
**HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION**

Landmark/District: **Walter Reed Army Medical Center Historic District** Agenda
Address: **6900 Georgia Avenue NW**

Meeting Date: **June 28, 2018** Raze
Case Numbers: **18-308** Permit

The applicant, EHT Traceries, agent for the long-term lessee and developer TPWR Developer LLC (a joint venture of Hines-Urban Atlantic-Triden), requests the Board's review of a permit to raze Building 38, identified as contributing to the character of the historic district.

Background

In 2014, the Board designated the entirety of the former Walter Reed Army Medical Center a District of Columbia historic district. The same year, the property was listed in the National Register of Historic Places.

Walter Reed Army Medical Center, consisting of little more than the core of today's Building 1, was established in 1909. It was intended ultimately to combine on a single campus an Army general hospital, the Army Medical School, the Army Medical Museum, the Surgeon General's Library, and pathology research facilities. The general hospital grew rapidly with the coming of the world wars, but it was not until the mid-1950s that all these functions had been united on the installation. Thus, the property's period of significance was established as 1909 to 1956. The list of contributing buildings from that period was intended to include the array of treatment and administrative buildings, research and teaching buildings, dormitories, laboratories and support buildings that made up the whole.

The historic district nomination was prompted by the closure of the base, and a public consultation on the topic of the closure and its preservation implications carefully considered the significance and integrity of the whole campus and of the individual structures. For instance, one building dating within the period of significance was determined noncontributing for lack of sufficient historic integrity.

Building 38 stands south of Dahlia Street, facing east. It was constructed in 1922 as the base guardhouse. It received a second story and wings in 1942, with the wartime expansion of the installation, and was then converted to office use. It is not the largest, most prominent, or most significant of the contributing buildings, nor does it have the highest level of historic integrity of them but, like the rest, it was determined by the Board to contribute in its own way to the character and story of the historic district.



The raze was first proposed in the 2012 draft small-area plan for Walter Reed, to make way for a road and a larger building. The Board has no authority to approve or deny small-area plans or campus master plans, but it reviews them for the purpose of anticipating future preservation issues. The September 2012 HPO report pointed out that:

