

CAPITOL HILL RESTORATION SOCIETY



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December 31, 2014

Ms. Catherine Childs
1314 Harwood Street, SE
Building 212
Washington Navy Yard
Washington, DC 20374

by USPS and email to mbwsection106@mbweis.com

Subject: Section 106 Review for Multiple Projects in Support of Marine Barracks, Washington, DC

Dear Ms. Childs:

The Capitol Hill Restoration Society (CHRS) is committed to preserving the historic fabric and character of Capitol Hill and protecting its neighborhoods, environment, cohesiveness, and residential nature. CHRS participated in the Community Integrated Master Plan (CIMP) for relocation of the Bachelor Enlisted Quarters (BEQ), the principal project encompassed by this EIS. On October 25, 2013, CHRS provided Scoping Comments as part of the Environmental Impact Statement (EIS) process for Multiple Projects in Support of Marine Barracks, Washington, DC. Those comments are incorporated in this letter by reference. These comments, submitted on the date shown above, are timely and have been provided by the December 31, 2014 due date.

Summary

Our comments relate primarily to the alternatives for replacing Building 20 at 8th and I Streets, SE. The Proposed Action and Alternatives suggest that the combination of the buildable area, pedestrian standoff, and vehicular standoff for the BEQ would occupy 100 percent of each of Sites A, B, C, and D, and a portion of Site E. If this is correct, then any buildings now on these sites would be demolished to build a new BEQ. Sites C, D, and E are the best-suited for the new BEQ.

Site A (Squares 929, 930 and L Street, SE)

Site A is within the Capitol Hill Historic District and contains 14 historic buildings that contribute to the character of the historic district. But the map distributed at the December 1 meeting fails show these buildings as "historic," a serious error that must be corrected in order to

support a sound decision-making process. If the BEQ were to be built on Site A, all of these historic, contributing properties would be demolished, a huge blow to historic Capitol Hill and to the historic neighborhood immediately north of the Latrobe Gate that demonstrates the character of the community that housed and served those who worked at the now historic Navy Yard. Based on the total site parameters for Site A, there would be no way to avoid or minimize this demolition, and given the scope and wholesale loss of 19th-century structures, there could be no meaningful mitigation for their destruction. Using Site A for the BEQ would adversely affect the integrity of location, design, setting, materials, workmanship, feeling, and association. It would also comprise a change in the use of these squares, which are now limited to individual residences and small commercial uses, and would introduce a new large, tall building that would overwhelm the remainder of the historic district below the freeway. In addition, using Site A for the BEQ would adversely affect the L'Enfant Plan by closing a block of L Street, part of the Plan's original street grid. Public access to Virginia Avenue Park could become quite limited by locating the BEQ on Site A.

Site A is also within the Eighth Street Southeast Overlay Zone (98-11), which limits building height to 45 feet "in order to maintain a compatible scale with older, continuing buildings." The DC Zoning Commission also stated that the 45' height limit "will keep the height profile of new buildings relatively low, thereby respecting the scale and historic character of the adjacent Navy Yard buildings, and also the scale of the continuing buildings in the overlay zone."¹ In the June 22, 1999, Map Amendment, the Zoning Commission further stated that "increasing the allowable height...to 65 feet would dwarf the existing buildings at the Navy Yard directly across M Street" and said that one objective regarding the 4-block area included establishing "height restrictions which are sensitive to the existing built context to the north and south." None of the massing concepts shown at the scoping meeting are sensitive to the existing built context to the north and south.

Site B (Square 976 and a portion of L Street, SE)

Site B is immediately adjacent to the Capitol Hill Historic District. Under Section 106 of the National Historic Preservation Act, the Marine Corps must consider whether the new BEQ at this site would have an adverse effect on the historic district's integrity, including its integrity of location, design, setting, feeling, and association. While Site B is not literally within the historic district, but is instead in its southeast "notch", placing the BEQ here would dramatically change the historic district's setting and introduce a highly incompatible visual element that would loom over the small-scale, low-rise historic district. It would also adversely affect the historic L'Enfant Plan by closing L Street, part of the Plan's original street grid, and would reduce access to the eastern end of Virginia Avenue Park, which is also a contributing property in both the Capitol Hill Historic District and the L'Enfant Plan.

¹ Final Report: Eighth Street, SE Map Amendment and Overlay Zone (98-11), March 8, 1998. See 11 DCMR 1309.

Site C, inside the Washington Navy Yard

Site C is mostly vacant, with the exception of a small building (199) identified as not historic. To the best of our knowledge, Site C appears to have the least likelihood of having effects on historic structures or districts, and the height and massing of the envisioned BEQ would be better suited in the context of the taller, larger buildings being constructed in this vicinity.

Site D, inside the Washington Navy Yard

Site D might allow for a five-story BEQ building; however it would require demolition of a building identified as historic (169).

Site E, at MBW Annex

The new BEQ might be built on a vacant area at the MBW Annex. This location might be very suitable for the BEQ. However, as with Site B, the BEQ at Site E would have an effect on the Capitol Hill Historic District, but it is too early to say whether the effect would be adverse or not.

Communication

Please notify CHRS by mail and also by email, at the addresses shown above (caphrs@aol.com), concerning all future meetings and actions in connection with this project. Also, please send CHRS a hard copy of the draft EIS at the address shown above.

Conclusion

Thank you for considering our comments. CHRS looks forward to continuing to participate in the environmental and Section 106 reviews for this project.

Sincerely,

Lisa Dale Jones

President

cc:

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