HISTORIC PRESERVATION REVIEW BOARD STAFF REPORT AND RECOMMENDATION

Landmark/District: Walter Reed Army Medical Center Historic District (x) Consent

Address: **6900 Georgia Avenue NW**

Meeting Date: **December 15, 2016** (x) Subdivisions

Case Number: **17-070**

Staff Reviewer: **Tim Dennée** (x) Concept

The applicant, TPWR Developer LLC, a joint venture of Hines-Urban Atlantic-Triden, the master developers of the city-owned portion of the Walter Reed campus, requests the Board's review of a concept to subdivide the campus.

Since the development of the master plan, HPO has encouraged that the skeleton of the plan—the circulation and parcelization—be worked out as feasible in order to anticipate and avoid adverse effects and to influence the particulars of and facilitate the review of each project.

In July 2015, the Zoning Commission approved a number of zoning classifications specific to the campus and very specifically applied to parcels drawn upon a plat which serves as the base map for the present proposal. It would be valuable to consider whether any subdivisions along those lines might be incompatible and, consequently, whether instances of split zoning might be an issue for eventual parcels.

As the Board is aware, a couple of rehabilitation projects are imminent, and they will likely need new lots of record before their permits are issued. Beyond those are other parcels and lots, some boundaries drawn around existing buildings and some around areas to be developed.

The applicant asks you to consider the compatibility of the magenta lines drawn on the map. Further subdivision into lots is partly dependent on the fleshing out the shape of the development in those areas, but it is also held up by the fact that many lots would be nonconforming without presently having frontage on dedicated public streets. With the Board's conceptual approval and delegation, the staff could sign off on the subdivisions shown that are necessary for the rehabilitation projects or for the definition and conveyance of properties by lease. Further subdivision of the parcels, beyond what is considered "minor or insignificant lot changes," must come before the Board pursuant to regulation.¹

Evaluation

Many of the boundaries describe larger parcels where multiple new-construction projects are anticipated to occur. These accord with the master plan and are largely defined by the new and modified street right-of-ways. Most will later be further subdivided as the specifics of the

¹ 10A DCMR § 320.3(a).

developments—mixed-use, townhouses, etc.—are produced by the eventual parcel-holders and as the roadway network is augmented and dedicated.

Other boundaries define single lots upon which new buildings are proposed by the master plan. These include, for instance, the lots for buildings immediately north of Building 1 (and the areas along Georgia Avenue, although the boundaries between these latter lots could change).

As with Buildings 11 and 14, where there are pending projects, the sites of other historic buildings must be bounded in order to separate them from each other, from the new-development, and from circulation and passive recreation areas.

Evaluation

Naturally, it is the last category of subdivision, the bounding of the historic building sites, that is the most important and sensitive.

One observation that could be made about the lines around the historic buildings is that they are often very close to the buildings, perhaps as near as eight feet in some cases. While this is often sufficiently compatible depending on which side of the building, and sometimes unavoidable given the proximity of other buildings, it is sometimes problematic.

It is worth pointing out again, however, that it is the *magenta* lines, and *not* the *black* lines that are *now* being proposed as boundaries, but given the import of the zoning, the black lines will carry more weight later.

HPO would suggest that the following lines are compatible:

- 1. All parcels north of Dahlia Street, with the particulars of development to be named later.
- 2. The lines bounding Delano Hall, Building 11 (Land Bay J.3). The Board reviewed the developing master plan and the school gym addition with the knowledge of the very close western boundary and did not object, because of the intention to construct a new building on Land Bay J.2. It will be the layout of that building and its relationship to Delano Hall that will be the crucial considerations.
- 3. The lines around Building 1 (Land Bay H.1) that extend to Main Drive, 12th Street and the western boundary of the District's property. The northern boundary creates two additional lots, Land Bays N.2 and H.3, that would allow for compatible new construction, as contemplated by the master plan, while allowing the north pavilion of Building 1 to stand free.
- 4. The lines around Building 17 (Land Bay J.4), while close to it, are sufficient for a narrow and very frontal building, likely precluding any incompatible side additions.
- 5. Land Bay J.5, which is just an open redevelopment site whose key concerns would be the aspect of new construction as viewed from Main Drive and Aspen Street, especially in relation to Building 17.
- 6. The lines around Land Bays J.6 and J.7 mainly clarify the extent of land around the noncontributing Building 14, Abrams Hall, without adversely affecting access, etc. The eastern boundary maximizes the recognized extent of the Great Lawn. This parcel combines Abrams with Land Bay J.7, which is a portion of the "special purpose" WR-6 zone (see Item #11 below).
- 7. The lines around Land Bays J.1, J.8 and J.9 which, assuming the western line of the paving of the roadway south from Main Drive (which is not yet fixed), leaves some space in front of the historic buildings. Building 16, immediately behind which the western boundary snakes,

is noncontributing, but it faces south, so it not much affected. A more important question is how the lot lines will ultimately be drawn between the central heating plant, Building 15, and the gas station, Building 82, especially as the latter faces southwest, with a potential lot line placed not far in front of its vehicle bays. A similar question remains as to whether the rectangular lot north of J.9 will actually be created, and what will be its character.

