HISTORIC PRESERVATION REVIEW BOARD
REVIEW OF SMALL-AREA PLAN

Landmark/District:	**Saint Elizabeths Hospital**	(**x**) Agenda
Address:	**2700 Martin Luther King Jr. Avenue, SE**	
Meeting Date:	**April 26, 2012**	
Staff Reviewer:	**Tim Dennee**	

The Government of the District of Columbia requests the Board's and the public's comment on a draft small-area plan for the redevelopment of much of the East Campus of Saint Elizabeths Hospital. The plan has been released for a 30-day public comment period. The "illustrative concept plan" is not developed to a level of specificity for a Board action on a concept or permit application pursuant to the preservation law. The purpose of this review is to familiarize the Board with the plan and with the campus itself in order to anticipate any potential issues for future project reviews.

Excerpts from the master plan have been enclosed for the Board's review, but the entire 227-page text is available at http://www.stelizabethseast.com/document-center/. It consists of background, drawings, design guidelines, information on sustainability strategies, etc. Although the graphics are meant to suggest what may be built, the roadways and the parcels described by them are likely very close in configuration to the eventual site plan.[1] The master plan proposes new construction, some demolition and relocation of both contributing and non-contributing structures, rehabilitation and reuse of others, the further opening up of the campus, and the construction and widening of streets. It contemplates a variety of uses for the site, including retail, hotel, and service-commercial, office, educational/institutional, and residential. There is a fair amount of detail about the proposed uses and character of each precinct of the campus. The northernmost portion of the project area, where the remaining agricultural buildings stand, may be an appropriate site for urban agriculture, given its historic use and isolated location.

Historical background

The plan (and the historic district brochure and historic district nominations) goes into more detail on the history of the campus, but the property west of Martin Luther King Jr. Avenue ("MLK") was purchased by Congress in 1852 as the site for a hospital for the treatment of the mentally ill of the District of Columbia and of the nation's armed forces. The first section of the huge Center Building opened in 1855. The siting and architecture of this and the later buildings reflect the evolution of thinking about mental health care. For decades, the hospital was at the forefront of research and treatment in the field. Among the treatments at this formerly rural

[1] The creation of an overall site plan is likely to be one of the first steps in order to impose zoning categories on the campus and bound them.

property was a sort of occupational therapy—agriculture—that also served to make the institution more self-sufficient. It was for the purpose of expanding the farmland and pastures that the present East Campus was purchased in 1869. It was not until 1902 that the East Campus saw new residential and treatment buildings not related to the agricultural use. But treatment and research facilities crowded out the farm by the 1950s.

In the 1980s, the federal government transferred to the District of Columbia the East Campus and the responsibility for operation of the mental hospital. The transfer deed and a contemporaneous memorandum of agreement (MOA) require the District to preserve certain historic buildings and associated landscape. In recent years, the District has constructed on the East Campus a new hospital building and a "unified communications center." Neither of these properties is included in the present master plan.

The entire property—East and West Campuses—was listed in the National Register of Historic Places in 1979. It was elevated to a National Historic Landmark in 1990 and designated a District of Columbia historic district in 2005. The period of significance is 1852-1945. In 2010, the Board reviewed a concept for a water tower to stand on the East Campus, north of the new hospital building.

At present, the General Services Administration (GSA) is planning and building a headquarters for the Department of Homeland Security on the West Campus. Construction commenced with a Coast Guard headquarters. To relieve the West Campus of some of the anticipated bulk of the entire project, it was agreed that a Federal Emergency Management Agency (FEMA) headquarters would be placed on the East Campus, at the location of the Dorothea Dix Pavilion (Building 120).

The federal project will affect the East Campus in other ways, too. It requires a number of transportation improvements, including better access to and through the East Campus. GSA intends to widen MLK to provide more capacity for employees, contractors and visitors and to permit turns into both campuses. The widening of the avenue will require removal or relocation of the iron perimeter fence and a couple of buildings.[2]

Review authorities

The most complicated aspect of the campus redevelopment is the several legal authorities under which development at Saint Elizabeths will be reviewed for consistency with the character of the historic campus.

