

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

**before the**  
**National Capitol Planning Commission**

**November 1, 2007**

**On the**  
**Saint Elizabeths Hospital, West Campus**  
**Master Plan for the Department of Homeland Security Headquarters**

Good afternoon Mr. Chairman and Commission members. My name is John Clark and I am a Trustee of the DC Preservation League. We speak to you today about the endangered fate of one this city's, and indeed this country's, most significant and precious historic sites: the West Campus of Saint Elizabeths Hospital.

The D.C. Preservation League has long urged the revitalization of St. Es, a remarkable and priceless national historic treasure, sadly left dormant and unused for decades. Four times the League has highlighted her in its annual listing of D.C.'s "Most Endangered Places."

Many have looked to the federal government as the best hope to bring historic St. Es back to life and productivity – and many still hold that hope. Instead, however, with the plan before you, the government now threatens not to restore but to ruin the historic character and landscapes of St. Elizabeths, by loading the site with an unbearable mass of new buildings and parking structures, and sealing it off behind double-walls of maximum security.

It is puzzling that these dramatic threats are widely acknowledged, yet so far unresolved. The GSA's own evaluation admits that their plans would cause major, long term adverse impacts to the significant historical, architectural, landscape and spatial character of the site. The Commission of Fine Arts last week told GSA that the proposed "overwhelming scale of new construction . . . would permanently damage the character of the historic campus." And the consulting parties for this project have unanimously concluded that the plans for 6.4 million sq. ft. of development would "fundamentally destroy the National Historic Landmark ("NHL").

Causing significant damage to an NHL is inconsistent with the federal laws designed to protect our nation's most important historic assets. Indeed 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).) Adverse effects from new roads through the adjacent historic Shepherds Parkway are covered by another law that requires GSA to minimize harm, and make a showing of no "prudent and feasible alternative." (49 U.S.C. §1653(f).) We believe that GSA has so far not undertaken the "planning and action" necessary to comply with these federal laws, or yet provided St. Elizabeths with the historic protection that it deserves.

Many have questioned whether turning St. Elizabeths into a super-high-security double-fenced compound is the wisest and best use of this site. It is clear that any such use will severely

limit both the preservation of its unique historic qualities, and its social and economic connection to the local community.

DHS's occupation of St. Elizabeths, at whatever density, will inevitably and permanently shut off public access to, and appreciation of, most all of the site's landscapes, buildings and uses. The public should not, however, lose access to the most valuable of its historic features: its incomparable vistas. While the entire campus is a national historic treasure of exceptional significance, the jewel in the crown is surely "the Point" with majestic, panoramic and unparalleled views that are "among the finest in the area, if not the nation." These vistas are a unique asset that can and must be preserved for us all.

Public access to the Point is one way to preserve a unique and uniquely valuable element of historic St. Elizabeths, as your staff report acknowledges with the requirement that GSA outline a plan of opportunities, means and times for public access to the Point. The League suggests, however, that access limited to a few hours, or a few times a year, would be neither reasonable nor sufficient for the community or the country.

Under any DHS plan, the interior campus must be enclosed within a security perimeter. The Point, however, could be carved out of that perimeter to allow relatively permanent and controlled public access, shared by DHS within the proposed formal entrance to St. Es. We are confident that with care, this can be accomplished within all reasonable security requirements.

The League urges this Commission to require GSA to abide by the terms of its historic preservation mandates: to plan and act to minimize harm to this irreplaceable historic treasure; to limit above-ground development to a maximum of 2.5 million gross square feet; and to allow general and controlled public access to the Point.

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