

CAPITOL HILL RESTORATION SOCIETY



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October 25, 2013

William Sadlon
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by USPS and email to mbweis@cardnotec.com
and William.sadlon@navy.mil

Subject: Scoping Comments for the Environmental Impact Statement and Section 106 Review for Multiple Projects in Support of Marine Barracks, Washington, DC

Dear Mr. Sadlon:

Thank you for your email of October 17, 2013, notifying persons who attended the September 24, 2013, scoping meeting (which included a representative of the Capitol Hill Restoration Society) that the original closing date for submitting Scoping Comments of October 7, 2013, had been extended due to the partial federal government shutdown to a new closing date of October 25. These comments, submitted on the date shown above, are timely and have been provided by the October 25 closing date.

The Capitol Hill Restoration Society (CHRS) appreciates the opportunity to provide Scoping Comments as part of the Environmental Impact Statement (EIS) process for Multiple Projects in Support of Marine Barracks, Washington, DC. The Marine Corps is our oldest, most valuable neighbor on Capitol Hill. CHRS participated in the Community Integrated Master Plan (CIMP) for relocation of the Bachelor Enlisted Quarters (BEQ), the principal project encompassed by this EIS, and commends the Marine Corps for that outstanding effort to involve the Capitol Hill community in the planning process. CHRS appreciates this current opportunity, through the federal environmental and historic preservation review processes, to share with the Marine Corps and other involved agencies and organizations its concerns about the many impacts this project would have on the Capitol Hill community and the Capitol Hill Historic District. As the oldest and largest civic organization on Capitol Hill and one of the largest in the city, CHRS is committed to preserving the historic fabric and character of Capitol Hill and protecting its neighborhoods, environment, cohesiveness, and residential nature.

We have numerous concerns about the number, gravity, and scope of the environmental and preservation impacts the project would have on Capitol Hill residents, neighborhoods, historic and natural resources, and businesses.

Summary

CHRS agrees that the new Bachelor Enlisted Quarters (BEQ) and other projects included in this EIS are needed to address the needs of the Marine Barracks Washington. Due to the lack of any information related to most of these projects – especially the longer-term projects and work involving landscaping, maintenance, and interior renovations to Buildings 7 and 8 at the MBW Main Post – our Scoping Comments are by necessity limited to impacts of the BEQ.

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. If this is correct, then any buildings now on these sites would be demolished to build a new BEQ on any of these sites. Site A (Squares 929, 930 and L Street, SE) is within the Capitol Hill Historic District and contains historic buildings. Site B (Square 976 and a portion of L Street, SE) is immediately adjacent to the Capitol Hill Historic District. If the BEQ were to be built on either Site A or Site B, the Capitol Hill Historic District would be adversely affected not only by the wholesale destruction of historic buildings, but also the insertion of a massive, tall building completely out of scale for the historic district that would dwarf the surrounding buildings and loom over Virginia Avenue Park. Many residents and businesses would be displaced. In addition, selection of Site A or Site B would destroy part of the L'Enfant Plan for the City of Washington by permanently closing parts of L Street, SE. CHRS urges the Marine Corps to focus on Site C (Square 853) or Site D (within the Washington Navy Yard), both south of M Street.

Historic and cultural resources

The suggested Area of Potential Effects (APE) is rich in historic and cultural resources. Please see the National Register of Historic Places Registration Form: Capitol Hill Historic District (boundary increase) (2003) (copy attached). The Registration Form discusses the historic, architectural, and cultural significance of the portion of the historic district south of the freeway, including Squares 929, 930, and Virginia Avenue Park. This area – the southernmost part of what was known historically as Navy Yard Hill – is one of the oldest neighborhoods in the entire city and developed north of the Navy Yard beginning in 1799. When the Navy Yard began transitioning in the 1830s from primarily building ships to manufacturing ordnance, large numbers of skilled workers were needed. Buildings for shops and houses were constructed to house and serve these workers, expanding Navy Yard Hill. Square 929 contains two pairs of identical, and unusual, brick duplexes built back-to-back in 1887. Square 930 has some of the oldest buildings on Capitol Hill; the five that were constructed before the Civil War includes one that pre-dates 1824.

