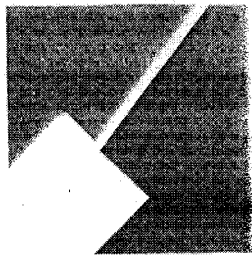


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MONTGOMERY COUNTY DEPARTMENT OF PARK & PLANNING

THE MARYLAND-NATIONAL CAPITAL  
PARK AND PLANNING COMMISSION

8787 Georgia Avenue  
Silver Spring, Maryland 20910-3760

July 1, 2005

**MEMORANDUM**

**TO:** Montgomery County Planning Board

**VIA:** Jeff Zyontz, Chief  
Countywide Planning Division

John Carter, Chief *JC*  
Community-Based Planning Division

**FROM:** Gwen Wright, Historic Preservation Supervisor *GW*  
Countywide Planning Division

Sue Edwards, I-270 Team Leader  
Community-Based Planning Division

**SUBJECT:** Worksession on Public Hearing (Preliminary) Draft Amendment to the Approved and Adopted *Master Plan for Historic Preservation*: COMSAT Laboratories, 22300 Comsat Drive, Clarksburg

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**STAFF RECOMMENDATION**

Designate the COMSAT Laboratories at 22300 Comsat Drive in Clarksburg on the *Master Plan for Historic Preservation*, with an environmental setting of 33.47 acres.

**BACKGROUND**

On November 1, 2004, the Historic Preservation Commission (HPC) received a nomination for historic designation of the COMSAT Laboratories Building from Professors Isabelle Gournay and Mary Corbin Sies of the University of Maryland. The HPC reviewed this nomination at meetings on February 9, March 9, and April 13. Based on this review, they have recommended that the COMSAT Laboratories Building be designated on the *Master Plan* as it meets criteria 1a, 1d, 2a, 2b, 2c, and 2e. The rationale for this recommendation and for the recommended 33.47 acre environmental setting is laid out in the Public Hearing (Preliminary) Draft Amendment.

On May 26, 2005, the Planning Board held a public hearing on the Preliminary Draft Amendment and took testimony from the nominators, the HPC, the owners, and interested

citizens. At the conclusion of the public hearing, the Board held the record open for one week and asked staff to schedule a worksession on this topic.

## **STAFF DISCUSSION**

At the conclusion of the May 26<sup>th</sup> public hearing, the Planning Board requested a number of pieces of information that were to be presented at the worksession. The following major questions were asked:

- Why was there no reference to this building in the Master Plan?
- How many resources less than 50 years old have been designated as historic in the county?
- What are other examples of Cesar Pelli buildings in the area?
- What exactly does the environmental setting mean and what can happen within an environmental setting?
- How was the recommended environmental setting determined (including questions about the viewshed to the building, its width, and whether it can be narrower)?
- What is the potential for removing non-contributing sections of the building?
- What is the Master Plan vision for development of this site (including environmental limitations on the site and open space requirements)?
- What is the developability of the site, if the building is retained?
- What is the adaptive reuse potential for the building?
- Is there a relationship between this building and the INTELSAT building in Washington?
- Provide hard copies of all powerpoint presentations.

Staff will address each of these topics in this memo.

### ***Why was the COMSAT Building not designated in the early 1990s during the Clarksburg Master Plan process?***

At the time of the Master Plan adoption in 1994, the building was only 25 years old. There was no imminent threat that could be discerned or that had been mentioned during the Master Plan process. COMSAT appeared to be a viable business that had a strong economic base in Clarksburg. Although this was a unique building, historic preservation staff believed that it would be most appropriate to hold off on any discussion of historic designation evaluation until the next update of the Clarksburg Master Plan. The impression staff had at the time of the Master Plan was one of certainty that COMSAT would be around for the foreseeable future.

In addition, in the early 1990s, historic preservation staff did not fully appreciate the significance of the COMSAT building. Staff knew that the building was designed by Cesar Pelli and that it had received much recognition in a variety of books and publications. However, Professors Gournay and Sies had not yet done their study of the Modern Movement in Maryland, so staff did not have information on the full architectural context and did not have documentation that COMSAT was one of the most important modern buildings in the state. Also, staff had not yet pursued research on the scientific work done by COMSAT Laboratories and it was only through Professors Gournay and Sies' nomination form that staff has realized the seminal role of the scientific commercial satellite work done in this building.

