



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

October 31, 2013

Chair and Members of the Board
D.C. Historic Preservation Review Board
1100 4th Street, SW, Suite E650
Washington, DC 20024

Re: McMillan Park Reservoir, North Capitol St./Michigan Ave. NW
Conceptual Design Review

To the Members of the D.C. Historic Preservation Review Board,

On behalf of the National Trust for Historic Preservation, I am writing to express our continued objections to the proposed conceptual design and master plan for the development of the McMillan Park Reservoir sand filtration site.

As you know, we presented a number of objections at the Historic Preservation Review Board meeting on June 27, 2013. Although the conceptual design and master plan have been modified somewhat, our objections remain.

The Proposed Development Does Not Comply with the Covenants That Conditioned the Sale of the Land from the Federal Government to the City.

The National Trust remains extremely troubled by the fact that the development plans completely disregard the binding historic preservation covenants that conditioned the sale of the McMillan Reservoir site from the GSA to the City in 1987. Those historic preservation covenants require two things:

- First, the D.C. Historic Preservation Officer must review all preliminary and final plans and specifications for renovation, rehabilitation, demolition, or new construction within the site, and if the HPO does not “agree with” the preliminary or final plans, and the disagreement cannot be resolved, the District must immediately request the comments of the Advisory Council on Historic Preservation in accordance with 36 CFR Part 800.
- Second, the covenants specifically require that any and all rehabilitation and renovation work at the site will be undertaken in accordance with the *Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. The proposed conceptual plans do not even attempt to conform to the *Secretary’s Standards*.

The whole purpose of the preservation covenants was to ensure that the transfer of the property from the federal government to the City would have “no adverse effect” on the historic McMillan Reservoir site. That requirement of “no adverse effect” simply cannot be reconciled with these proposed plans.

The Proposed Development is Incompatible with the Historic Character of the McMillan Park Reservoir Site.

In the National Trust's view, the height, scale, density, massing, and design of the proposed new construction remains inappropriate for the historic McMillan Park Reservoir site and is inconsistent with the overall character, landscape, and historic vistas of the site.

We specifically disagree with two of the final recommendations in the staff report:

- First, the conceptual design does ***not*** “retain important character-defining features of the site sufficient to convey its historic characteristics.” In particular, the vast majority of the below-grade cells would be destroyed, and virtually no effort is made to expand the retention of these significant historic spaces.
- Second, the conceptual design does ***not*** “specifically relate[] to the character of the McMillan site.” While it may be an “architecturally coordinated and cohesive approach,” that architectural approach bears no relationship to the historic features of the McMillan site.
 - Instead, the height, mass, and scale of the new development would overwhelm, obscure, dominate, and distract from those features.
 - In particular, the shape and bulk of the medical office buildings, whose upper floors extend out to dominate space rather than transition back, continue to recall the architecture of the urban renewal era, rather than bearing any relationship to historic character at the site.
 - The surface textures and fenestration of the new buildings are also completely incompatible with the historic features at the site. We strongly disagree with the notion that the “gridded and banded” façade treatments create the impression of “symbolically referring to the site’s historic water filtration function.” Instead, these overly busy, striated textures will only distract from the remaining historic structures.

In 1990, when the National Capital Planning Commission reviewed and approved the amendment to the Comprehensive Plan that allowed some development at the McMillan Reservoir site, the staff specifically evaluated the potential adverse visual impact of development on the significant character-defining aspects of the site. That analysis included specific recommendations for ensuring that the development would minimize or reduce adverse visual impacts. The analysis concluded:

“[W]e find that . . . any structures to be introduced with the District-owned part of McMillan Park should be *widely spaced*, [should] *not exceed the 4-story height* of the Veterans Hospital, and preferably have *lower transitional heights and picturesque rooflines* to blend with the immediate landscape and the park environs.” [Emphasis added]

In the National Trust's view, a development plan consistent with these recommendations

—widely spaced buildings, limited to four stories, with lower transitional heights and picturesque rooflines—could well be compatible with the historic character of the site, and could be an enormous asset to the City. But the current proposal does not even come close.

In closing, we urge the Review Board to reject the conceptual plans for the McMillan Park Reservoir site.

Interests of the National Trust.

The National Trust was chartered by Congress in 1949 as a private nonprofit organization to facilitate public participation in the preservation of our nation's heritage, and to further the historic preservation policy of the United States. *See* 16 U.S.C. § 468. With the strong support of our members around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The National Trust has also been designated by Congress as a member of the federal Advisory Council on Historic Preservation, 16 U.S.C. § 470i(a)(8), which oversees the implementation of Section 106 of the National Historic Preservation Act (NHPA), *id.* § 470f, 36 C.F.R. Part 800.

