of the immediate vicinity in the District. Mitigation measures that are not fully defined by the DEIS would be required for the Martin Luther King, Jr. (MLK) / Malcolm X intersection, and the I-295 SB / Suitland Parkway ramp is problematic to function under any of the alternatives. The Levels of Service for certain peak volumes will continue to operate at “F” for the I-295/Suitland Parkway area, of which a portion of the West Campus traffic contributes but is not defined. Specific design measures to mitigate the Level of Service “F” must be evaluated in the final EIS, particularly as they may pertain to the afternoon peak hours of the Martin Luther King, Jr. (MLK) / Malcolm X intersection.
- In the context of the reconstruction of Malcolm X Avenue / I-295 Interchange for access to the West Campus, the increased usage of the proposed new interchange by DHS employees would have direct, moderate, long-term, adverse impacts on traffic volumes, with Levels of Service for peak volumes operating at “F” as specified by the DEIS. The proposed interchange design modifications allow for an opportunity to improve on some of the existing interchange issues (i.e. inadequate distance on northbound I-295 for weaving operations and no direct access between southbound I-295 and Malcolm X Avenue), but cannot solve the sheer volume of vehicles anticipated, as based on the DEIS analysis. With the failure of the traffic flow at peak volume time periods, the new interchange does not appear to be able to feasibly serve the need as an entry point for proposed DHS operations. NCPC staff requires identification and evaluation of additional alternatives for access to the West Campus in the final EIS documentation.

## National Historic Preservation Act

### *History of the St. Elizabeths Campus*

In 1852, Dorothea Dix, a noted mental health advocate, persuaded Congress to build a model hospital for the treatment of the insane of the Army and Navy of the United States and the District of Columbia. Dr. Charles Nichols, St. Elizabeths' first superintendant (1852-79), chose the hospital site: farmland on a high bluff overlooking the Anacostia and Potomac Rivers with panoramic views of the city of Washington. The most advanced treatment of the insane at that time emphasized the therapeutic benefits of a natural setting.

The Center Building was designed by architect Thomas U. Walter along the Kirkbride plan; the central administration building was flanked by tiered wards for patients, who were segregated by sex and by type and severity of illness. They were also segregated by social class and race. Walks and carriage drives afforded patients views of the natural and landscaped beauty of the site. Below the principal promontory to the north of the Center Building ("the Point"), the land was planted for agricultural use—crops and fruit trees.

Soon, Civil War soldiers were being treated and housed on the campus for convalescence. It was during the war that the name St. Elizabeths—the name of the original 17th-century land grant—became commonly used; the name of the institution itself was formally changed in 1916. The cemetery was established, in which up to 500 individuals, black and white, Union and Confederate troops, as well as civilian indigents, were buried.

During the second building phase (from 1877 to 1899), the campus was expanded southward and eastward with "cottage plan" dormitory buildings, such as the Allison buildings, which provided a more homelike environment for the chronically ill. The landscape was substantially embellished with ornamental gardens and specimen trees.

The third phase of expansion (1899 to 1903) added the "letter" buildings, surrounding a field ringed by curving drives and large canopy trees. The Renaissance Revival-style buildings were designed by the Boston architectural firm of Shepley Rutan Coolidge.