### ***Designation of Buildings Less Than 50 Years Old***

There is no reference in either the Historic Preservation Ordinance (Chapter 24A) or the Executive Regulations used by the HPC to 50 years as a threshold for historic designation. There has never been a stated or unstated policy in Montgomery County that buildings less than 50 years old – especially those of exceptional significance – cannot be evaluated for historic designation. Indeed Montgomery County has designated quite a few buildings before they were 50 years old – both publicly and privately owned, both commercial and residential. Some examples include: the Robert Llewellyn Wright House, the Rachel Carson House, the Tastee Diner, the Falkland Cupola Building, the Druid Theatre, the Bethesda Farm Women’s Market, the Bethesda Naval Hospital, and the Bethesda Theatre.

The threshold of 50 years is used by the National Register of Historic Places, but regulations guiding those listings include a major caveat that buildings of “Exceptional Significance” that are less than 50 years old can also be designated on the National Register. Staff believes that the COMSAT Laboratories building, though less than 50 years old, would qualify for National Register “Exceptional Significance” status – if a National Register nomination was submitted. It does so by qualifying in three ways: 1) exemplifying the advent of the civilian global communications age, making it exceptionally significant under the themes of commerce, engineering, science and politics/government; 2) being one of the country’s earliest and still best examples of “High Tech” architecture; and 3) being an important, early work of Cesar Pelli, a living master architect.

As for the owner’s concern that designating a building less than 50 years old would potentially mean the designation of significant numbers of ‘young’ office buildings in the county, it should be noted that the Modern Movement in Maryland study by Professors Gournay and Sies, which covered the years 1930-1972, does not recommend nominating any other major, private commercial office space in Montgomery County to historic registers of any kind. In other words, Montgomery County does not have other private office buildings from this period that are of this caliber and this class of architecture.

### ***Other Pelli Buildings in the Area***

Staff continues to firmly contend that the COMSAT building should be attributed to Cesar Pelli and this contention is affirmed by numerous professional publications, by knowledgeable architectural historians, and by Mr. Pelli, himself in several letters and communications to the Historic Preservation Commission and the Planning Board.

There are a total of four Pelli buildings in the area: two in Montgomery County (COMSAT and a private Bethesda home) and one in Washington, D.C. (a renovation to an existing office building on K Street) and one in northern Virginia (the new Ronald Reagan National Airport). Of these, only Reagan National Airport is of the same architectural significance as COMSAT. Photos of all four buildings will be presented at the worksession.

Regarding the importance of Mr. Pelli’s work and his role as an architect, he is one of only four, world-class architects with works in the entire state of Maryland. Besides Mr. Pelli, there is one building by Richard Neutra at St. John’s in Annapolis; two buildings by Mies van der Rohe in Baltimore; and two houses by Frank Lloyd Wright, the one in Bethesda and the other near

Baltimore. Those four architects, and their limited buildings, are all the state of Maryland has with regard to world-class Modern architecture.

### *Environmental Setting*

Before detailing the environmental setting analysis that has been done, staff would like to briefly discuss the definition of environmental setting and its purpose.

Chapter 24A, the Historic Preservation Ordinance, provides the following definition:

Appurtenances and environmental setting: The entire parcel, as of the date on which the historic resource is designated on the master plan, and structures thereon, on which is located an historic resource, unless reduced by the District Council or the commission, and to which it relates physically and/or visually. Appurtenances and environmental settings shall include, but not be limited to, walkways and driveways (whether paved or not), vegetation (including trees, gardens, lawns), rocks, pasture, cropland and waterways.

Nothing in this definition precludes changes within an environmental setting. The environmental setting definition allows for new buildings and other alterations to be introduced into an environmental setting. The HPC regularly approves changes and new buildings within an environmental setting, as long as they are compatible with the historic resource. Some examples of larger buildings reviewed and approved by HPC within an environmental setting include the Music Hall at Strathmore, the residential tower above and behind the Bethesda Theatre, and the Round House Theater next to the AFI Silver Theatre.

Staff would like to reaffirm once more for the Board that historic designation does not that designated buildings and their environmental settings are not frozen in time. **That is, designation of an environmental setting does not mean that the owner of the COMSAT building would be prevented from making any change or building any new building within the environmental setting.**

In terms of the setting for the COMSAT building, staff has done extensive analysis. Staff has focused particularly on the viewshed of the COMSAT building from I-270, including development of a video of the building from the highway, which will be shown at the worksession. This video, along with a Global Positioning System (GPS), has been used to locate the exact points at which the COMSAT building becomes visible to travelers and when it disappears from sight. The analysis demonstrates that there is a distinct viewshed of COMSAT Laboratories from I-270, whether you allow for peripheral or direct vision, and whether you are traveling north or south. The video also clearly identifies the topography of the site, which includes the building's significant setback, its placement on a knoll, an undulating front lawn, and a slight rise at the site's northern end.