- Any federal projects, including the widening of the avenue and the design and construction of the FEMA compound, are reviewed pursuant to the regulations implementing Section 106 of the National Historic Preservation Act, i.e., historic preservation review of undertakings of executive-branch agencies. The transportation improvements within the District-owned East Campus have also been the subject of a

[2] The likely adverse effects of the widening of the avenue have been the subjects of a public consultation pursuant to Section 106 of the National Historic Preservation Act and a recent programmatic agreement that concluded that consultation.

Section 106 consultation, because a portion of the road work may ultimately be funded by the Federal Highway Administration.

- The conveyance of the East Campus to the District in 1987 required Section 106 review because of the potential adverse effects of transferring a historic property out of the custody of the federal government. The deed itself incorporated the provisions of a memorandum of agreement that passed on the responsibility to "preserve, rehabilitate, and maintain, in accordance with the provisions of the National Historic Preservation Act… and its implementing regulations" (i.e., to the Secretary of the Interior's Standards for Rehabilitation) the East Campus cemetery, all the buildings listed as contributing in the National Register nomination, and "all landscaping and greenspace associated with these structures." The agreement set up a process by which all "plans and specifications for the rehabilitation of, or new construction at or adjacent to, or temporary or permanent abandonment of, the historically significant components set forth above will be submitted to the District of Columbia HPO and the [Advisory] Council [on Historic Preservation] for review and approval prior to implementation" for a 30-day review. If either of the agencies cannot agree with the plans, a public consultation, in the manner of 106 reviews, would be necessary to resolve the disagreement.[3]
- As the entire campus was more recently designated a District of Columbia historic district, permit applications are subject to review by the Historic Preservation Office and by the Historic Preservation Review Board as appropriate. By statute, rehabilitation and additions must be compatible with the character of the historic district. New construction must not be incompatible with the character of the district.
- The local preservation law also requires Historic Preservation Office review of District government projects for any potential effects on historic properties. Until properties are sold or leased to private entities, campus projects are subject to this provision, but any of the three aforementioned reviews is sufficient to satisfy this requirement.

Road improvements

The District's Department of Transportation has developed a site plan for a roadway network consisting of new roads and alterations to existing ones. As mentioned above, this project is undergoing a Section 106 public consultation, nearly complete, because it is anticipated to use federal funds for at least some of the work. Its aims are to improve movement through the campus by widening streets and sidewalks and by making some alterations to alignments to eliminate difficult intersections. The campus street plan would make new connections to 8th, 12th and 13th Streets in Congress Heights. A widened and partly realigned Sycamore/Dogwood Street route in front of the campus's major buildings and a new 13th Street at the rear of the project area (i.e., to the east, along the ravine) would become the principal collectors. There would be extensions of Sycamore, Pecan and Cypress Streets and additional connections from the new 13th Street to the area of the "Continuing Treatment" oval (encompassing Buildings 106-112). These streets effectively parcelize the campus.

[3] The development of the master plan has been the subject of a public consultation pursuant to the deed restriction and 1989 MOA with the intention that larger-scale issues might be anticipated and resolved in preparation for future, more developed site/building plans.

The campus roads would be widened to have right-of-ways ranging from 58 to 90 feet wide. The hierarchy of widths is based on the anticipated traffic on each street and the need to confine the roads between existing buildings. The widest road would be the new 13th Street extension the widest, as it would serve the greatest number of large buildings, including acting as a shuttle route to the FEMA compound. Of course, situated behind all of the contributing buildings, it would have a relatively minor impact on the character of the property overall.

The principal effect of the road work is upon the setting of historic buildings, cutting into their yards, increasing the ratio of paved area to green space, and removing some trees and shrubs.

The road work requires the demolition of several non-contributing buildings. The main, direct, physical impact to historic resources is the extension of Sycamore Street through Building 88, the Blackburn Laboratory. Blackburn Lab is one of the most important buildings on the East Campus because of its role in the hospital's work on brain physiology and pathology. Therefore, in order to carry out the road project, Blackburn will be moved to the northwest outside corner of the "Maple Quadrangle," between Buildings 89 and 90, and rotated 180 degrees to address Pecan Street.

