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

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

Meeting Date: **August 1, 2019** (x) Razes
Case Numbers: **19-455 and 19-456** (x) Permits/concept

The applicant, the Office of the Deputy Mayor for Planning and Economic Development, requests the Board’s review of permits to raze two buildings—31 and 84—that are identified in the Walter Reed historic district nomination as contributing to the character of the historic district. The raze applications appear related to the proposed widening of Aspen Street into the campus, which has been submitted for concept review.

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.

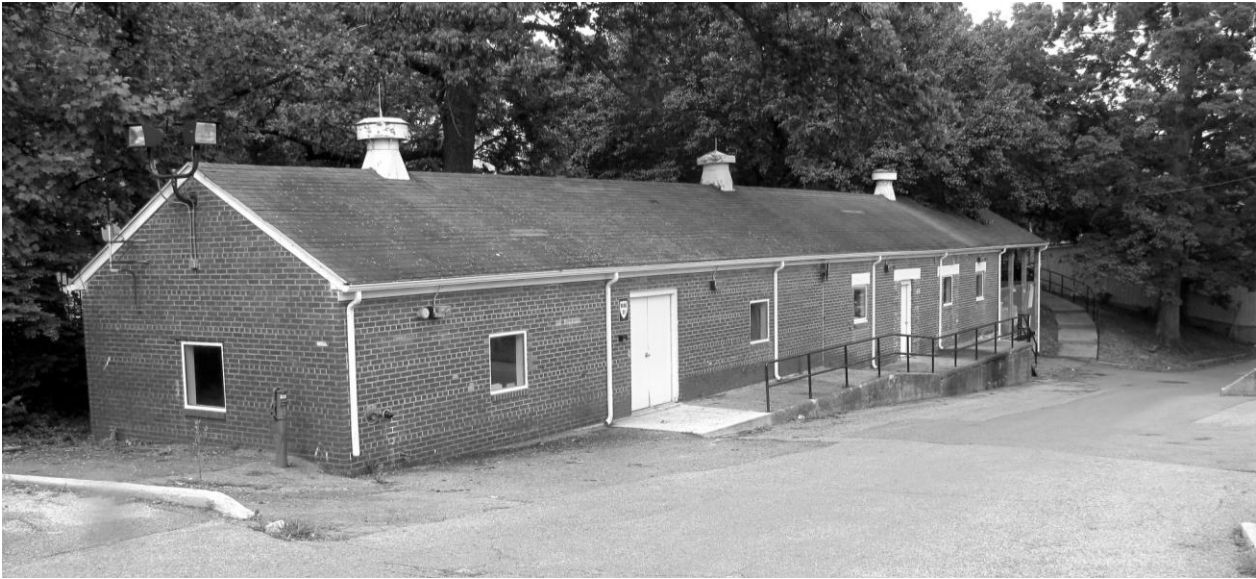
Walter Reed Army Medical Center, then consisting of little more than the core of today’s Building 1, was established in 1909. It was intended ultimately to combine on a single campus an Army general hospital, the Army Medical School, the Army Medical Museum, the Surgeon General’s Library, and pathology research facilities. The hospital function 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 lengthy public consultation on the topic of the closure and its preservation implications carefully considered the significance and integrity of the whole campus and of each building. One building dating within the period of significance was determined noncontributing for lack of sufficient historic integrity. In the designation of the historic district and its listing in the National Register of Historic Places, the Board and the Register adopted the list of contributing features.

Last year, developer TPWR Developer LLC (a joint venture of Hines-Urban Atlantic-Triden) made application to raze these buildings, concurrent with an application to demolish Building 38 and this same concept to widen Aspen Street. While the Board found the raze of Building 38 to be contrary to the purposes of the law, the application withdrew Buildings 31 and 84 from consideration. The raze of Building 38 was approved by the Mayor’s Agent for the benefits of adjacent road improvements.