The National Trust has been concerned about the protection of the McMillan Park Reservoir site for decades. Back in 1990, we joined as a plaintiff in a lawsuit against the National Capital Planning Commission (NCPC) to enforce federal compliance with Section 106 of the NHPA, in connection with the federal transfer of this historic property to the District of Columbia and the NCPC's amendment to the D.C. Comprehensive Plan to allow development of the site.¹

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

cc: Advisory Council on Historic Preservation

Enclosure:

NCPC staff memo from Robert E. Gresham, Ass't Exec. Dir. for Operations, to Donald E. Jackson, Architect, Planning Serv's Div., re McMillan Park Visual Analysis (Feb. 12, 1990)

¹ *See McMillan Park Comm., et al. v. National Capital Planning Comm'n*, 759 F. Supp. 908 (D.D.C. 1991), *rev'd in part on other grounds*, 968 F.2d 1283 (D.C. Cir. 1992).

Capital Plan

NAT. JAL CAPITAL PLANNING COMMISSION
1325 G STREET N.W.
WASHINGTON, D.C. 20576

NCPC File No. CP19

February 12, 1990

M E M O R A N D U M

TO: Robert E. Gresham
Assistant Executive Director
for Operations

FROM: Donald E. Jackson *dej*
Architect, Planning Services Division

SUBJECT: McMillan Park Visual Analysis

In brief, McMillan Park occupies a strategic position in the Special Street character along North Capitol Street and in the reciprocal views between Capitol Hill and Soldiers' Home Hill. Historically, these axial relationships have been a fundamental design feature of Washington. The scenic integrity in this progression of townscapes and landscapes has long been recognized, as exemplified by the L'Enfant Plan, the founding of Soldiers' Home and (quite appropriately) the commemoration of Senator McMillan's respect for public works as a means of restoring and extending the image of the National Capital. The park open-space also contributes significantly to the overall scenic setting formed by the Soldiers' Home and its environs, visually linking the Shrine of the Immaculate Conception and Trinity College settings with those of LeDroit Park Historic District and the older campus of Howard University. The park's picturesque combination of reservoir, structures and grounds provides the only "ornamental-water" landscape of the District of Columbia, apart from the rivers and monumental reflecting pools; access to its full enjoyment was limited in World War II for security reasons.

McMillan Park appears in every version of a National Capital open-space system, from the 1901 McMillan Plan to the present Comprehensive Plan. The visual qualities summarized above were a major factor in this inclusion, compatible with the additional factors of public recreation and engineering use/preservation. Prior to NCPC's 1970 adoption of a Parks and Recreation Facilities element for the Comprehensive Plan, other re-uses of the McMillan site were considered, ranging from school centers to housing. At that time, careful visual analysis indicated that the redevelopment scale would conflict with the scenic values, as well as with water-works retention and recreation potentials.

Retention of the area's comparatively parklike openness and provisions for new landscaping were stressed in the NCPC and CFA approvals of the 1950's hospital and road developments between McMillan Park and Soldiers' Home. The height of the general hospital, which is sited somewhat to the side of the main view lines, was limited to 8 stories with a central penthouse. The approved height of the Veterans Hospital, which is sited mostly within the central views, was 4 stories