The APE lies wholly within the area encompassed by the L'Enfant Plan for the City of Washington – which is listed in the National Register of Historic Places – and has the potential to adversely affect numerous historic properties, including the Washington Navy Yard Historic

District and iconic Latrobe Gate; the Marine Barracks and Marine Commandant's House; the Navy Yard Car Barn (also known as the Blue Castle), which is individually landmarked; the Capitol Hill Historic District; and other structures and reservations that are historic. These include such individually listed historic structures as Carbery House (c. 1813), 423 6th Street, SE; Ebenezer United Methodist Church, 4th and D Streets, SE; The Maples (1795-96), 619 D Street, SE; Christ Church (1807), 620 G Street, SE; St. Paul AUMP Church (1924), at 4th and I Streets, SE; and the Old Naval Hospital (1865-66), 921 Pennsylvania Avenue, SE.

Building the BEQ on Site A or Site B would present grave threats to Capitol Hill.

Site A (Squares 929 and 930) is inside the Capitol Hill Historic District, which is listed on the National Register of Historic Places, and contains fourteen historic buildings, including some of the oldest in the historic district. If the BEQ were to be built on Site A, all of these historic, contributing properties would have to be demolished, a huge blow to historic Capitol Hill that would punch a big hole in the historic district. Indeed, demolishing so much of the southern part of the historic district would seriously compromise the integrity of this southern portion, which CHRS worked hard to add to the historic district in order to protect it from just this kind of damage. It would be a deeply regrettable irony for the Marine Corps to visit such devastation on historic Navy Yard Hill, which served personnel of both the Navy Yard and the Marine Barracks.

Based on the total site parameters shown 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 create a huge, 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." Final Report: Eighth Street, SE Map Amendment and Overlay Zone (98-11), March 8, 1998. See 11 DCMR 1309. 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. The Overlay Zone does not apply to the Navy Yard itself.

Site B (Square 976) 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 L'Enfant Plan by closing L Street, part of the Plan's original street grid, and reduce access to the eastern end of Virginia Avenue Park.

At both Site A and Site B, the scale and massing of the BEQ concepts, particularly the eight-story and nine-story versions, are incompatible with the Capitol Hill Historic District. The buildings are too tall and too massive – whether at five, eight, or nine stories – in such close proximity to the two- to three-story historic buildings, including the Navy Yard Car Barn. The massing studies resemble run-of-the-mill chain hotels that would overwhelm the nearby historic buildings and are incompatible with the historic district. On the other hand, with modifications, these concepts might be compatible with taller office buildings within the Navy Yard (Site D) or the Southeast Federal Center (Site C).

If a hotel chain attempted to acquire Site A or Site B, destroy entire squares of historic buildings, and replace them with such incompatible hotels, there would be no question that the hotel chain's attempt would fail because the buildings would either be in a historic district, in the case of Site A, or, in the case of Site B, would overwhelm and compromise the integrity of the adjacent historic district. Although the Marine Corps is a well-loved and respected neighbor in the Capitol Hill Historic District, any attempt on the part of the Marine Corps to destroy historic buildings or compromise the integrity of this historic district by using these sites should also be rejected, and for the same reasons. Site C and Site D offer opportunities to meet the needs of the Marine Corps while protecting the historic Capitol Hill neighborhood. In addition, as far as we know, selection of Site C or Site D would not displace residents or businesses.

Site C is difficult to visualize using the Proposed Action and Alternatives slide/page, even when supplemented by Google maps. This site is west of Isaac Hull Avenue, the westernmost street in the Navy Yard, and is bounded by M Street on its north, Tingey Street on its south, and 4th Street on its west. Site C appears to have low buildings parallel to M Street and a structure on its eastern edge, all hidden from view from M Street by a brick wall. In order for the community to participate effectively in the EIS, additional information is needed to understand the origin, function, and conditions of these structures, as well as photographs of the front, rear, and sides of these buildings. These should be easily obtainable from GSA's inventory of structures and sites at the Southeast Federal Center. 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 Navy Yard, might allow for a five-story BEQ building. To evaluate the effects of locating the BEQ here, we would need to know whether the BEQ would replace the four-story

buildings inside the Navy Yard near 11th and M Streets, SE, and how locating the BEQ here might affect the Navy Yard Historic District.