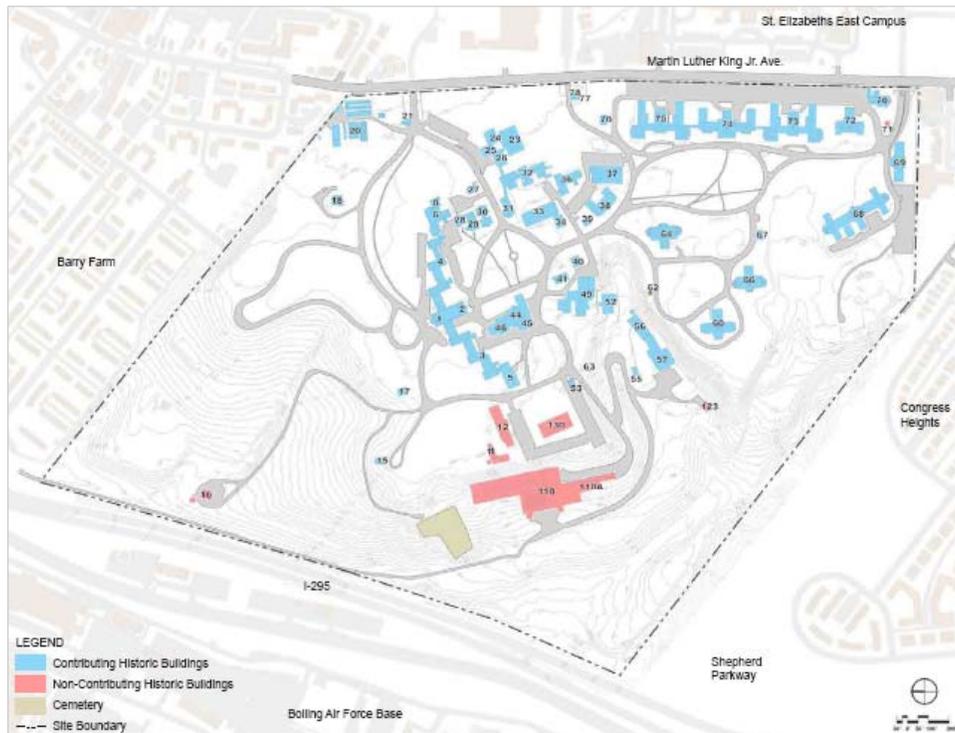
The fourth phase of expansion—to the east campus—was carried out shortly thereafter. The underpass between the two sides of the campus was constructed. Hitchcock Hall, built in 1910, provided an assembly hall and theater. After that year, the campus was essentially complete. Several buildings have been demolished since then.

The adjacent Shepherd Parkway is the site of two forts built for the protection of Washington during the Civil War. The remains of the fortifications of Fort Carroll and Fort Greble are extant. The Fort Circle Parks (Forts Drive) were incorporated in the Senate Park Commission Plan of 1901-02. The parkway was never constructed, however. The Fort Circle Parks System was listed in the National Register in 1974. A 205-acre park designated Reservation 421 and administered by the National Park Service, Shepherd Parkway is a woodland park with picnic facilities.

*Significance of the Site: National Historic Landmark*

*The Secretary of the Interior designated St. Elizabeths a National Historic Landmark (NHL) in 1991 for the national significance of the site and its exceptional value in illustrating the history of the United States. St. Elizabeths represents important nineteenth and twentieth century social*

and humanitarian movements associated with the advance of mental health care. It is associated with nationally significant leaders in the treatment of mental illness such as Dorothea Dix and Dr. Charles Nichols. St. Elizabeths is also significant for its collection of Collegiate Gothic, Italianate, and Renaissance Revival architecture designed by the Architect of the Capitol, Thomas U. Walter, and the Boston firm of Shepley Rutan Coolidge. The period of significance for the historic district is 1852 through 1940. The NHL includes 82 contributing resources, 62 of which are on the West Campus (Figure 11).



**Figure 11: Historic Buildings**

Historic landscape features are integral to the significance of the site and to the National Historic Landmark designation. Sixty individual landscape features were identified (Figure 12). A *Cultural Landscape Report (CLR)* is scheduled to be completed in fall 2007 and will be useful in establishing the integrity and condition of the features and in implementing treatment measures.

The lawns surrounding the Center Building are critical elements of the oldest therapeutic landscape at St. Elizabeths. Open lawns are set with shrubs and trees, a formal garden, curvilinear drives and paths, and small-scale features such as gazebos, fountains, brick walls, iron railings, and a lawn tennis court.



**Figure 12: Historic Landscapes**

The central field around which the “letter” buildings are arrayed is another important therapeutic landscape. Open lawn is set with specimen trees and a network of curvilinear road and walks. Important view sheds exist within this area.

Near Entrance #1 and the gatehouse, the flat land leads to steep slopes toward the Anacostia River and heavy, later-growth vegetation. The land was originally used for farming, and greenhouses produced plants for the grounds and patient wards. The “Point” provides the overlook vistas of the city of Washington for which the campus is known.

The ravine contains the power house and service buildings. The industrial landscape is characterized by the steeply sloping hairpin road into the ravine and stone stairs near the stone ice house.

The cemetery is now reached by a long curving pedestrian path through the woods from the plateau. The grass lawn of the cemetery continues to slope toward the Potomac River, and the rows of headstones are surrounded by canopy trees. To the north, the campus’s woodland slopes are former agricultural land and orchards. This area is visible as part of the approach to Washington along Interstate 295.

The National Historic Landmark designation also includes historic view sheds and vistas for the west campus. The Section 106 consultation since 2005 has clarified the view shed documentation, however, since the views from the site toward the rivers, the US Capitol, the Navy Yard, and the Virginia shoreline are not limited to single points on campus (as indicated in earlier documentation) but are available from many places on the plateau.