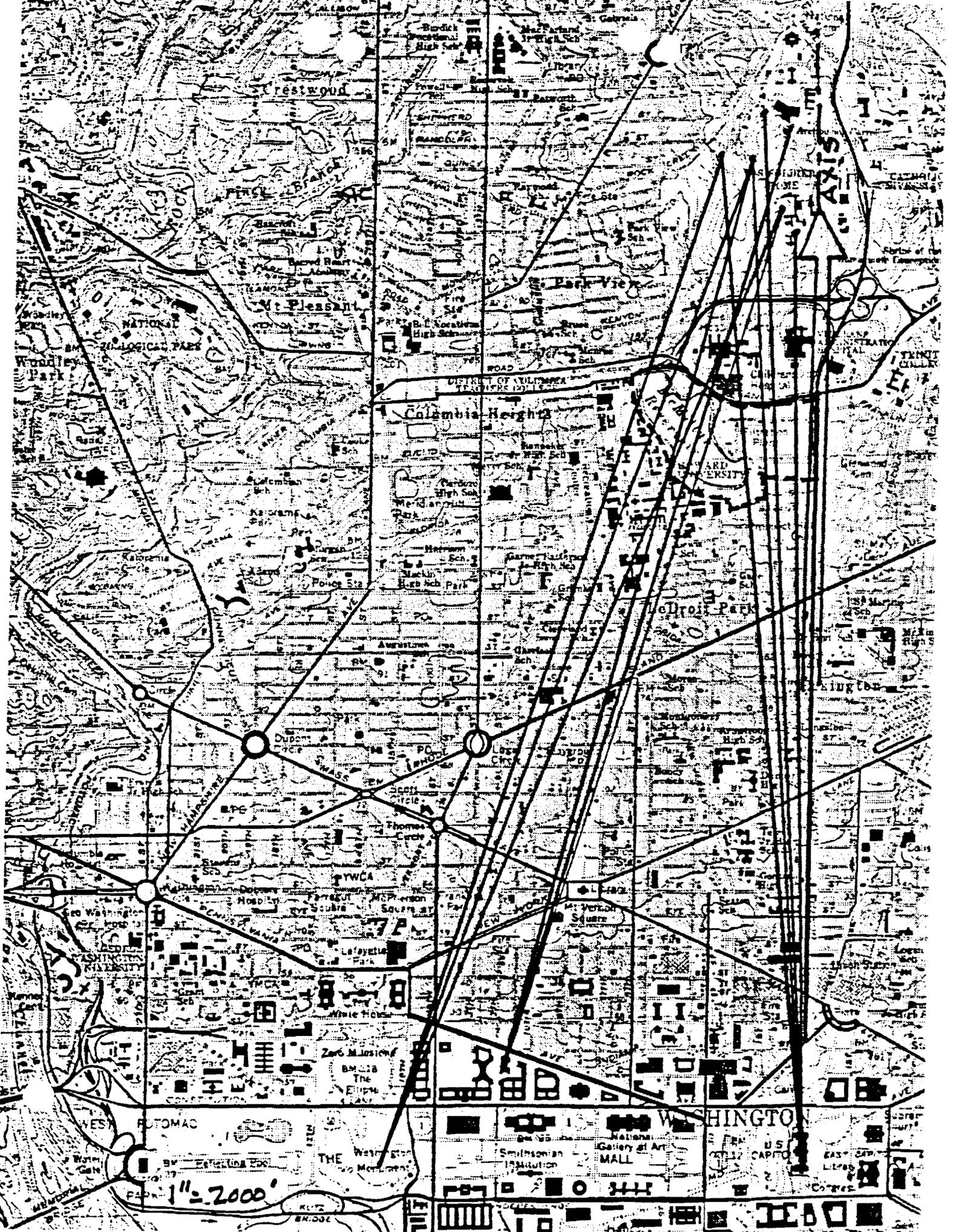
with a central penthouse for aesthetic reasons. NCPC also reviewed the new Children's Hospital in this context as well as in the comprehensive planning context noted above.

The following diagram schematically shows a number of sightlines between Soldiers' Home hill and the U.S. Capitol dome, the Old Post Office tower and the Washington Monument. Close visual relationships with the hospital complex, McMillan Reservoir, and the District-owned portion of McMillan Park can be readily interpolated. For graphic clarity, many more incidental sightlines and picturesque views are omitted here but should be considered, such as views and vistas along the curve of North Capitol Street, the east-westerly array related to the Shrine and Howard University, et cetera.

o. l. s. v. a. { From this analysis we find that (1) a distinctly open-space character of McMillan Park is still scenically desirable as a Federal interest, and (2) any structures to be introduced with the District-owned part of McMillan Park should be widely spaced, not exceed the 4-story height of the Veterans Hospital, and preferably have lower transitional heights and picturesque rooflines to blend with the immediate landscape and the park environs.

Attachment:

copies:
Hromanik
Bozarth
Oberlander
Dodd-Major
Wilson
Stephenson
Foushee
Central File - CP19
Reading File



Woodley Park

St. Restwood

Mt. Pleasant

Columbia Heights

Adams Morgan

NATIONAL ZOOLOGICAL PARK

WASHINGTON UNIVERSITY

WASHINGTON

1" = 2000'

Legend:

- (Solid black square) - Building
- (Hatched square) - Masonry building
- (Circle with dot) - Public building
- (Circle with cross) - Church
- (Circle with vertical lines) - School
- (Circle with horizontal lines) - Office building
- (Circle with diagonal lines) - Warehouse
- (Circle with wavy lines) - Park
- (Circle with concentric lines) - Monument
- (Circle with grid) - Station
- (Circle with star) - Embassy
- (Circle with dots) - Cemetery
- (Circle with triangle) - Theater
- (Circle with square) - Museum
- (Circle with diamond) - Hotel
- (Circle with circle) - Bank
- (Circle with square) - Post office
- (Circle with triangle) - Fire station
- (Circle with diamond) - Police station
- (Circle with circle) - Court
- (Circle with square) - Library
- (Circle with triangle) - Museum
- (Circle with diamond) - Hotel
- (Circle with circle) - Bank
- (Circle with square) - Post office
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