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HEARING

BEFORE THE

SUBCOMMITTEE ON BUILDINGS AND GROUNDS

OF THE

COMMITTEE ON PUBLIC WORKS

UNITED STATES SENATE

NINETY-FOURTH CONGRESS

FIRST SESSION

ON

S. 865

A BILL TO PROMOTE MORE EFFICIENT USE OF THE NATION'S CONSTRUCTION RESOURCES, TO FOSTER THE PRESERVATION OF BUILDINGS OF HISTORIC OR ARCHITECTURAL SIGNIFICANCE, AND TO ENHANCE THE SOCIAL AND ECONOMIC ENVIRONMENT WITHIN AND SURROUNDING FEDERAL OFFICE BUILDINGS

MAY 19, 1975

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# PUBLIC BUILDINGS COOPERATIVE USE ACT OF 1975

MONDAY, MAY 19, 1975

U.S. SENATE,  
COMMITTEE ON PUBLIC WORKS,  
SUBCOMMITTEE ON BUILDINGS AND GROUNDS,  
*Washington, D.C.*

The subcommittee met at 10 a.m., pursuant to call, in room 4200, Dirksen Senate Office Building. Hon. James L. Buckley presiding, Present: Senators Buckley and Gravel.

## OPENING STATEMENT OF HON. JAMES L. BUCKLEY, U.S. SENATOR FROM THE STATE OF NEW YORK

Senator BUCKLEY. Will the hearing come to order.

As we have a rather large witness list, I suggest that we begin with a panel of Miss Nancy Hanks, Chairman of the National Endowment for the Arts, and Mrs. Nancy Shipley, Vice Chairman of the Advisory Council on Historic Preservation.

The legislation before us today seeks to make the Federal Government a better neighbor in the cities of our Nation. It is legislation that seeks to conserve energy and natural resources, while producing new jobs.

I believe we can achieve these goals by adding flexibility to the way the Federal Government acquires and uses its office buildings. Specifically, our bill authorizes two new options. It would encourage renovation—"recycling" might be better word—of existing buildings into new Federal offices, where that is appropriate.

This approach, I believe, would help us recapture some of the beauty of our heritage, making our cities more livable by fostering continuity and progress.

This approach would save energy, using the designs of older buildings that are less extravagant in energy use than most present buildings. And it would usually prove cheaper than replacement construction. Finally, it is often work that can be accomplished more expeditiously than wholesale demolition and replacement.

It is not my intent to argue the merits or demerits of a tax structure that seems to encourage the destruction of the old, with its replacement by either a new building or a parking lot. Rather, I believe the Federal Government must set an example, an example that other units of government may follow and seek to encourage.

This is not an effort to select an occasional historic building and then renovate it. I would anticipate that the Federal Government would find opportunities for renovation in many older, rundown office

buildings, warehouses, railway stations, theaters, and so on, and turn them into productive office space.

I am convinced that this approach would encourage the spending of the taxpayers' money in a wise and frugal way. But I might add, any effort to utilize older buildings would also have the salutary effect of slowing the push toward the consolidation of all Federal offices in one towering monolith per city.

We must question whether the public is best served by locating the local Secret Service office across the hall from the local Forest Service office, or whether their placement in smaller buildings around the city isn't a wiser course.

Our bill would also allow, for the first time, the cooperative, private-public use of space in Federal office buildings. This bill seeks to bring the public back into our public buildings. It seeks to breathe new life into Federal buildings.

I am convinced that we must open up our Federal buildings, encouraging public use of what they have paid for. The recent staff report to the Federal architectural task force sought to encourage a more lively pedestrian setting in and around these buildings.

Section 4 of the bill, by amending section 210 of the Federal Property and Administrative Services Act of 1949, would grant GSA authority to lease ground floorspace of Federal office buildings for commercial, cultural, educational, or recreational uses.

Whether with signs or designs, we place "No Trespassing" at the entrances to most Federal office buildings. It is sad to note that no one visits a Federal office building except on business. That must be changed.

