

U.S. COMMISSION OF FINE ARTS

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NATIONAL BUILDING MUSEUM
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26 October 2007

Dear Mr. McGill:

In its meeting of 18 October, the Commission of Fine Arts reviewed the draft master plan and security master plan submitted by the General Services Administration (GSA) for accommodating the Department of Homeland Security (DHS) headquarters on the West Campus of St. Elizabeths Hospital. The Commission concluded that the submission was insufficient to merit action.

The Commission reiterated many of its concerns expressed at the information presentation in June 2007. In particular, the Commission members continued to question the effort to place 6.5 million square feet of built area at this location and the irrevocable change that this will impose on the site's character. They were critical of the draft master plan which presented two virtually identical alternatives instead of a more comprehensive range of options and approaches for the treatment of the campus, the amount of program to be accommodated, and its disposition into varying types of building masses and configurations on the site.

The Commission emphasized that the most important quality of the site is its topographical prominence on the escarpment framing the design of the national capital; this should be the primary consideration in the master plan which should improve, rather than detract from, this resource. While the Commission members expressed support for the effort to preserve the site's historic buildings, landscapes, and wildlife habitat, they questioned whether these design constraints are consistent with the overwhelming scale of new construction that is proposed. If historic preservation alone were the overriding consideration for redevelopment of the site, they said the proposed master plan is unsuccessful and would permanently damage the character of the historic campus. The Commission recommended more flexibility in generating alternatives for the treatment of the campus, commenting that rigid adherence to a fixed program and the retention of existing buildings has compromised the planning process and resulted in an insufficient and unsatisfactory pair of alternatives.

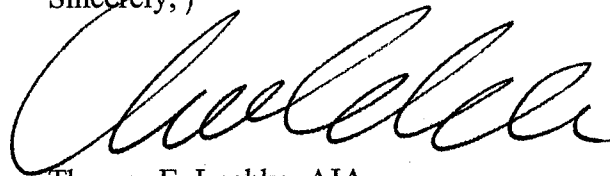
The Commission heard testimony from representatives of the National Trust for Historic Preservation, the District of Columbia Office of Planning, the Brookings Institution, the Committee of 100 on the Federal City, and others who expressed opposition to the plan as proposed. Overall, the testimony showed a clear consensus of professional opinion that the program is excessive for the site. In addition to the harm to this National Historic Landmark, their specific concerns

included the isolation of this project from the adjacent neighborhoods; the resulting lack of local economic benefits as well as public enjoyment of the site's amenities; and the impacts of transportation and parking to accommodate the large number of proposed employees. Their suggestions to improve the plan included relocating some of the program to other sites such as the east campus of St. Elizabeths, locating some of the parking off-site, and considering other uses for the property that would more appropriately take advantage of the site's considerable assets.

After two years of consultation with the review agencies and the public, it is regrettable that the master plan does not incorporate their advice to reduce the program, nor does the plan present any meaningful alternatives to explore their concerns. Therefore, the Commission asked that GSA engage in a fruitful dialogue with concerned members of the public as well as with the review agencies to respond more positively to their advice. Useful guidance may also be found in GSA's own studies of 2002 and 2005, both of which recommend a much smaller program for the site in the range of 1.8 to 3.0 million gross square feet of built area.

The Commission looks forward to a revised submission that provides a thorough analysis of the issues involved in the adaptive reuse of this site and a wider range of true alternatives for consideration. The Commission's review of this project addresses design issues raised by GSA's proposal for the St. Elizabeths West Campus and is not intended to evaluate the programmatic and operational needs of DHS. As always, the staff is available to assist you.

Sincerely,



Thomas E. Luebke, AIA
Secretary

Michael McGill
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cc: ✓ Martin Denholm, SmithGroup
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