The two buildings presently proposed for demolition are not the largest, most prominent or most significant of the contributing buildings, but each was determined by the Board to contribute in its own way to the character and story of the historic district when the district was designated, and they are part of a historic cluster of utility and support buildings for the hospital.

Building 31 stands just north of the campus’s southern boundary, facing north. This detached, ventilated, brick building was erected in 1921 for the storage of automotive and “medical” oils. It was extended, in 1941, within the campus’s period of significance.



Building 84 is a neighbor of Building 31 and is also related to transportation and to World War II-era expansion, as it was built as a wagon shed in 1942. It, the post service station, and other structures replaced the *circa* 1910 Building 6, which once housed both wagons and automobiles.



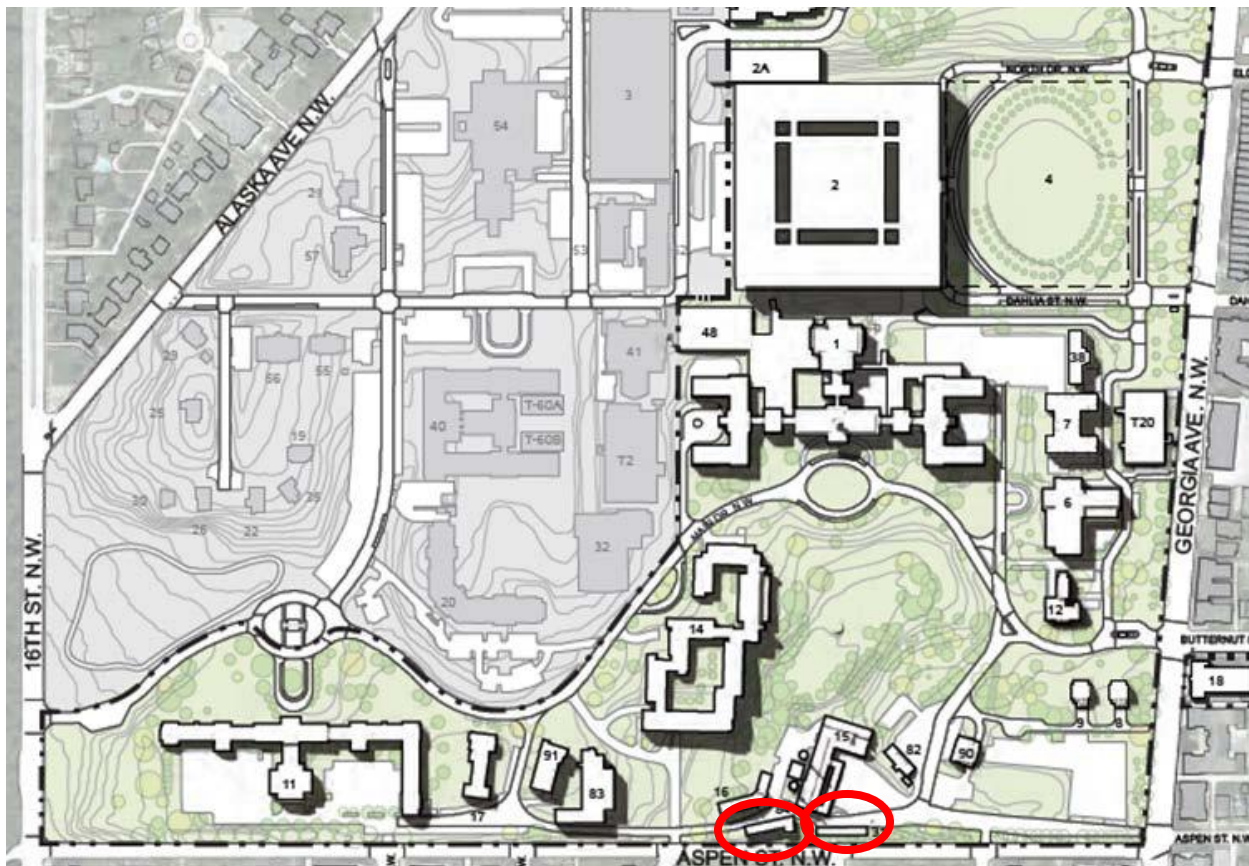
The demolition of Buildings 31, 38 and 84 was first proposed in the 2012 draft small-area plan for Walter Reed. The Board has no authority to approve or deny small-area plans or campus master plans, but it reviews them to anticipating future preservation issues. The September 2012 HPO report pointed out that:

Demolition of the buildings 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 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.