An article in the Christian Science Monitor expressed it well:

The Public Buildings Cooperative Use Act may seem somewhat peripheral to many Americans during these perilous days, but it embodies the essence of the relationship between people and government. By engaging a wider spectrum of activity, not for just eight hours a day but into our evenings too, and by making good use of the buildings we already have, this bill would have a beautiful bearing on the way our downtowns look from now on, and on the way we think about and use the resources of government.

Such cooperative use of ground floorspace would, of course, serve the employees of the building. It would serve the visting public. Most significantly, I believe, they would bring new life, new activity, and new vitality to the blocks around that Federal office building.

I am pleased to say that this bill has the cosponsorship of both the chairman and the ranking minority member of the full committee, and the chairman of the Buildings Subcommittee.

[The bill, S. 865, follows:]

94TH CONGRESS  
1ST SESSION

## S. 865

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### IN THE SENATE OF THE UNITED STATES

FEBRUARY 27 (legislative day, FEBRUARY 21), 1975

Mr. BUCKLEY (for himself, Mr. BAKER, Mr. MORGAN, and Mr. RANDOLPH) introduced the following bill; which was read twice and, by unanimous consent, referred to the Committee on Public Works

---

## A BILL

To promote more efficient use of the Nation's construction resources, to foster the preservation of buildings of historic or architectural significance, and to enhance the social and economic environment within and surrounding Federal office buildings.

1        *Be it enacted by the Senate and House of Representa-*  
2        *tives of the United States of America in Congress assembled,*  
3        That this Act may be cited as the "Public Buildings Coopera-  
4        tive Use Act of 1975".

5        SEC. 2. (a) In order to carry out his duties under this  
6        Act and under any other authority with respect to operating,  
7        maintaining, altering, and otherwise managing or acquiring  
8        space to meet the office needs of the Federal Government

1 and to accomplish the purposes of this Act, the Adminis-  
2 trator shall—

3           (1) acquire and utilize space in suitable buildings  
4 of historic or architectural significance, unless use of such  
5 space would not prove feasible and prudent compared  
6 with available alternatives;

7           (2) give preference, after first complying with  
8 paragraph (1) of this subsection, to the purchase and  
9 use of space in other existing buildings unless use of such  
10 space would not prove feasible and prudent compared  
11 with available alternatives;

12           (3) encourage the location of commercial, cultural,  
13 educational, and recreational facilities and activities  
14 within or near public buildings;

15           (4) provide and maintain space, facilities, and ac-  
16 tivities, to the extent practicable, that encourages public  
17 access to and stimulate public pedestrian traffic around,  
18 into, and through public buildings, complementing and  
19 supplementing commercial, cultural, educational, and rec-  
20 reational resources in the neighborhood of public build-  
21 ings; and

22           (5) encourage the public use of public buildings,  
23 including commercial, cultural, educational, and recrea-  
24 tional use of such buildings outside of regular Federal  
25 working hours.

1           (b) In carrying out his duties under subsection (a) of  
2 this section, the Administrator shall consult with Governors,  
3 areawide agencies established pursuant to title II of the  
4 Demonstration Cities and Metropolitan Development Act  
5 of 1966 and title IV of the Intergovernmental Cooperation  
6 Act of 1968, and chief executive officers of those units of  
7 local government in each area served by an existing or pro-  
8 posed public building, and shall solicit the comments of such  
9 other community leaders and members of the general public  
10 as he deems appropriate.

11       SEC. 3. The Public Buildings Act of 1959 is amended—

12           (1) by striking at the end of section 7 (a) (3), the  
13 word "buildings;" and inserting in lieu thereof "build-  
14 ing, and designed to enhance the architectural, histori-  
15 cal, social, and economic environment of the locality;"

16           (2) by striking the word "and" at the end of sec-  
17 tion 7 (a) (4), by redesignating section 7 (a) (5) as  
18 section 7 (a) (6), and by inserting the following new  
19 section 7 (a) (5) :

20           “(5) whenever a project proposed in the prospectus  
21 does not provide for acquisition or purchase of the build-  
22 ing or buildings identified to the Administrator pursuant  
23 to section 12 (c), a statement of the economic and other  
24 justifications for not acquiring or purchasing such build-  
25 ing or buildings; and”;

1           (3) by redesignating section 12 (c) and section  
2           12 (d) as section 12 (d) and section 12 (e), inserting  
3           the following new section 12 (c) :

4           “(c) Whenever the Administrator undertakes a survey  
5           of the public buildings needs of the Federal Government  
6           within a geographical area, he shall contract with the Chair-  
7           man of the National Trust for Historic Preservation to  
8           identify any existing buildings within such geographical areas  
9           which are of architectural or historical interest and which  
10          would be suitable, whether or not in need of repair, alteration,  
11          or addition, for acquisition or purchase to meet the public  
12          buildings needs of the Federal Government.”.

