

**Testimony of
The D.C. PRESERVATION LEAGUE**

**before the
U. S. Commission of Fine Arts**

October 18, 2007

**On the
St. Elizabeths Hospital, West Campus
Preliminary Master Plan and Security Master Plan for the Department of Homeland
Security Headquarters**

Chairman Powell and members of the Commission:

My name is John Clark. I am a Trustee of the DC Preservation League, and I want to thank you for this opportunity to testify on behalf of our organization today about the fate of a National Historic Landmark, the West Campus of Saint Elizabeths Hospital, one of this region's and the country's most significant and precious historic sites.

The D.C. Preservation League has long been concerned about the sad deterioration of St. Elizabeths, with its 61 buildings, unique and beautiful forested ridge-top landscape, and spectacularly overlooking the capital city, yet left dormant and empty for some thirty years. The League included Saint Elizabeths in four of its past eight annual listings of DC's Most Endangered Places. We have repeatedly urging the government to rehabilitate and open to appropriate productive use this truly remarkable and priceless historic national treasure.

Others agree with our assessment of this site. The government's own land use study for the Department of Homeland Security Master Plan described St. Elizabeths this way:

The St. Elizabeths' campus occupies a bluff overlooking the Anacostia River, with sweeping views of the Monumental Core of Washington, D.C. The St. Elizabeths Hospital district is an exceptionally rich collection of buildings, landscapes and green spaces, with views and vistas that are extraordinary in their design or natural character. Nationally recognized architects and landscape architects are responsible for its planning, design and construction.

Thankfully, two years ago the Government Service Administration ("GSA") began a stabilization project for St. Elizabeths, and GSA has repeatedly shown its preservation skill and great sensitivity for the importance of preserving the historic character of this Historic Landmark. The League applauds the work that has been done so far, and strongly supports the rehabilitation and appropriate re-use of St. Elizabeths.

Unfortunately, GSA's preservation sensitivity has been rendered largely irrelevant by the grossly insensitive plans and huge minimum space demands of its client, the Department of Homeland Security ("DHS"). For the DHS headquarters project before you today, GSA has been forced to cram into the limited buildable spaces at St. Elizabeths' an overwhelming density

of new development that would irretrievably alter and in effect demolish the historic integrity and character of this site.

Over the past few months, a working group of public and private parties, including representatives of the League and the Commission, have carefully examined the west campus, parcel by parcel, and developed a recommendation for the maximum reasonable density for St. Elizabeths. Their unanimous conclusion was that the site could reasonably sustain a maximum of nearly 3 million gross square feet of above-and underground new development and re-use space. Significantly, this upper limit is consistent with the preferred alternative of the 2005 GSA Land Use Feasibility Study and the 2003 expert panel report from the Urban Land Institute.

With these consulting parties, the League strongly believes that development of much greater density, such as the plans for more than 6 million sq. ft. offered to the Commission, would fundamentally destroy the National Historic Landmark, possibly threatening its delisting due to loss of historic integrity.

As a site of exceptional national significance and because of its designation as a National Historic Landmark, Section 110(f) of the National Historic Preservation Act, requires that GSA “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm” to St. Elizabeths. (Section 110(f) of the NHPA, id § 470h-2(f).) Implementation of either of the two massive alternatives proposed by GSA would clearly not comply with this federal law, or provide St. Elizabeths with the historic protection that it deserves.

Given the general expert consensus on a practical limit of 3-million sq. ft. of usable space for this site, it would seem reasonable for DHS to limit its project to this size – to accommodate only its true core headquarters functions - particularly since its reported overall requirements of 8-million sq. ft. cannot be fully accommodated at St. Elizabeths under any scenario.

Many have questioned whether turning St. Elizabeths into a super-high-security, double-fenced compound, with the exclusionary security and perimeter safety policies that the DHS headquarters would require, is the best use of this site. It is clear that any plan would limit both preservation and appreciation of its unique historic qualities, and its social and economic connection to the local community and neighborhoods.

Therefore, the occupation of St. Elizabeths by DHS, at whatever density of development, will impose a drastic alteration of uses of the Historic Landmark, and inevitably and permanently shut off public access to most of those uses and buildings. That is not to say, however, that the public must necessarily lose access to the most valuable of the historic features of St. Elizabeths, its historic vistas and views.

For this national treasure of exceptional significance, the jewel in the crown is surely “The Point.” It has been said that the views from The Point are “majestic and among the finest in the area, if not the nation.” The Point offers panoramic and unparalleled views of the entire D.C.-area basin, from Alexandria across to D.C.’s monumental core, to the Capitol and into Maryland. These vistas are a unique asset to the surrounding community, the District and the nation.

Public access to this remarkable amenity is one way to preserve for the public a unique and uniquely valuable element of historic St. Elizabeths. While the interior campus must be enclosed in the perimeter of any DHS development plan of whatever density, The Point can be

carved out of such security perimeter to allow relatively permanent and controlled access to the public. With care, this can be accomplished within DHS's reasonable security requirements.

The League urges this Commission to agree with the unanimous conclusion of the consulting party working group, that any reasonable plan of government development for St. Elizabeths must be limited to 3 million gross square feet, and further, to include public access to The Point, as part of its comments and recommendations on the St. Elizabeths Master Plan.

Thank you for considering the views of the D. C. Preservation League on this very important matter.