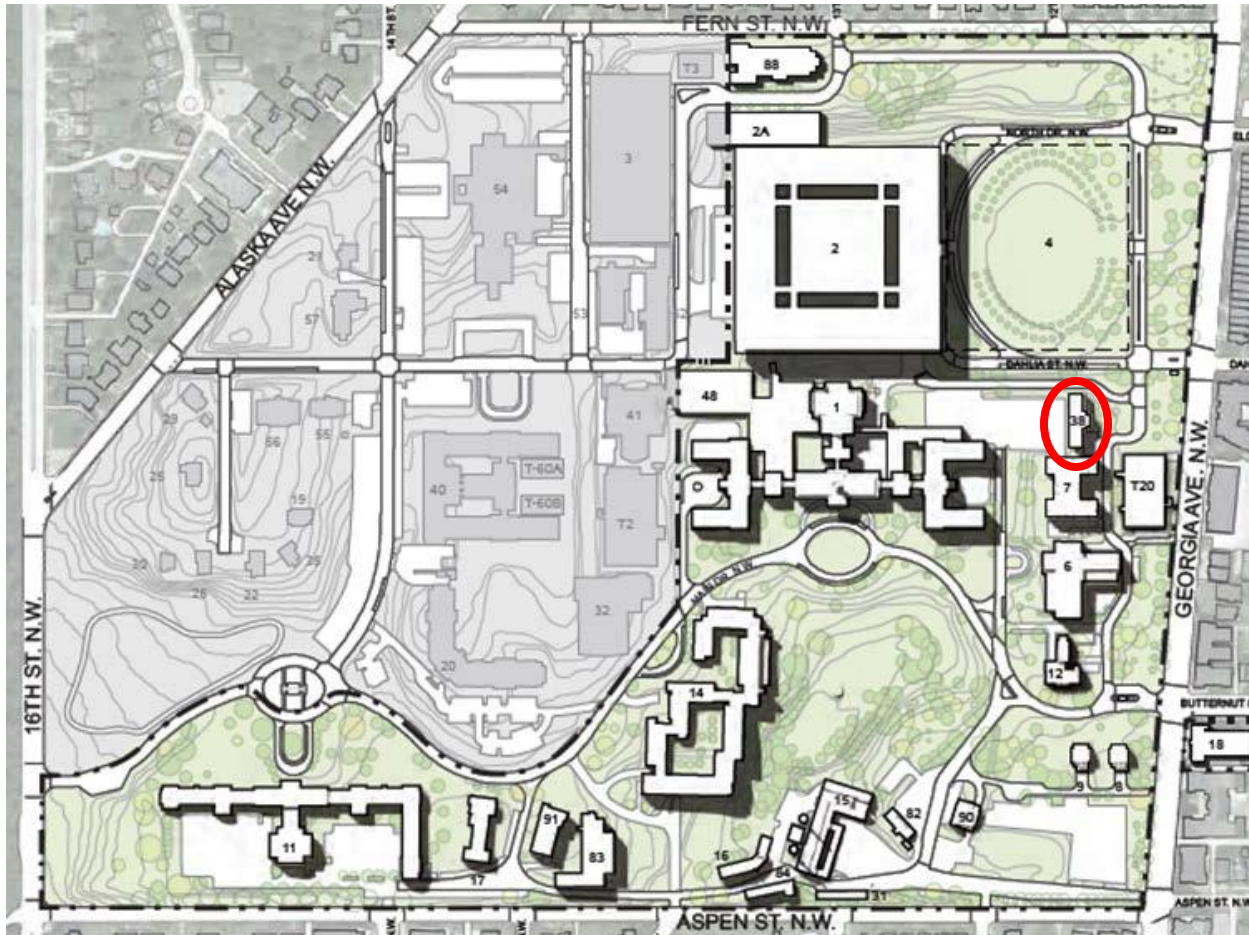
Demolition of the buildings [38, 31 and 84] would be contrary to the purposes of the preservation law and would require the approval of each project of special merit to replace them. As such demolitions are dependent upon the specifics of the project and will not be likely be proposed in the initial phases of development, the Board and the Mayor’s Agent will later have a better opportunity to evaluate the success of the redevelopment and the necessity for such actions.

Similarly, the Board reviewed the applicant’s draft campus master plan in October 2015 and found that,

razing Buildings 31, 38 and 84 is contrary to the purposes of the preservation law, because demolition would fail to retain and enhance three contributing buildings. It is recommended that, if the applicant intends to proceed to the Mayor’s Agent, the applicant develop specific special-merit projects for the reuse of those building sites.

Evaluation

As stated above, razing contributing buildings fails to retain and enhance them or to adapt them to new uses, and it is therefore contrary to the purposes of the preservation law (D.C. Official Code § 6-1101(b)(1)(A)). Their removal harms the integrity of a historic district. Sanitizing this property of its utility buildings diminishes our understanding if the development and use of the site. Unless there were a compelling reason for the reassessment and categorization of a building as “noncontributing,” the Board would have to recommend against demolition as inconsistent with the law’s purposes.