While the intent to raze the buildings has remained, the purpose of the demolition has changed. In the 2012 small-area plan, it was thought that an additional campus entrance from Aspen Street might necessitate their removal, but that entrance was shifted further east for unrelated reasons. More recently, the purpose has been the widening of Aspen Street.



Although alternative Department of Transportation (DDOT) plans for widening Aspen Street have shown the trail avoiding the buildings (see page 7), the applicant's argument is that it would be unsafe to construct it as DDOT has depicted it.

Evaluation of the razes

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 would harm the integrity of the historic district. Sanitizing the property of its utility buildings diminishes our understanding of the development and use of the site. Unless there were a compelling reason for the reassessment and categorization of these three buildings as “noncontributing,” the Board would have to recommend against demolition as inconsistent with the law's purposes.

Aspen Street widening

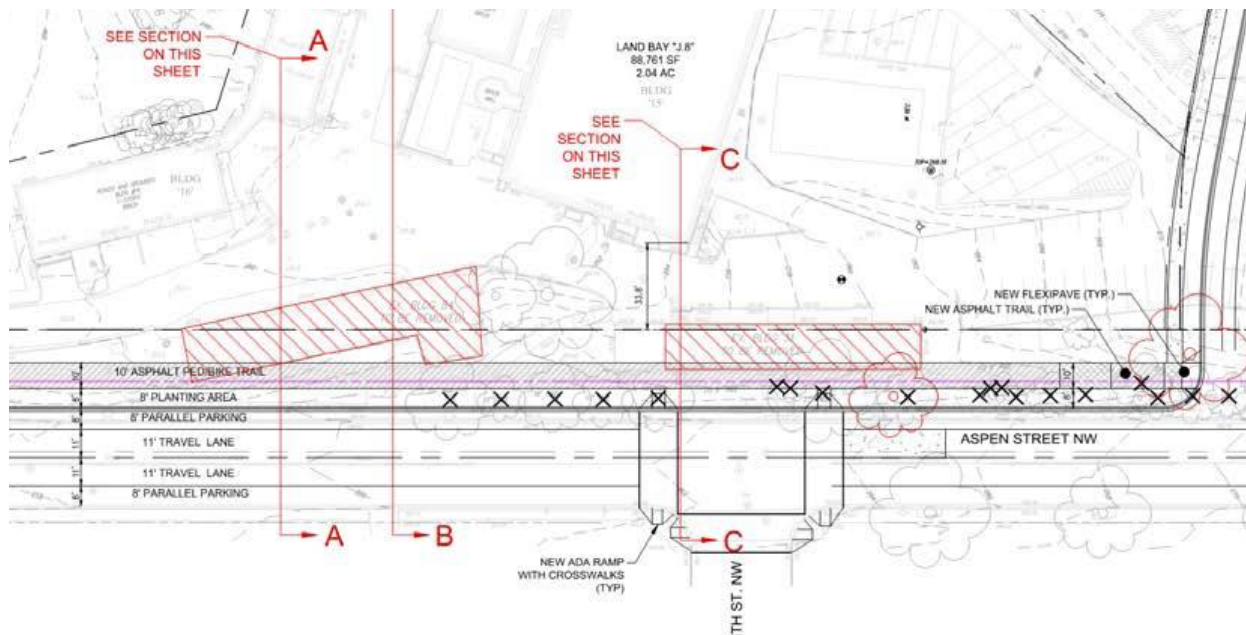
The applicant has presented a concept for alterations to the Aspen Street right-of-way, to provide a parking lane and a ten-foot-wide pedestrian and bike trail, generally separated by eight-foot planting buffer, DDOT's preference. It is the same concept submitted and withdrawn last year. The Board was very supportive of a trail schematic included in the 2015 master plan, but warned of the substantive and procedural issues related to demolition.