Similarly, views toward the campus from vantage points in the surrounding area can be enjoyed from a variety of locations, although some of the views are limited by their distance from the site. These views have been assessed in the context of the current Section 106 consultation. The most significant views toward St. Elizabeths can be found from nearby locations such as the Washington Navy Yard, Hains Point at East Potomac Park, the Congress Heights neighborhood (determined eligible for listing in the National Register) and vehicle approaches to the campus. The views of the green slopes of the bluff form the southern rim of the topographic bowl that surrounds the nation's capital.

Views within the site include those that convey the spatial organization of the campus, the specimen trees over broad lawns, the curving walkways and drives, and the changes in elevation. All of these views contribute to the natural or embellished therapeutic campus landscape that continues to be the hallmark of the site today.

#### *Section 106 and Section 110 of the National Historic Preservation Act*

GSA is serving as lead agency for Section 106 review. Section 106 is the consultation process required when an undertaking is determined to have an adverse effect on a property listed in the National Register of Historic Places. The agency is required to resolve the adverse effects by seeking ways to avoid, minimize, or mitigate them. The agreements reached to resolve the effects are memorialized in either a Memorandum Agreement or in a Programmatic Agreement.

Section 110(f) is invoked because the campus is a National Historic Landmark, which requires that “the federal agency official, to the maximum extent possible, undertake such planning and action as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” Since it has approval authority for the proposed undertaking under the Planning Act, the National Capital Planning Commission shares this requirement and responsibility with GSA.

GSA began Section 106 consultation meetings with a large number of interested parties — organizations, individuals, and agencies—in 2005. GSA anticipates that the Section 106 consultation will culminate in a Programmatic Agreement, and result in other documents such as Design Guidelines for new construction and a historic preservation plan for the rehabilitation of some of the historic buildings on the campus. In addition, a Cultural Landscape Report (CLR) is being written; it will provide an assessment of the landscape character and features of the site and will provide treatment guidance.

#### *Impacts and Effects to Historic Resources determined by GSA*

GSA's conclusions in its Draft Environmental Impact Statement are that direct impacts to historic resources and buildings from the selection of Alternative 3 or Alternative 4 “would be major, long-term, and adverse due to the removal of [25 or 18, respectively] contributing buildings and the increased ratio of developed to undeveloped area on the site.”

The direct impacts to the cultural landscape features “would be long-term, major and adverse by having an adverse effect on [40 or 27, respectively] of the 60 landscape features [previous] identified. The construction of the three entrances along Martin Luther King, Jr. Avenue would also have direct, long-term, major, adverse effects on the entrance sequence.”

The direct impacts on the views and vistas, due to new construction, “would generally be direct, major, long-term, and adverse. This applies to views to and from the Center Building, views from the lawn, views from Congress Heights Historic District, and views to and from the West Campus cemetery.”

*In Alternative 3*, 25 contributing buildings would be demolished and 37 contributing buildings would be retained and rehabilitated. The affected buildings include the greenhouses, three buildings immediate south of the Center Building, the kitchen and bakery buildings, the four Allison Buildings; and two of the “letter” buildings. The first “cottage” building would be retained as would three of five patient wards.

The demolished buildings would be replaced with four areas of new construction; new buildings would be designed through GSA’s Design Excellence Program. The new construction would be significantly larger in plan and scale than the historic buildings and would alter the arrangement of buildings to each other and to their landscape and open space setting. Some of the new construction would occur in areas where historic-era buildings were previously demolished.

The proposed additions along the rear length of the Center Building would alter the historic relationship of the Center Building to many of the buildings on campus and their setting. “The removal would adversely affect the ability of the site to represent the complexity and magnitude of the hospital operations and its function as a self-sufficient facility. Removal of the buildings removes the physical representation of the activities and industry that occurred on the site, the role that patients played in the operations of the site, and the role that patient participation in the operations of the site played in their therapy.” The historic pedestrian circulation patterns, historical roadways, and important views within the site would also be adversely affected.

The clearing of the land for construction, new roadway construction, and the character of the new buildings designed for modern office use would alter the setting of the “letter” buildings. The historic framing of buildings on the west side of the “letter” grouping would be restored, although the above-ground portion of this new construction would be approximately 815,000 square feet, larger in scale than the former buildings, which were approximately 30,000 and 62,000 square feet respectively.