13          SEC. 4. (a) The Federal Property and Administrative  
14          Services Act of 1949 is amended—

15           (1) by striking the word “and” at the end of  
16           section 210 (a) (14), and adding the following para-  
17           graphs following section 210 (a) (15) :

18           “(16) to enter into leases of space on the ground  
19           floor of any public building with persons, firms, or  
20           organizations engaged in commercial, cultural, educa-  
21           tional, or recreational activities. The Administrator shall  
22           establish a rental rate for such leased space equivalent to  
23           the prevailing commercial rate for comparable space  
24           devoted to a similar purpose in the vicinity of the public  
25           building. Such leases may be negotiated without com-

1       petitive bids, but shall contain such terms and conditions  
2       as the Administrator deems necessary to protect the  
3       public interest;

4               “(17) to make available, on occasion, or to lease  
5       at such rates and on such other terms and conditions as  
6       the Administrator deems to be in the public interest,  
7       auditoriums, meeting rooms, courtyards, rooftops, and  
8       lobbies of public buildings to persons, firms, or organiza-  
9       tions engaged in commercial, cultural, educational, or  
10      recreational activities that will not disrupt the operation  
11      of the building;

12              “(18) to deposit into the fund established by sub-  
13      section (f) of this section all sums received under leases  
14      or rentals executed pursuant to paragraphs (16) and  
15      (17) of this subsection;

16              “(19) to pay sums in lieu of real property taxes to  
17      States and units of local government on any space leased  
18      pursuant to paragraph (16) or (17) of this subsection,  
19      to persons, firms, or organizations otherwise subject to  
20      taxation; and

21              “(20) to furnish utilities, maintenance, repair, and  
22      other services to persons, firms, or organizations leasing  
23      space pursuant to paragraphs (16) and (17) of this  
24      subsection. Such services may be provided during and  
25      outside of regular working hours of Federal agencies.”.

1 (b) The Federal Property and Administrative Services  
2 Act of 1949 is amended by adding at the end of section 210  
3 (e) the following: "The Administrator shall, where prac-  
4 ticable, give priority in the assignment of ground floor space  
5 not leased under the terms of subsection (a) (16) or (a)  
6 (17) of this section in such buildings to Federal activities  
7 requiring regular contact with members of the public. To  
8 the extent ground floor space is unavailable, the Adminis-  
9 trator shall provide space with maximum ease of access to  
10 building entrances."

11 SEC. 5. As used in this Act—

12 (1) The term "Administrator" means the Adminis-  
13 trator of General Services.

14 (2) The terms "public building" and "Federal agency"  
15 bear the same meaning as the Public Buildings Act of 1959.

16 (3) The term "unit of local government" means any  
17 city, county, town, parish, village, or other general purpose  
18 political subdivision of a State.

19 (4) The term "historical or architectural significance"  
20 includes, but is not limited to, buildings listed or eligible to  
21 be listed on the National Register.

22 (5) The term "commercial activities" includes, but is  
23 not limited to, restaurants, food stores, craft stores, dry goods  
24 stores, financial institutions, and display facilities.

1           (6) The term "cultural activities" includes, but is not  
2 limited to, film, dramatic, dance and musical presentations,  
3 fine art exhibits, studios, and public meeting places, whether  
4 or not used by persons, firms, or organizations intending to  
5 make a profit.

6           (7) The term "educational activities" includes, but is not  
7 limited to, libraries, schools, laboratories, and lecture and  
8 demonstration facilities.

9           (8) The term "recreational activities" includes, but is  
10 not limited to, gymnasiums and day care centers.