The environmental setting of 33.47 acres recommended by the HPC and included in the Preliminary Draft Amendment is smaller than the setting originally recommended by staff. The HPC looked at a total of five different environmental setting options (staff's memo to the HPC dated April 6, 2005 is attached). The 33.47 acre setting conforms approximately to the GPS coordinates of where the building becomes first visible while traveling northbound on I-270 and

where the view is lost while traveling northbound. According to the GPS coordinates, it includes about ½ of the viewshed visible while traveling southbound on I-270. It excludes right-of-way land that will be needed for future transportation improvements.

This setting preserves elements that contribute to the significance of the COMSAT building (the landscape for which was designed by noted landscape architect and Dean of the Harvard School of Landscape Architecture, Lester Collins), such as the viewsheds, some trees associated with the building since inception, some of the topography that distinguishes the site, and a section of the original Comsat Drive.

There is another alternative setting that is narrower and encompasses 21.39 acres of land (see Alternative #3 in the April 6<sup>th</sup> memo); however, that setting does not conform to the GPS coordinates for when the building becomes visible either northbound or southbound.

### ***Contributing and Non-Contributing Sections of the COMSAT Laboratory Building***

The Preliminary Draft Amendment includes a map that delineates “contributing” and “non-contributing” portions of the COMSAT building. It also includes very specific language about the treatment of different portions of the structure:

*The Commission recommends that the entire existing building be designated, but that non-original portions of the building be identified as non-contributing – and, thus, subject to very lenient review in the event of applications for alteration or demolition. A diagram of the contributing and non-contributing sections of the building is depicted on page 6 of this amendment. In addition, because the relationship to I-270 is a primary historic feature of the COMSAT Laboratories building, the non-public portions of the building that do not face I-270 – particularly sections G, H, 8 and 9 depicted on the attached map that are original parts of the building but that have relatively less artistic merit – should be considered secondary and may have potential for alteration and redevelopment.*

**This means that nearly the entire rear half of the COMSAT building could be removed and/or replaced with new construction. These sections of the buildings are the parts either not designed by Cesar Pelli, or original to the building but utilitarian in nature.**

Staff does not have the technical expertise to fully address a question asked by one Board member about the engineering feasibility of removing the portions of the building noted above. However, from staff’s direct experience with the engineering involved in the construction of the new residential tower above the Bethesda Theatre and the removal of a large section of the Canada Dry building, it is staff’s belief that the design of the COMSAT building (a linear central spine/hall with pods off of it) would lend itself to feasibly allowing removal of the sections noted above. This assumption was also noted by Jef Fuller, HPC Vice-Chair and Managing Principal and President of DNC Architects (a firm that specializes in large office building design).

### ***Compatibility with Master Plan Vision for Site***

Much has been written about the vision for the COMSAT property in the *Approved and Adopted Clarksburg Master Plan & Hyattstown Special Study Area* and staff is providing a copy of this

plan as an attachment to this staff report so that Board members can review the document once more.

It is staff's view that the following points about the development vision for the COMSAT property are most pertinent:

- The COMSAT property was planned as a center for primarily employment. It was and is one of the important "signature sites" along I-270 that will support that road's character as a "high technology corridor". Specific language in the Plan includes:

The Plan assumes a maximum build-out potential of 5 million square feet of employment in this [The Transit Corridor] district. The large amount of employment square footage reflects the buildout of two office parks already partially built and occupied: Gateway 270 and Comsat. This Plan assumes continued build-out of these properties as major employment centers. This Plan caps development on the Comsat site at 2.3 million square feet of employment with the option of increasing development to 4.0 million square feet **if the development pattern is transit-oriented** [emphasis added]. The Plan does recommend a relatively small portion of the Comsat property be changed from employment to residential uses. This portion of the Comsat site is separated from the main campus by a stream valley. For this reason, the transitway is located as close as possible to these employment areas (page 56).

- The ¼ mile circle – that is generally considered the distance that people will walk from transit – around the transit stop planned for the COMSAT area reaches to the southern edge of the existing building. In order to create a transit-oriented employment center, significant employment density must be located within the ¼ mile circle.
- The Master Plan highlighted the state and county's intention to construct two new transportation projects that would greatly affect the immediate surroundings of the COMSAT building: 1) a pair of new interchanges off I-270, just north of West Old Baltimore Road and linked to the new "Little Seneca Parkway" (formerly, Newcut Road Extended); and 2) a Corridor City "transitway" (also referred to as the "CCT") just east of the COMSAT parcel that would connect Clarksburg to Germantown in a north/south direction.
- The Master Plan recommends that up to 50,000 square feet of retail near transit stops. Specific language:

These uses should be dispersed and limited to the first floor of buildings to meet the incidental retail needs of employees and residents. A free-standing shopping center is not envisioned in this area (page 57).

