

**National Capital Planning Commission
January 8, 2009**

**Testimony of Richard Moe,
President
National Trust for Historic Preservation**

**Regarding the General Service Administration's Master Plan
For the Department of Homeland Security Headquarters Consolidation
At St. Elizabeths Hospital**

Good afternoon. I am Richard Moe, president of the National Trust for Historic Preservation. I appreciate this opportunity to speak to you.

The decision you are being asked to make today – approving the proposed master plan for the consolidated headquarters of the Department of Homeland Security at St. Elizabeths – is one of the most monumental that you have ever faced. This would be the largest federal development in a generation, and as proposed it would irreparably damage, if not destroy, a National Historic Landmark.

National Historic Landmarks are places whose importance transcends local or state significance; they have exceptional value to the nation as a whole. The National Park Service, which manages the National Historic Landmark program, has carefully reviewed the proposal for DHS consolidation, and has concluded that the proposed master plan is “wholly incompatible” with St. Elizabeths – not just because of the proposed damage to the site itself, but

also because DHS security will cordon off this magnificent place forever from the enjoyment of all Americans. For the past three years, preservation organizations, including the National Trust, have decried the destruction of the landmark and the lack of public benefit, should this proposal move forward.

In November 2007, you heard our concerns, and you directed GSA to come forward with a plan that would show a maximum of 2.5 million gross square feet of above-ground development. Unfortunately, a viable lower-density alternative has not been developed, due to the rigid requirements of DHS.

GSA has done a commendable job applying some of our recommendations to its DHS consolidation plan. But the proposed development for the West Campus alone remains at more than 5 million gross square feet – **five times** the existing density on the campus. The footprint of the proposed Coast Guard building would be completely out of scale with the historic site, and the cemetery will be cut off from the landmark for the first time in history. We remain concerned about harm to historic buildings and landscapes due to security changes and underground construction. The proposed parking garage in the ravine would be massive, out of scale, and highly visible from outside the site. And while we certainly support moving density onto the East Campus, the East Campus is also part of the National Historic Landmark, and the impact on this portion of the NHL has not been evaluated.

We are also concerned about the acquisition of Shepherd Parkway, which will be essential for the project, but devastating for the national park. We certainly commend and support the National Park Service for its reluctance to sacrifice Shepherd Parkway to facilitate a destructive proposal for St. Elizabeths.

While this plan is an improvement - and we commend GSA, NCPD and the DC government for the enormous effort that led to those improvements - we should have done better. As a *nation* we should have done better.

The National Trust is profoundly disappointed by this plan in part because it *could* be done so differently. We have endorsed a 2002 Urban Land Institute study, which concluded that a mixed-use, public-private development - possibly involving a federal agency as the anchor tenant - made the most sense for the St. Elizabeths. Such an approach would bring much-needed revitalization to the campus and surrounding community, preserve and reuse important historic buildings, create rehab-based jobs, and draw new residents and business activity to a neighborhood that needs them badly.

DHS deserves a new headquarters. But this master plan is premature, and the security and density constraints imposed by DHS make this the wrong project at the wrong place. The nation will transition soon to a new Administration,

which may have different priorities for the agency. We have asked the Obama Administration to explore options for new investment and sensitive redevelopment at St. Elizabeths. At a minimum, today, this Commission should insist that outstanding issues – including planning for the East Campus and Shepherd Parkway – be resolved prior to approval, so that a complete master plan can be submitted and reviewed. And if the plan moves forward, funding to rehabilitate the site’s historic buildings and landscapes must be secured – not postponed until some later date.

The National Trust has worked hard to influence the details of this plan, because we care about the better ending, the better vision. We are proud of our role, and we intend to continue to participate as the review process goes forward.

But we are counting on NCPC to be vigilant as well, and to exert all of your power and influence to minimize harm to this National Historic Landmark. If you approve this plan today, you will still be in a position to ensure that the conditions you are placing are enforced, and you should look for every opportunity in the future to reduce the size of this project, to move more square footage off-site, and to minimize harm.

Thank you.