The Mayor's Agent

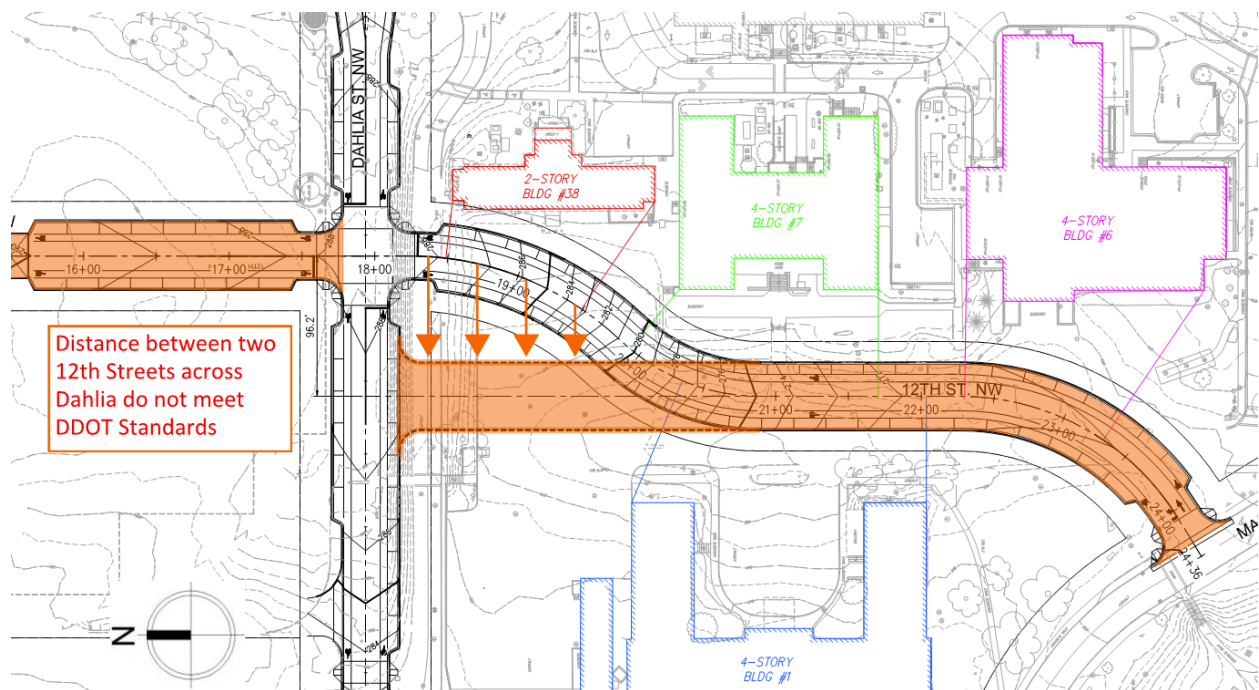
Following a recommendation against razing Building 38, the applicant would be able to request a hearing of the Mayor's Agent. There are three grounds upon which the Mayor's Agent may order an outcome different from that recommended by the Board. First, the Mayor's Agent may find that the Board was simply incorrect—that something recommended for denial is, in fact, consistent and compatible. Of course, the Mayor's Agent has tended to give deference to the Board as the appointed expert body on preservation. Second, the Mayor's Agent may find that the failure to issue a permit will result in unreasonable economic hardship to the owner, a term that is narrowly defined in the law. Third, the Mayor's Agent may find that incompatible alteration, demolition, subdivision or new construction is necessary for the construction of a project of special merit. This is the claim most often made in Mayor's Agent's proceedings.

The preservation law defines special merit as “a plan or building having significant benefits to the District of Columbia or to the community by virtue of exemplary architecture, specific features of land planning, or social or other benefits having a high priority for community services.” (D.C. Official Code § 6-1102(a)(11)) The Board has no role in assessing “social or other benefits,” but its review of buildings and site plans touches upon the qualities of architecture and the features of land-use planning. The Mayor's Agent's hearing is a *de novo* review, because the Mayor's Agent can consider matters beyond strictly compatibility. Yet, the Mayor's Agent may rely upon the record of a Board hearing to inform his decision. The evidence presented is useful for the inquiry into the question of whether a special-merit project is