- The Master Plan called for approximately 1,000 dwelling units of housing within the entire Transit Corridor District. Currently, 1,920 units (including existing development) of the proposed 2,790 (end-state) dwelling units have either been approved or are pending approval in the Transit Corridor District.
- The development of the COMSAT property will – by necessity – happen over time and in phases. The building is occupied until 2007, with the possibility of a lease renewal to 2012. The satellite “farm” on a different part of the property is also under lease for a substantial period of time. Thus, development plans and building types need to focus on future potential needs – not simply what is marketable today.

Based on this vision, staff has developed – at the Board’s direction – several concept studies for the redevelopment of the COMSAT site under I-3 and MXPD zoning. **The concept studies are illustrative of one way—perhaps there are many others—that the development program contained in the Master Plan might be accommodated on the site given the range of environmental and land use issues.**

Staff used a number of basic assumptions for these concept studies and attempted to work with the property owner to come to consensus on these assumptions. After one meeting on June 10<sup>th</sup>, however, the owner has declined further meetings with MNCPPC staff.

More detail on the assumptions used and depiction of the four concept studies are shown in the attached memo from Community Based Planning staff that will be discussed in detail at the July 7th worksession.

### ***Adaptive Reuse Potential***

The COMSAT Laboratories building would lend itself to research and development, bioengineering, defense contracting, university classroom space, and many other employment-related uses. The adaptive reuse potential of this building is strong, since in the case of COMSAT, one has an office/research building that remains planned and zoned for office/research uses. While other times it may be difficult to adaptively reuse a historic building because it is converted to a use that is different from the one for which it was constructed (e.g., an office building is converted to a hotel, or an old school is converted to housing), such is not the case at COMSAT. In the case of COMSAT, one has an excellent opportunity for adaptive reuse because there exists on the site an office/research building that is also planned and zoned for office/research uses. Staff believes that the flexible office space in the existing COMSAT building – particularly the contributing sections of the building - can be remodeled to accommodate new office or research uses. **It is important for the Board to remember that historic preservation regulations do not control the interior of a building – new floors can be inserted and interior walls can be either be added or removed.**

Additional ideas have been raised about using the building for other purposes – housing, a school, community meeting space, etc. All of these ideas have merit and might be explored; the University of Maryland School of Architecture has offered to conduct design studios on the development of the COMSAT site and perhaps other schools or groups would as well.

### *Relationship to INTELSAT*

While there is a distinct relationship between COMSAT, the Corporation, and INTELSAT, there is no relationship between the buildings' architecture, other than that both buildings are Modern in spirit. The INTELSAT headquarters building was designed by John Andrews International to conserve maximum amounts of energy and provide natural lighting to the many "office pods" within. The building was constructed in 1987. The District of Columbia's Office Of Planning, Historic Preservation Section is conducting a citywide survey of Modern architecture to identify potential landmarks and INTELSAT is one of the buildings being studied.

### *Conclusion*

Staff recommends amending the *Master Plan for Historic Preservation* to include the COMSAT Laboratories Building in Clarksburg, because this resource meets six of the criteria for historic designation listed in the Historic Preservation Ordinance. Staff recommends that the contributing and noncontributing portions of the building be clearly defined, and that their characterization as such be supported by references to the strength and/or weakness of their scientific/historical and/or architectural associations. Staff recommends that an appropriate environmental setting be selected and the reasoning behind its selection spelled out.

The COMSAT building is not a run-of-the-mill office building along I-270. It was designed by a world-renowned architect, it is one of the first "high-tech" style buildings not only in Montgomery County but in the region, and it was the site of pioneering scientific discoveries that have changed the way each of us lives today. Designation of the COMSAT building would recognize the importance of a building that is the "crème de la crème" of a genre – it would not set a precedent for designating every office building along I-270, as has been asserted. As has been stated previously, we don't have buildings of this caliber spread throughout the county or throughout the state.

Staff firmly believes that the Master Plan vision for development of this property can be accomplished with the retention of the COMSAT building – and that the resulting design will not only meet the Master Plan recommended densities, but will also create a unique corporate campus that will truly be a "signature" site.

Finally, staff would ask that the Board consider all options for protecting the COMSAT building – including placement on the *Master Plan for Historic Preservation* and/or possible placement on the *Locational Atlas*. Placement on the *Locational Atlas* would prevent the building from demolition and would allow the Board to revisit the issue of historic designation when a development plan for the property is reviewed by the Board.