Senator BUCKLEY. That concludes my opening statement. Would the witnesses like to proceed?

STATEMENTS OF NANCY HANKS, CHAIRMAN, NATIONAL ENDOWMENT FOR THE ARTS, ACCOMPANIED BY BILL LACY, DIRECTOR OF ARCHITECTURE AND ENVIRONMENTAL ARTS FOR THE NATIONAL ENDOWMENT FOR THE ARTS AND EXECUTIVE DIRECTOR OF THE FEDERAL ARCHITECTURE TASK FORCE; LOIS CRAIG, STAFF DIRECTOR OF THE FEDERAL ARCHITECTURE PROJECT, AND NANCY SHIPLEY, VICE CHAIRMAN, ADVISORY COUNCIL ON HISTORIC PRESERVATION; AND ROBERT R. GARVEY, JR., EXECUTIVE DIRECTOR OF THE COUNCIL

Miss HANKS. Senator Buckley, I believe you said you would prefer our answering questions rather than making statements. We have submitted, or at least I have submitted, a statement for the record. I would like, if I might, to make two or three very brief comments in connection with the legislation that we are hearing today.

Senator BUCKLEY. Your statement will be printed in the record.

Miss HANKS. Thank you very much.

[The statement appears at p. 12.]

Miss HANKS. The National Endowment for the Arts and also the architecture task force, on which Senator Baker and Congressman Thompson incidentally sat, would strongly support this legislation.

I think, sir, not only are those very important points that you raise in your own remarks about the economic factors, about the livability of our cities, and about putting our Government more in touch with our people, I would like to say it is not only the details of the legislation that you are presenting today but, sir, it is also an attitude that is very important—of government toward its people and toward its environment in a city.

I would like to make two points. In connection with multiple use, that would make our government buildings more a part of the lives not only of the government workers but of the people in the cities. In connection with adaptive use, it would make the government join with private citizens all over this country who want to preserve their cities.

It is a positive attitude by the Federal Government toward the people, toward the cities. I strongly commend you and your associates for this piece of legislation.

We have only actually three comments to make, if I might, on the legislation itself, other than very strong applause. We would like the committee to consider in connection with the adaptive use section of the bill, the possibility that the GSA Administrator be authorized to lease space in old buildings as well as just to purchase them.

Second, we believe that it would be helpful if there were more specifically articulated guidelines and limitations on the policy of consolidating Federal offices, a point you strongly make in your opening statement. We think the legislation could help very much in that regard.

In connection with the multiple-use provisions, we would like the committee, if possible, to seriously consider removing the limitation on ground floorspace.

We believe there might be instances, indeed many, in which the mezzanine or second floors, perhaps rooftops of the buildings, might be used for multiple use.

Those are three technical changes we would like to see in the legislation. Other than that, sir, and with my written testimony, I thank you very much.

Senator BUCKLEY. Thank you, Miss Hanks.

Do you have any specific thoughts on where to draw the line? Would you recommend language that explicitly allows leasing of the mezzanine or rooftop area?

Miss HANKS. No. I would just open it up. I would think the marketplace in effect would say what space was needed. Every town and city will be different. I think, therefore, if you just open it up, GSA's negotiations in the cities and States would work it out.

Senator BUCKLEY. Some people have suggested that GSA should not be required to limit bids to competitive bidding. Do you have any thoughts on that?

Miss HANKS. No. Bill Lacy, who is director of our architecture program and is here with me today, might answer the question better than I.

I would have no comment on competitive bidding. I don't know if you wish to have any other staff comments at the present time.

Senator BUCKLEY. Mr. Lacy, would you come up and join the group?

Miss HANKS. Mr. Lacy is Director of the Architecture and Environmental Arts for the National Endowment for the Arts and executive director of the Federal task force on architecture.

Mr. LACY. Mr. Chairman, I can't shed a great deal of light on the question. We are really more interested in the intent of the bill than the specific way in which it would be administered.

My feeling on the matter is that we should follow procedures already operative in the marketplace whether that deals with the competitive or noncompetitive. I think that is properly the jurisdiction of the GSA Administrator in working out the specific details of how this bill should be administered.