The widening of the right-of-way itself is not especially important. As proposed, it takes in large portions of the two buildings, but its north edge is an imaginary line, often several feet beyond any paving. As pointed out in last year's staff report, there may be no compelling reason why the interests of the road widening, the trail construction, and the preservation of the two buildings cannot all be served. As the presentation illustrates, there seem to be available alternatives that would provide both the parking and the trail without disturbing the historic structures. Indeed, the concept drawings depict similar shifts near the west end of the trail—to avoid trees and then to skirt a right-turn lane (see second image on the next page). The drawings also indicate that such modifications are possible elsewhere, for instance, south of the District of Columbia International School (Delano Hall, Building 11), where a note states that “the bike trail could be shifted and the proposed retaining wall could be eliminated...”

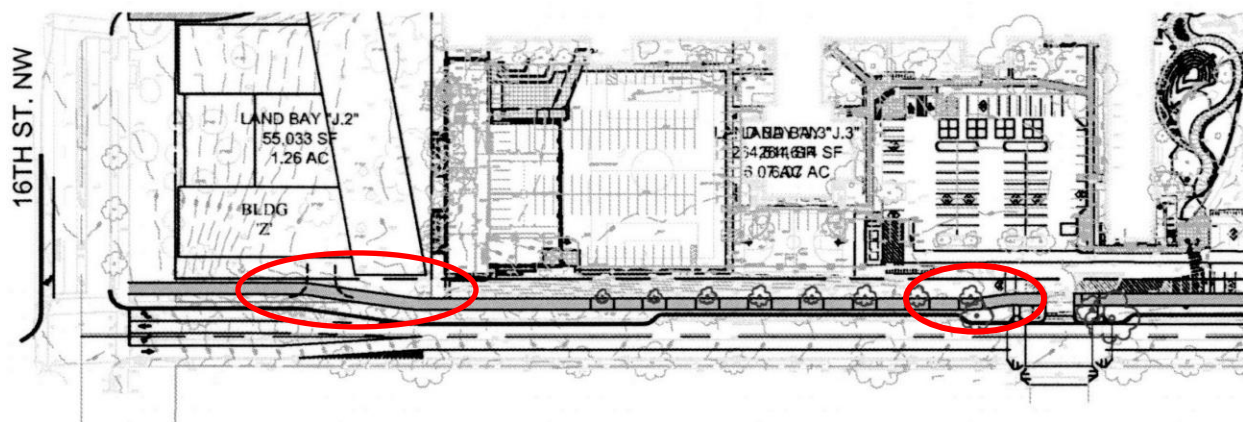
Such modifications appear to be feasible in part because the Department of Transportation (DDOT) has submitted to the Historic Preservation Office plans for the same project that depict the trail avoiding Buildings 31 and 84 (see next page).¹ Submitted as a District government undertaking in accordance with Section 9b of the Act, the project has thus far been found to cause or constitute no adverse affects. There is an advantage to keeping the trail nearer to Aspen Street and following its rise and fall. The topography rises or falls off away from the street, meaning more cutting, filling and retaining walls the farther one goes. The downside is putting the trail at the curb near the travel lanes on Aspen, and removing the parking lane for this stretch.

Otherwise, the trail concept seems compatible. But it is important that it be fully developed and detailed in three dimensions, so that the Board may evaluate all its effects. No historic resources

¹ DDOT's first drawings for widening Aspen Street date to July 2014 and showed the trail avoiding Buildings 31 and 84. The 13th Street entrance had already been shifted eastward, but an alternate depicted it still possibly going through Building 31. DDOT's April 29, 2019 plans show the same, minus the alternate 13th Street entrance. These plans also depict extensive retaining walls, which we would like to see developed in three dimensions, with materials and any railings or fences specified.