It would be helpful to know which of the three conceptual massing studies would best comport with the configurations of Sites A, B, C, and D.

The BEQ project may also pose direct or indirect risks to historic public parks within the APE: Eastern Market Metro Plaza; Marion Park (Reservation 18); Virginia Avenue Park (Reservation 126); and other parks including Reservations 122, 123, 124A, and 251. The proposed Virginia Avenue Tunnel project, if approved, would result in trenching through and staging construction equipment in a large area of Virginia Avenue Park, causing substantial damage to the park. CSX has pledged to restore the park to its pre-construction condition. Assuming restoration of the park is needed and does occur, the park must not be damaged yet again as a result of constructing the BEQ. These parks are contributing properties in both the Capitol Hill Historic District and the L'Enfant Plan that now include green space, picnic areas, and a community garden. In addition, it is unclear from the graphic whether Site B, if selected, would take part of Virginia Avenue Park. If so, that would comprise additional damage to a contributing property in the Capitol Hill Historic District and the L'Enfant Plan. However, the Proposed Action and Alternatives states that the site selected must not currently provide or be expected to provide public services for DC residents, including public recreation services. It is unclear how the graphic for Site B relates to this statement.

CHRS agrees that the EIS must study all the topics listed under transportation, socioeconomic, natural resources, air quality, water quality, cultural resources, land use, public services and safety. Constructing the BEQ on Site A would have socioeconomic impacts on Barracks Row Main Street, which includes the portion of 8th Street that would be directly impacted. The Lower 8th Street area is struggling to become revitalized and once again economically viable, and a major construction project at either Site A or Site B would cause an inordinate delay for these efforts. Also, any large construction project such as this has potential for numerous impacts on the Anacostia River and its watershed.

Planning and coordination with other nearby projects and initiatives

There are a number of current and projected construction projects in the project vicinity, including the DC Water Combined Sewer Overflow Control projects, the 11th Street Bridge project, the Virginia Avenue Tunnel project (near Site A and Site B), the South Capitol Street Corridor and Bridge Project, and the Barney Circle/Southeast Boulevard Project near Site B. We and many others in the community are concerned about how coordination of multiple large projects and potentially conflicting construction plans and timetables are going to play out in our community and historic district.

Environmental justice

The Hopkins Apartments, a public housing project located at 12th and K Streets, SE, and the Capper Senior Apartments at 900 5th Street, SE, are in the immediate vicinity of the project area. Environmental review must address any environmental justice issues that could spring from the

project and identify measures and commitments to address any potential problems like noise, dust, air quality, construction staging, and other relevant issues.

Communication

Given the scope of the project and its impacts on the community, we recommend full and frequent communication with the community. This should include not only conveying information to the community, but also conducting a meaningful dialog between members of the community and the Marine Corps that provides public forums for asking questions and providing answers. The CIMP process was very helpful and should be re-started. This needs to happen during project review, throughout construction, and for a designated period of time following construction. We also recommend a website and/or hotline for reporting problems and communicating solutions and ongoing project developments.

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. It is especially important to send CHRS notifications by email because CHRS did not receive the hard copy letter dated September 6, 2013, concerning the September 24, 2013 scoping meeting until September 23, 2013. We are a volunteer community organization with a part-time office manager and a post office box, so notifications need to be emailed to us as soon as possible. CHRS had less than 24 hours to find a representative who could attend the September 24 scoping meeting about a major project in our community, which meets neither the intent nor the spirit of Section 106 and NEPA.

Also, please send CHRS a hard copy of the draft EIS at the address shown above.

Conclusion

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

Sincerely,

Janet Quigley
President

Attachment;

National Register of Historic Places Registration Form: Capitol Hill Historic District (boundary increase) (2003)

cc:

Project website:

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