The following areas are presently proposed lines where small adjustments may be required:

- 8. The parcel composed of Land Bays K.1 and K.2 is generally appropriate, assuming, as at Land Bay J.9 across the street, that the right-of-way allows some space in front of the historic firehouse (Building 90 on Land Bay K.2). The eventual boundary around the firehouse will important, too, if the building is to be viable and allow access and perhaps parking. The presently suggested lot also seems to invite wrapping around the firehouse a large building on Land Bay K.1, an issue that the Board recently discussed in the context of review master plan refinements and design guidelines. Most important for our present purpose is the northern boundary of this parcel with that of Land Bays K.3 and K.4. That line is the southern boundary of the latter parcel and does not allow for a proper rear yard (or the present parking) behind the fairly grand general officers' quarters (GOQs), Buildings 9 and 10.
- 9. As for the parcel made up of Land Bays G.2, G.3 and G.6, it contains the historic Building 12 plus the associated monument recalling the "sharpshooter tree" from the Battle of Fort Stevens. The boundary west of Building 12 seems too close to the building, even if the lot beyond it is landscaped (see Item #11 below).
- 10. The parcel containing Buildings 6, 7, 38 and T20 will obviously have to be further subdivided, but as the footprint of future construction is unclear, so are the lines among the buildings uncertain. Recall that the master plan anticipates contributing Building 38 being demolished. A line behind (to the east of) historic Building 7 is necessarily going to be close to the building, in order to fit another Georgia Avenue-fronting building, but perhaps it need not be so close.
- 11. Land Bay G.2, to the west of Building 12; Land Bay K.4, to the west of the GOQs; the Great Lawn and Rose Garden in Land Bay J.1; and Land Bay J.7², south of Abrams Hall (Building 14), are combined as a "special purpose" recreation area (WR-6) in the campus zoning. There, no new surface parking lots are permitted but, subject to historic preservation review,

Temporary structures may be erected to house any temporary use, subject to the temporary use provisions... Up to five (5) permanent structures, of no more than four hundred square feet... each, may be constructed for the general purpose of food and beverage sales, or other retail or service use ancillary to the role of the WR-6 as an open space zone.

The fact that the both the master plan and the zoning call for these areas to remain mostly open space is compelling. Still, in the back of our minds must be the possibility that the allowed uses could somehow be changed over time. The creation of conforming record lots to bound these open spaces could conceivably create the expectation that they could

² The zoning regulations reserve J.7 for "a Parks and Recreation use, or a similar use operated by a non-governmental entity. In Land Bay J.7, any new construction built pursuant to Subtitle K § 906.5 shall be set back no less than twenty feet (20 ft.) from the [present] Aspen Street property line." Construction to an floor-area ratio of 0.5 is permitted there.

be otherwise developed, if the zoning were to change some day. It would be worth considering whether the parcels should be left in the same record lot as an adjacent parcel, but with responsibility for them separated via assessment and taxation lots, plus whatever leases or management/maintenance agreements may be concluded.

As to their boundaries, they are generally compatible. However, even if it is to be open space, the eastern boundary of Land Bay G.2 comes very close to historic Building 12, and it probably should not encompass much of the front yard of the noncontributing Building 6 (Land Bay G.1), unless redevelopment of that spot is to involve a replacement building with a narrower frontage on 12th Street.

Departing from the earlier small-area plan, the master plan and design guidelines have shifted away the notion of a possible new building west of the GOQs (Buildings 8 and 9) in Land Bay K.3. Therefore, the east line of the K.4 open space should be moved further east.

Recommendation

HPO recommends that the Board approve the subdivision in concept and delegate to staff the clearance of subdivisions along the proposed lines, with the conditions that, when actually platted, 1) the line between Land Bays K.1 and K.3 be adjusted to allow some rear yards for the GOQs, 2) the line between Land Bays G.1 and G.2 be adjusted (and the line between G.2 and G.3 and between K.3 and K.4 be adjusted in later subdivisions), and 3) the applicant consider the comments made above regarding further subdivisions of these parcels, particularly of the WR-6 "special purpose" open space areas.