Details of the concept for the trail.



would be directly impacted beyond Buildings 31 and 84, but the changing topography across the campus necessitates a series of prominent retaining walls to support the trail from grades falling away into the campus or toward Aspen Street, and possibly the construction, removal and/or relocation of fences and railings. While we understand most of the present fencing to be removed, the school in Building 11 expressed an interest in keeping the fence along the south side of its property, for security reasons. It is important to see all the details before permitting, and the DDOT drawings are farther along in that regard.

Mayor's Agent?

When the Board reviews an alteration, the Board balances the strict preservation interest with the adaptability interest, pursuant to the express purposes of the law.² When a historic building is proposed to be destroyed, however, the Board cannot simultaneously recommend approval and uphold its charge to retain historic properties. Any balancing of total demolition with other interests falls to the Mayor's Agent.

² For instance, the Board could recommend, as consistent with the purposes of the law and its common practice, the demolition of eastern open-shed addition to 84 as necessary within the context of a project.

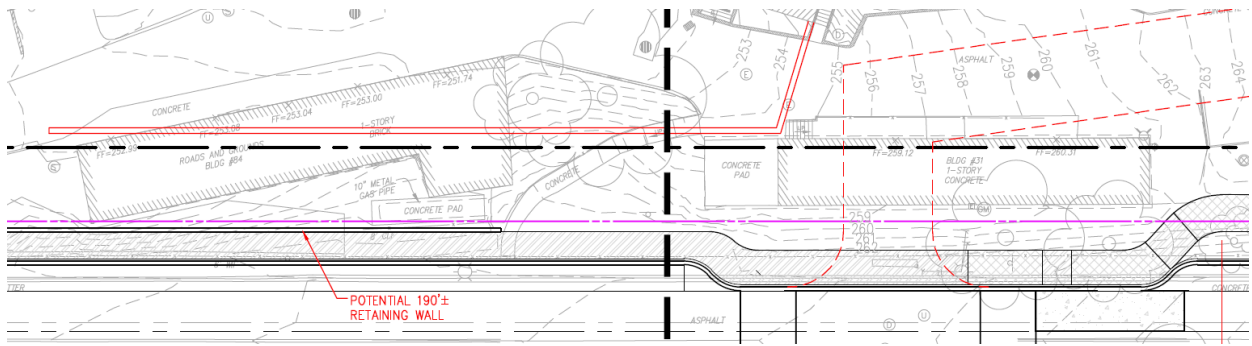
Following a recommendation against razing any historic buildings, an applicant may request a hearing of the Mayor's Agent to consider the question. There are three grounds upon which the Mayor's Agent may order an outcome different from that recommended by the Board. First, the Mayor's Agent may find 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 such proceedings, and the one that most often prevails.

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 retention and compatibility. Yet, the Mayor's Agent may rely upon the record of a Board hearing to inform his decision. The evidence presented here is useful for the inquiry into the question of whether a special-merit project is necessary, i.e., whether there are feasible alternatives that could avoid serious adverse effects. First, of course, there must be a 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)). Based on the evidence of DDOT plans, the trail project may be feasible without the demolition.

Recommendation

HPO recommends that the Board not recommend preservation clearance of permit applications to raze Buildings 31 and 84, because their demolition would not retain, enhance or adapt contributing structures, contrary to the purposes of the preservation law and incompatible with the character of the historic district. HPO further recommends that the Board support the concept for the road-widening and trail, with the proposal to be revised to avoid Buildings 31 and 84 and further developed to depict construction details such as retaining walls, fences, etc.



Above: A detail of the July 2014 DDOT plan. Below: Details of the April 2019 DDOT plan.