As the Mayor has proposed infrastructure work at Saint Elizabeths as a substantial budget item, it is likely that some utility work will commence sooner rather than later and would presumably coincide with some of the road work, as much of the utilities would run along the right of way.

Archaeological investigations have been conducted in the areas to be disturbed by road construction, but nothing of significance was uncovered.

- The draft memorandum of agreement allows for minor refinements to the road plan as it develops, to avoid important trees, move paving away from historic buildings, or adjust alignments to better reflect the original road plan. One of these possible adjustments would be to make the Sycamore/Dogwood alignment conform more closely to the existing alignment at their present intersection between Buildings 100 and 110. This would better preserve the oval that bounds the "CT Village," provide more space for development across the street, in the vicinity of Building 117, and eliminate an extended, lopsided, underutilized front yard for Building 100.

Demolition and relocation of structures

Either because of road improvements or for redevelopment opportunities, a number of structures, both contributing to the character of the historic district and "non-contributing" would be demolished.[4] Of the contributing buildings proposed to be razed, the most notable are Buildings 115 and 116, which were a wartime expansion of the Continuing Treatment quad with similar architecture.

All of the 1950s and later buildings may be razed, but the plan leaves open the possible retention of the 1957 chapel which, although technically non-contributing, is something of a visual

[4] The federal undertaking to widen MLK would be responsible for the demolition of perhaps two buildings (one contributing) and the moving of one other.

landmark from MLK and perhaps the building with which the community is most familiar and attached.

A frame staff cottage, Building 99, would be moved eastward along the south boundary to a point next to proposed townhouses and away from the principal retail site.

As mentioned above, the perimeter fence is slated for removal in order to open up the campus, although its removal is likely to be phased, and there are locations, such as at the "farm complex" where the long-term retention of a fence may make practical sense for security or protection from deer. The fence is not considered a contributing element of the campus in any of the designation documents, although portions of it, including many of the gate piers, are from the early twentieth century and are more or less intact.[5] But the whole does affect the character and understanding of the property as a former institutional campus, and so retention of the gateposts should encouraged to signal the historic boundary and gateways, especially at the most important historic entry points and perhaps the new ones, if the piers have to be relocated.

The MLK widening by the federal government will also result in demolition of the brick gatehouse (Building 97) at the former main entrance. An agreement with GSA provides for relocation of the MLK piers and a small, turn-of-the-twentieth-century, frame, workers' cottage or bunkhouse that has been overlooked in the historic designations.

The master plan also contemplates the removal of the passages that now connect the Continuing Treatment buildings in order to open up the interior of that quad. The design guidelines encourage retention of the passages but discuss how they ought to be treated if some are removed as necessary.[6] The plan envisions retaining the connections between the Maple Quadrangle buildings, although it contemplates possible reconstruction for infill to the east.

- Demolitions of contributing buildings are by definition contrary to the purposes of the city's preservation law. Any raze of a contributing building would have to be reviewed by the Board and the Mayor's Agent once application is made for a permit to construct a replacement building. Clearance of the raze application would be contingent on a finding by the Mayor's Agent that the demolition was necessary in the public interest or that failure to issue the raze would result in an unreasonable economic hardship.
- The relocations of structures have been vetted through a public consultation process and appear reasonable or unavoidable. Efforts should continue to ensure that the relocated buildings and gate piers are appropriately re-sited.

Additions and rehabilitation

Additions are more generally addressed in the master plan, but as with other aspects of treatment for the historic buildings, the design guidelines say that some change is acceptable, but the Secretary of Interior's Standards and the compatibility standard must apply. The sector guidelines are more specific about connections and adjacencies between old and new buildings, particularly at the Maple Quad and Building 102. One of the areas of concern and needing

[5] The iron fence replaced previous wood fences. Portions of it were rebuilt in the 1940s and 1970s.

[6] Of course, they may continue to be useful for occupants that have use for more than one of the buildings. And there may be zoning implications to removing connections between buildings on a single lot.

sensitivity is proposed introduction of retail spaces into the Dogwood Street sides of Buildings 108 and 110, because these residential building types do not easily lend themselves to such uses.