Deep excavation and construction adjacent to the historic buildings could affect their stability. Construction of underground parking facilities along the perimeter of Martin Luther King, Jr. Avenue, SE may affect the foundation and stability of Gatehouse #1 and the perimeter brick and stone wall.

The proposed new construction at the location of the existing Allison Buildings would adversely affect the spatial organization and experience of the entrance drive and the character of the site as viewed from the East Campus of the St. Elizabeths historic district.

*GSA intends to rehabilitate the remaining contributing buildings in accordance with the Secretary of the Interiors' Standards for the Treatment of Historic Properties and the applicable guidelines. The contributing buildings that would be rehabilitated for new uses include many of the important structures within the NHL.*

*The major expansion of the campus (the letter buildings) would be largely preserved and adaptively used. Their reuse would have a direct, moderate, long-term beneficial impact on the understanding of the history and progression of mental health care treatment.*

*Rehabilitation of contributing buildings on the West Campus in accordance with the Secretary of the Interior's Standards would have a moderate to major, direct, long-term, beneficial effect on the individual buildings. However, construction of new buildings and parking facilities on the west Campus would have a major, direct, long-term, adverse effect on the characteristics that make the site a National Historic Landmark.*

*In Alternative 4, 18 contributing buildings would be demolished and 44 contributing buildings would be retained and rehabilitated. As in Alternative 3, the greenhouses, the Allison Buildings, and two of the letter buildings would be demolished. Many of the service buildings would be demolished in both alternatives. New construction would be similar to that in alternative 3, including development in areas of previously demolished buildings, although of a scale and footprint that is not compatible with the scale of the historic buildings.*

In Alternative 4 significant new additions to the Center Building are not proposed (in contrast to Alternative 3) but the “nature and extent of the Center Building modifications that are necessary to deliver adequate circulation, security, and other programmatic requirements remain under consideration.” However, additions would adversely affect the historic pedestrian circulation patterns, historic roadways, and important views within the site.

The effects to the large, landscaped lawns surrounding Buildings L and Q would be the same as in Alternative 3. The above ground portion of the new construction would be approximately 1,085,000 square feet, which is larger in scale than the former buildings, which were approximately 30, 000 and 62,000 square feet respectively.

Alternative 4 proposes new construction at the greenhouse site and a larger new footprint at the Allison buildings, which would adversely affect the spatial organization and experience of the entrance drive and the character of the site as viewed from the east campus of the St. Elizabeths historic district. The residential character of the site and the two-story Burroughs Cottage would be adversely affected by the size and height of the adjacent office building construction on the greenhouse site.

*The Center Building would be adaptively used as the headquarters for the Secretary of Homeland Security, which would reinforce its historic importance to the campus. Building #31, the first federal facility for the treatment of insane African-American women would be retained. Retention of more service buildings under Alternative 4 would provide a beneficial effect in maintaining the ability of the site to represent the complexity and magnitude of the historical hospital operations and its function as a self-sufficient facility. The letter buildings would be largely preserved and adaptively used, as in Alternative 3.*

*As in Alternative 3, Rehabilitation of contributing buildings on the west campus, according with the Secretary of the Interior's Standards, would have a moderate to major, direct, long-term, beneficial effect on the individual buildings. However, construction of new buildings and parking facilities on the west campus would have a major, direct, long-term adverse effect on the characteristics that make the site a National Historic Landmark.*

## COORDINATION

### Coordinating Committee

The Coordinating Committee, at its October 10, 2007 meeting, reviewed the proposed Draft Master Plan and forwarded the proposal to the Commission with the statement that the project has been coordinated with all participating agencies, except the District of Columbia Office of Planning (DCOP). The representative for DCOP noted a number of unresolved historic preservation and transportation issues. The participating agencies were NCPC; the District Department of Transportation; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

### U.S. Commission of Fine Arts

On Thursday, October 18, 2007, the Commission of Fine Arts reviewed the Draft Master Plan for St. Elizabeths, but did not take a formal action. Commission members debated the facts and merits of the Master Plan, and came to a consensus opinion that GSA was trying to place an inappropriately large amount of development on the campus, particularly if historic preservation was a primary concern. They noted that the most important quality of the campus is its prominent location on the topographic escarpment framing the national capital and that the proposed plan did not improve, but detracted from, this resource. The Commission's discussion centered on a concern that GSA had not explored a sufficient number of meaningful alternatives for them to make an informed judgment about how the site could accommodate the DHS program.