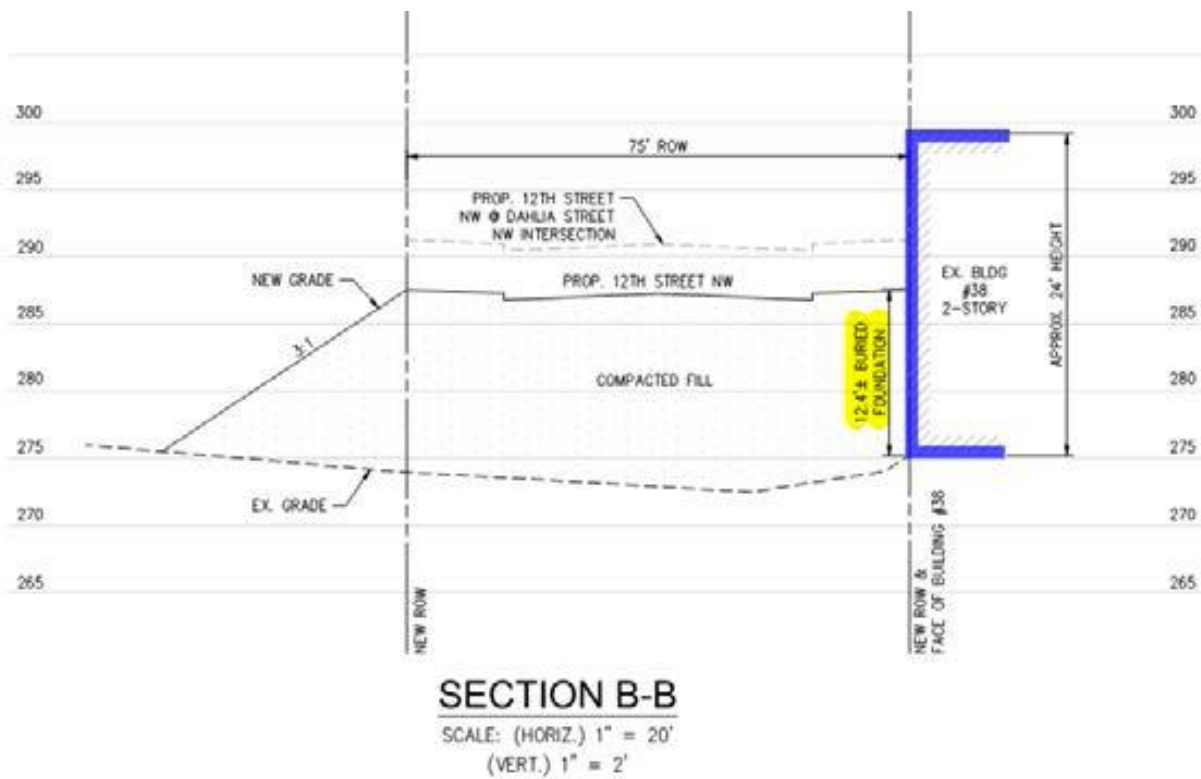
necessary, i.e., whether the project has feasible alternatives that could avoid serious adverse effects. But first there must be an actual project that may necessitate such effects.

The law states that, “In those cases in which the Mayor finds that the demolition is necessary to allow the construction of a project of special merit, no demolition permit shall be issued unless a permit for new construction is issued simultaneously under section 3 of this act and the owner demonstrates the ability to complete the project” (D.C. Official Code § 6-1104(h)). This supposes a full-fledged project.

A project has now been submitted (see the associated concept application for road improvements in the vicinity). The applicant’s presentation indicates that a road realignment necessitates the raze of Building 38, because a smoothly sloped and curved 12th Street running south from Dahlia would require considerable filling at the north end and rear of the structure.



In its 2015 review of the campus master plan, the Board supported the idea of such a realignment, with the caveat that demolition of an adjacent contributing building would be an issue. As can be seen from the drawing above, the northwest corner of Building 38 would fall within the east line of the proposed 12th Street right-of-way. Of course, this does not mean that any paving would extend that far; it is the re-grading that poses the challenge. Piling soil against the walls of the building would certainly endanger it. There is the alternative of constructing retaining walls to avoid additional loads against the structure itself. These would reach a height as much as a story tall near the building, leaving little space for an areaway between them and a sidewalk.



The campus roadway realignments require some further development, to better illustrate their effects on the historic buildings expected to remain. The vicinity map shown in the present plans depicts 12th and Dahlia, as well as Elder, but the details focus on just the 12th and Dahlia intersection. The plans do not address road improvements elsewhere, including 13th Street, Main Drive, etc.

Recommendation

HPO recommends that the Board find that clearance of a permit application to raze Building 38 is inconsistent with the purposes of the preservation law, because its demolition would not retain, enhance or adapt this contributing building to the historic district.

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