In the same tone, I agree with Miss Hanks, that we should not fix rigidly the requirements for opening up Federal buildings to non-Federal uses; but, rather, test the idea and see how it is most easily accommodated in existing real estate accepted procedures that now exist.

Senator BUCKLEY. Thank you very much.

[Miss Hanks' statement follows.]

Statement of  
Nancy Hanks  
Chairman, National Endowment for the Arts

on

S. 865, the Public Buildings  
Cooperative Use Act of 1975

before the

Subcommittee on Buildings and Grounds  
Committee on Public Works of the U.S. Senate

May 19, 1975

Mr. Chairman, it is a special pleasure for me to be here to testify on S. 865, the "Public Buildings Cooperative Use Act of 1975." In doing so, I am wearing two hats today, one as Chairman of the National Endowment for the Arts and another as the person charged by the President with responsibility for the Federal Design Improvement Program.

As you know, in 1972, the President asked the National Endowment for the Arts to take charge of a program to improve the Federal Government's design activities. One facet of that program was to be a revision and expansion of the Guiding Principles for Federal Architecture, issued in 1962. To carry out this aspect of the design program, we appointed at the President's request a task force composed of eminent private design professionals and two concerned members of Congress, one of whom was Senator Baker, the other was Representative Frank Thompson. We also assembled a group of architects from 20 Federal agencies with major construction responsibilities to draw on their special knowledge as we conducted our research. I will discuss the excellent work of the Federal Architecture Task Force in a little while; but I would like to say now that the inter-agency group has proven to be an invaluable source of information, ideas, and enthusiasm. These Federal designers are professionals in the best sense of the word: They are expert and imaginative and they place the public interest in the forefront of their thinking. The agency representatives tell us that we in turn perform a valuable service to them and their agencies by providing a forum for the exchange of information and the crossbreeding of ideas.

Staff support to the Federal Architecture Task Force and inter-agency group is provided by the Federal Architecture Project. With me here this morning are Mr. Bill Lacy, Director of the Architecture + Environmental Arts Program of the National Endowment for the Arts and Executive Director of the Federal Architecture Project, and Mrs. Lois Craig, Staff Director of the Project.

The Federal Architecture Task Force, like the group convened ten years before that produced the Guiding Principles, made no attempt to define an appropriate style for Federal architecture. We have long since passed the time when it was thought necessary for every public building to recall the glories of ancient Greece and Rome, although we rightly cherish the architectural legacy those times have bequeathed us. Instead, the Task Force broadened the focus of its work beyond the building itself to include the processes that produce the building and its impact on users, visitors, and its physical and socioeconomic environment.

In April 1974, the Task Force issued an interim report, entitled Federal Architecture: A Framework for Debate, containing its findings and a series of recommendations for improving Federal architecture. Since that time, at the direction of the Task Force, the staff of the Federal Architecture Project has prepared supplementary reports on two of the most important recommendations, recommendations which S. 865 would implement: cooperative -- or multiple -- use, and recycling of buildings -- or adaptive use. I would like to submit those two reports

entitled Federal Architecture: Multiple-Use Facilities and Federal Architecture: Adaptive-Use Facilities for the record. Along with Senator Buckley's succinct floor statement accompanying his introduction of S. 865, they state the case for cooperative use and recycling as forcefully as possible and describe our reasons for strongly supporting the bill.

I would like to highlight only a few points made in those documents and to add some comments on the practical implications of this bill. As to some of its technical aspects, I defer to the experts at the General Services Administration, the Advisory Council on Historic Preservation, the National Trust for Historic Preservation, and the others testifying today.

Senator Buckley noted that the basic problem in Federal architecture was summed up by Professor J. B. Jackson of Harvard in a quote used to introduce the multiple use report: "No one in his right mind now goes into a public building except on business." The problem is one of both visual image and physical access.

Writing last year about new buildings on the Mall and the FBI building, Russell Baker of the New York Times commented, "Man is out of place in these ponderosities. They are designed to make man feel negligible...." The point is, our "public" buildings are like signs, advertising the kind of people and government we are. In this case, they are false advertising: Our government is not distant and aloof; it is an open government, sensitive to the needs and desires of its people. But our buildings, those permanent, attention-getting symbols of the Federal presence, do not always show that.