Several speakers, including Consulting Parties to the Section 106 process, elaborated on these concerns that a consensus approach for 2.5 million to 3 million square feet of development crafted through the Section 106 process was not addressed in the master plan. The National Trust for Historic Preservation noted that both preferred alternatives, Alternative 3 and Alternative 4, are inconsistent with the Section 110 process. The District of Columbia Office of Planning testified that GSA is overbuilding the site and that the parking ratio and the size of the parking garages constitute a large part of that overbuilding. The Brookings Institution testified that the project is too big, will be walled off from the surrounding neighborhoods, generating no economic spinoff, and that the project will be a losing proposition for the community. Following testimony, the Commission declined to take action on the Draft Master Plan, noting that it is not yet ready for consideration and directed the applicant to undergo further consultation on the project with the District and Consulting Parties, and to listen to and benefit from the advice gained through that process.

### National Environmental Policy Act Coordination

GSA has been the lead agency for development of an Environmental Impact Statement (EIS) for the reuse of the St. Elizabeths campus and location of a headquarters for the Department of Homeland Security; GSA commenced preparation of the EIS in June 2005. NCPC has participated as a cooperating agency for the EIS. In carrying out its lead agency responsibilities, GSA has developed information, held numerous meetings with NCPC and other agencies, and has conducted a number of public hearings. Its current draft Environmental Impact Statement has been made available for public comment. The most recent public hearing on the DEIS is as follows:

On Thursday, October 18, 2007, the General Services Administration held a public hearing in Ward 8 to receive comment on the Draft Environmental Impact Statement (DEIS). GSA described the impacts that the project is likely to have on the surrounding environment and on the community, including traffic impacts and the possibility of gentrification. GSA solicited public comment at the meeting, but did not respond to comments made by the public. Speakers focused on concerns about loss of access to the Point, traffic impacts, soil contamination, and the potential displacement of low income residents due to gentrification. The District of Columbia Office of Planning (DCOP) testified that it had serious concerns about the project being too big with a program that is too rigid to support a meaningful dialog about alternatives. DCOP also indicated that the parking ratio should comply with the Comprehensive Plan, that the parking was a big part of the problem of overbuilding the site, and that the District is willing to consider putting some of the development into leased space on the East Campus. Finally, DCOP indicated that it wanted to discuss options that have a more positive impact on the surrounding neighborhoods by creating a true interaction between the two campuses.

### Consultation with the District of Columbia

Staff has been consulting with both the District of Columbia Office of Planning (DCOP) and the District Department of Transportation (DDOT) about the possibility of moving some or all of the proposed parking and some of the planned support uses from the West Campus to the East Campus. The Draft Master Plan includes approximately 300,000 square feet of support functions and 5,000 parking spaces. Moving the parking would require changes to the access plan from the regional roadway system. The Office of Planning has expressed a general interest in talking with GSA about incorporating parking and other support functions into private sector development on the East Campus. The District Department of Transportation is currently considering the concept of access to the East Campus from the Suitland Parkway to reach potentially relocated parking structures there. Both DCOP and DDOT support a reduction in the number of parking spaces to bring the plan into conformance with the Comprehensive Plan parking ratio of 1:4 for this part of the District of Columbia.

## Referral to District of Columbia Agencies and Organizations

As part of NCPC's review, the Draft Master Plan was referred to the following District of Columbia entities:

- District of Columbia Deputy Mayor for Economic Development
- District of Columbia Department of Transportation (DDOT)
- District of Columbia Office of Property Management (DC-OPM)
- District of Columbia Office of Planning (DCOP)
- District of Columbia State Historic Preservation Office (DC SHPO)
- District of Columbia Office of the Environment (DCOE)
- Washington Metropolitan Area Transit Authority (WMATA)

Comments received to date are as follows:

### *DCOP Review Comments – Security Master Plan Section*

The District of Columbia Office of Planning submitted written comments on the Security Master Plan section, identifying concerns with regard to proposed modifications to entry gates along Martin Luther King Jr. Avenue, transportation/parking concerns, perimeter security impacts, and light pollution.

Concerns were also raised with regard to a discrepancy between arrivals along Martin Luther King Jr. Avenue versus the new access road. The Draft Master Plan identifies the former accommodating 30% and the latter 70%; the Security Master Plan section reverses those figures, indicating that 73% of arrivals would be from Martin Luther King Jr. Avenue and the remainder from the access road. GSA should review this disparity and identify the actual intended arrivals at each entrance.

Although formal reviews have not yet been received from several of these affected parties, NCPC will continue to solicit comments from each as the master planning process continues.