The Office of the Deputy Mayor for Planning and Economic Development and the Department of General Services are developing a scope of work to stabilize some of the earliest and most deteriorated buildings on campus, the circa 1902 Buildings 89, 94, 95 and 100.[7]

New construction

The design guidelines address new construction in general terms as well, with some guidance about composition and acknowledging the preservation law's charge that new construction must not be incompatible with the character of the historic district. The plan also suggests maximum heights (expressed in number of stories) and densities, with the latter figured roughly from multiplying the available footprint by the number of stories. It is acknowledged that some massing devices such as upper-story setbacks will be necessary to achieve compatibility to proximate historic buildings.

Parking and loading entrances are to be on the least prominent sides of buildings. Any above-ground parking structures are to be wrapped with other uses.

Architectural expression is left appropriately flexible, although there is language about compatible materials and coloration. With an anticipated decades-long build-out, popular architectural vocabularies, uses and even building technologies are bound to change, so keeping in mind compatibility and flexibility is important.

The plan proposes townhouses along the southwestern boundary of the property, in deference to the small, single-family homes that stand across the boundary. The height maximum for these would be four stories. Because four stories can be an awkward proportion for townhouses, the design of any of more than three stories should consider an expressed attic story for the top floor.

Even considering the loss of green space to new and widened roads, the new construction is proposed to have much less yard area or building setback than the existing buildings. While a zero-lot-line condition is appropriate to the new retail, maintaining flexibility for yards and recesses elsewhere is important for keeping a sense of continuity through the green campus and as old and new buildings address each other across the streets.

Perhaps the most challenging part of the plan is the new construction proposed for the MLK frontage. The master plan for the federal government's West Campus ultimately succeeded because it concentrated the bulk of new construction on the periphery of the campus, instead of within the core, reducing the amount of demolition and unfortunate adjacencies. This put the largest buildings at the back or western edge of that campus. While this created some adverse secondary effects on views to the property from the west, it best preserved the character in the center of campus and the views in from MLK. The present East Campus plan also pushes the new development to the periphery, but to the entire periphery of the project area, including the

[7] Although subject to the 1989 MOA, this work will presumably be reviewed by HPO staff, if compatible, unless it ultimately involves major work, such as an addition.

MLK frontage.[8] Because of the serious economic demands of having to rehabilitate the existing buildings and infrastructure, a significant amount of development is necessary. It has been proposed to be concentrated in tall buildings along the ravine as well as on the likely preferred avenue frontage.

The East Campus buildings and clusters were arranged so that they relate to, and typically face, the campus boundary: the Maple Quadrangle addresses MLK, the CT Quad the southern boundary, and Buildings 115 and 116 Alabama Avenue. Filling in the margins of the campus to some degree is unavoidable, but it is better if these areas are of secondary importance. The most important frontage is MLK; the space between the avenue and Buildings 89, 94 and 95 is essentially the front yard and, although somewhat altered over time, has served as the setting for these buildings since 1902.[9] It also retains the visual connection between the East and West Campus buildings across the avenue. The present master plan proposes three seven-story-tall buildings on the MLK frontage, separated by the Cypress Street entrance and a 250-foot-wide open space meant to serve as a visual corridor. The consequence would obscure the view of the historic buildings and overshadow the two-story 1902 buildings; the public character and appearance of the property would be more defined by the new construction. When new construction is proposed, special attention will need to be given to these viewsheds.

- It should be acknowledged that the placement of large buildings along the MLK frontage is inherently problematic and a departure from the character of the campus. Projects in that location should receive the greatest siting and design scrutiny. The most sensitive portion is the area now bounded by Cypress, Sycamore and Redwood Streets.
- Any four-story townhomes (or two-over-two) designs should consider an attic story that is differentiated from a three-story block below.

Design guidelines

- The Board should consider accepting the design guidelines as generally reflective of their policies for the treatment of historic buildings.

[8] With the exception of the farm complex, which is isolated beyond the FEMA site but has the potential for a pad site near MLK.

[9] Plans were drawn up in the 1930s that proposed potential development in front of the 1902 buildings, but the hospital expansion was instead directed to the Continuing Treatment quad. Not only was the "front yard" or forecourt retained, but the Blackburn Laboratory and chapel were oriented toward it and a summer pavilion located there.