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May 15, 2015

Ms. Catherine Childs                      by USPS and email to mbwsection106@mbweis.com  
MBW EIS Project Manager  
1314 Harwood Street, SE  
Building 212  
Washington Navy Yard  
Washington, DC 20374-5018

Subject: Draft Environmental Impact Statement and Section 106 Review for Multiple  
Projects in Support of Marine Barracks, Washington

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 Draft Environmental Impact Statement (DEIS). 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, and on December 31, 2014, provided comments for review under Section 106 of the National Historic Preservation Act. These comments, submitted on the date shown above, relate to the DEIS and the section 106 review, which we understand is ongoing. These comments have been provided by the May 26, 2015 due date.

## **Summary**

Our comments relate primarily to the alternatives for replacing Building 20 at 8th and I Streets, SE. If Site A or Site B were selected for the new BEQ, 100 percent of Site A and Site B would be occupied by the new BEQ, with AT/FP pedestrian standoff extending out 33 feet, and AT/FP vehicular standoff at 66 feet, to the outer edge of each site. DEIS Figure 2.4.1, Figure 2.4.3. As a result, all buildings on Site A and Site B would be demolished, to be replaced by a massive five-story building and standoff at Site A, or by a nine-story building and standoff at Site B. In addition to the loss of historic buildings, all of the current and potential businesses at Site A, which serve Marines, Washington Navy Yard (WNY) workers and the community, would be lost, replaced by a dead zone. At Site B, a new multi-function facility for the Washington Humane Society would be lost, replaced by dead zone. For these reasons we strongly urge that neither Site A nor Site B be selected for the new BEQ. As discussed below, there are significant disadvantages to Site C, and for these reasons **we urge the Marine Corps to select either of the federally-owned Sites D or E 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. 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 19<sup>th</sup>-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. 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-foot height limit "will keep the height profile of new buildings relatively low, thereby respecting the scale and historic character of the adjacent WNY buildings, and also the scale of the continuing buildings in the overlay zone." 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 WNY 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." The massing for a BEQ at Site A is not sensitive to this context.

In addition to the loss of historic buildings, selection of Site A would destroy small businesses serving the Marines, WNY workers, and the Capitol Hill community as a whole. Several of these businesses are long-established such as Fuller's Barbershop, and Bachelors Mill (a bar serving the gay African-American community). Grant Associates, a job-placement firm, serves its clients at 810 Potomac Avenue, SE. A leasing agent is actively seeking commercial tenants for 810 Potomac Avenue. Lower 8th Street, SE is already a one-sided retail strip, a disadvantage for retailers. Selecting Site A would exacerbate this disadvantage by lengthening the expanse of one-sided retail. NOVO is developing the apartment building at 816 Potomac Avenue, SE into 55 condominiums, bringing new residents to Capitol Hill, and new customers to Barracks Row businesses. If Site A is selected, all these historic buildings, together with all businesses and residences would be lost, and Site A would become a dead zone.

**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, 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, a nine-story building and security perimeter 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. Final Report: Eighth Street, SE Map Amendment and Overlay Zone (98-11), March 8,1998. See 11 DCMR 1309.

In addition, the Washington Humane Society (WHS) has acquired part of Site B to use in consolidating all its programs, a vital service to people and animals in Washington. WHS plans a Community Animal Care and Education Center, an energy-efficient, LEED-certified facility for animal sheltering, veterinary care (routine, emergency, and spay-neuter), behavioral and medical care and rehabilitation, and adoptions. The WHS facility would offer intern opportunities to veterinary students, who would live onsite. WHS also plans retail (e.g., pet supplies, grooming, and a cafe). WHS would bring needed services for Capitol Hill residents, and 24-hour per day activity to this section of lower 8th Street, SE. For these reasons, Site B should not be selected for the new BEQ.

**Site C, M Street, SE, adjacent to the Washington Navy Yard**

Site C is mostly vacant, with the exception of a small building (199) identified as not historic. However, Site C is part of the Southeast Federal Center Master Redevelopment Plan for the Yards, an agreement between the General Services Administration and Forrest City for rehabilitating historic buildings and constructing new office and residential buildings. DEIS 2-23-2-24. Site C, on the eastern edge of this area, would bifurcate a planned residential project, and interfere with the redevelopment plan. For these reasons, we believe that Site C is not a desirable site for the BEQ.

**Site D, inside the Washington Navy Yard**

Site D would allow for a five-six story BEQ building, in an area of the WNY designated for redevelopment in the WNY Master Plan approved by the National Capital Planning Commission in 2014. DEIS, 2-25. This location, on federally-owned land, appears very suitable for the BEQ.

**Site E, at Marine Barracks Washington Annex**

The new BEQ might be built on a vacant area at the MBW Annex. This location, on federally-owned land, also appears very suitable for the BEQ. The DEIS mentions the 6th Street, SE view shed as a potential disadvantage of Site E. DEIS, 2-27.

Constructing the new BEQ on Site E will not adversely affect this view shed. Sixth Street, SE is already blocked on the north by the SE/SW Freeway and south of the freeway, extends only to K Street, SE, where it terminates. Because the freeway and the MBW Annex already block this section of 6th Street, there is very little to see already, and the new BEQ on Site E would not have any adverse effect on this restricted view shed.

**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.

**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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