

Testimony of Anne Sellin, Preservation Expert Witness
Zoning Commission Case 13-14 McMillan PUD
May 8, 2014

This portion of my testimony addresses VMP developers' building schemes for for the McMillan PUD and the historic laws that govern this site which is both a local landmark and is on the National Register of Historic Places.

Comprehensive Policy MC 2.6.5: Scale and Mix of New Uses recommends that “Where development takes place, it should consist of moderate to medium density housing, retail, and other compatible uses. Any development on the site should maintain viewsheds and vistas and be situated in a way that minimizes impacts on historic resources and adjacent development.” As NCPC made clear in 1990 when it approved the amendment to the Comprehensive Plan that allowed some development at the McMillan Reservoir site: “[W]e find that...any structure 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.”

Only the equivalent of C 2 A or lower, which permit medium density development would be consistent with the Comprehensive Plan. The C3C zoning should be denied. Actually buildings up to 130 high are proposed for the northern most part of the site, buildings with a step down. This is forty feet more than C3C. It used to be in PUDs that the new zone proposed contained the parameters of the project proposed, but in this case, there seem to be no parameters. Back yards, loading docks, as well as a building height exceeding 40 feet of the two proposed zones indicate the sky's the limit. All this contradicts **Policy MC 2.6.55 of the Comprehensive Plan for McMillan which requires “moderate to medium density housing, retail and other compatible uses.”** Moderate and medium density would be R4 and R5 B with a height of 40 or 50 feet. Doctors' offices are permitted as special exceptions in these zones. CR is proposed for the apartment and row houses, but CR is a 90 ft. zone. Both C3C and CR are zones meant to be close to downtown, not interjected into the middle of residential neighborhoods, or to replace parkland.

These high buildings are in defiance of Comprehensive Plan, **Policy MC-2.6.1 which “Requires that reuse plans for the McMillan Reservoir Sand Filtration site dedicate a substantial contiguous portion of the site for recreation and and open space...consistent with the 1901 McMillan Plan connectivity to nearby open space such as the Armed forces Retirement Home, should be achieved through site design.”**

The proposed overpowering medical buildings would eliminate the flow to both the western part of McMillan as well as the view to the west to the colonial tower of Howard University and to the Romanesque tower of the West Gate House of the Federal west side of McMillan, and site-lines to its large body of water. The view of the sand towers from Michigan Ave. would be obliterated.

In fact any high buildings buildings defy the Standards for Rehabilitation of the Department of the Interior, an important covenant attached to the transfer of McMillan from Federal to the City ownership. Number 9 under these Standards state **“New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.”** All the buildings are squeezed around the north court, giving that court over to traffic. The planning of these buildings ignores the Mitigating Reuse Impact Policy MC 2.6.3 in the Comprehensive Plan for McMillan, **“Any change in use of the site should increase connectivity between Northwest and Northeast neighborhoods as well as the hospital complex to the north.”** This plan is self contained and has no connection to its neighbors. The above quoted Interior Standards number 9 **“construction will not destroy destroy historic materials, features and spatial relationships that characterize the property.”** The destruction of of the groin vaults which are in stable condition are exactly where these buildings would stand, those flanking the north court, the very ones in the best condition, **“cells” 10, 11, 12, 13, 14, 15, 16, 17, and 18.** These cells which were evaluated by structural engineer Robert Sillman to be stable or needing repair only to side side entrance cracks. Again, the Department of Interior guidelines read **“Will not destroy historic materials, features...”** In this *all the vaults would be destroyed*, except for one, preserved by the Water Department as a catch basin for run off water.. There is absolutely no exploitation of the striking and unique groin vaults that rise over 14 feet and could accommodate civic uses.

Across 1st St. the Corps of Engineers are still using their groin vaults which store cleansed water. Some decade ago the Corps covered them with a protective membrane to insure their continued good condition.

In contrast, the materials of the historic regulator houses certainly meet a high standard: they are unusually fine with their Flemish bond brickwork and lovely tile roofs. The doors to the vaults are bold and decorative with their diagonal boards and huge hinges, but all these are slated for destruction, leaving blank archways which now lead to the most important feature of the site, the one acre groin vaulted compartments of sand filtration, the heart of the historic site.

McMillan Policy MC 2.6.3 of the Comprehensive Plan requires any plan for the site to **“reduce parking, traffic, and noise impacts on the community: and improve transportation options to the site and surrounding neighborhood.”** Over 2,000 parking ^{spaces} are planned with no city provision to improve transportation to the site, an area already overburdened with heavy traffic and tie ups where quick entry to the hospital complex is absolutely crucial.

The Zoning Commission has an obligation to acknowledge the importance of the McMillan

Plan whose key feature in the area is McMillan Park. It also must see that a project of special merit results from a PUD, particularly a PUD that is unique in that requires over 50 million public dollars in public funding, much of that money going to the very destruction of defining historic structures of a park site. This is an area of the city, once rich in public spaces. But these have either been destroyed, such as Howard Park, or the public has been shut off from permission to even enter these open lands for their enjoyment. Over two thirds of the McMillan Park open space would be destroyed by this project along with the great majority of historic features of the site. The city has in recent years made efforts to reclaim historic L'Enfant streets that had been built over. This is a unique opportunity for you to acknowledge the function of the McMillan Park System. You should insist on a redesign of the site, mandating that it be treated sensitively and creatively and that the laws and covenant be complied with: its unique features and its spaces need to be restored, not intensively built over.

A project of special merit is the purpose of a PUD, not the greatest return to developers.