Some people say that as impenetrable as some of our buildings appear, most of the public has little need to visit inside them. Unfortunately, even where our agencies conduct activities that require frequent contact with the general public, they are often so inconveniently located that it is hard to believe that the public is welcome. I have been told, for instance, that the Government Printing Office bookstores in Federal buildings in Boston and Cincinnati are located in sub-basements and that even the building guards have trouble giving directions to visitors seeking them. And I was startled to read in the April issue of the Eastern Airlines inflight magazine an article about bargain-hunting in Washington which contained the following comments:

With few exceptions, Washington's best buys are found in the nonprofit gift shops operated by the Federal Government.

Locating them is the hard part.

Take the Commerce Department, for example. For bargains, nothing can match the Government Bookstore housed here. But plan to ask at least three guards for directions. It has to be the most-difficult-to-locate bookstore in the world!

At the Library of Congress you'll find a selection of Americana posters.... The Library is a snap to locate, but the gift shop -- again -- seems to have been purposely hidden.

The real bargain at the Library of Congress is its collection of recordings. Finding the gift shop won't help you here because recordings are sold through the Recording Laboratory housed -- you guessed it -- in an out-of-the-way office tucked into a basement corner.

Indian crafts are to be found at the Department of the Interior, another out-of-the-way building with both a gift shop and museum buried in its bureaucratic corridors.

I am delighted to see that Section 4(b) of S. 865 would correct this situation.

If you read the recommendations of the Task Force as a whole, you will see these issues of public image and public access were very much on the minds of the task force members. They concluded that the Federal Government has an obligation to provide buildings which demonstrate that government is not a remote control system run from Washington and which emphasize the Federal Government's accountability to its local constituencies by contributing to the improvement of their environment, socially, economically, and visually. And they further concluded that adaptive use and multiple use can be keys to helping the Government meet that obligation. I will try this morning to explain why.

Mr. Chairman, there are others here who are much more knowledgeable than I in the complexities of turning old buildings into contemporary uses. I will only make a few general observations.

Old buildings are like old friends. They connect us to our past. Yet at the same time, they are a vital part of our present because they assure us of a certain stability and continuity in times of rapid change. It is for just this reason that they should house the Federal Government's activities. They very often perfectly fit the 1962 Guiding Principles description of an appropriate Federal architecture style as one "... which is distinguished and which will reflect the dignity, enterprise, vigor, and stability of the American national government."

Reuse of old buildings also accords with a lost American ethic which we are trying to recapture, one expressed in the New England proverb, "Use it up, wear it out, make it do, or do without." In his address to state historic preservation officers in February, the Secretary of the Interior said that it is now an accepted fact that adaptive use is far more economical in its use of energy and natural resources than new construction. These comparative resource and energy savings have not yet been accurately measured, however, and they are often overlooked. The Endowment hopes to contribute to an inter-agency effort to undertake such measurements in the near future.

Because buildings represent investments and their sites economic opportunity, many older buildings have fallen victim to faulty economic reasoning that considers only some obvious costs of renovation without considering some not-so-obvious savings. Compared to new construction, adaptive use projects provide more jobs, require no demolition and site clearance, and use less structural and other construction materials. They are, moreover, completed faster, resulting in lower borrowing costs and less time that the site remains economically idle. These economic advantages need to be quantified and publicized.

In addition, there are some indirect benefits attributable to re-use projects which we may never be able to measure quantitatively. These include revitalization of surrounding neighborhoods and thus increased revenues for local governments, as well as heightened civic pride.

I am very pleased to see that this bill encourages recycling of those buildings which we do not normally think of as architectural landmarks. They too, signify continuity, and more importantly, are resources to be conserved if at all possible. In Salt Lake City, trolley barns have been turned into a successful shopping center; in Akron, grain silos, of all things, are being turned into apartments and offices.

It may be helpful to clarify two items in the bill as it is written in order to allow the Federal Government to take maximum advantage of adaptive use. First, it is not clear whether the Administrator is to give the same priority to older buildings in leasing space for the Federal Government as he is in direct acquisition of space. The Government's rent payments can help a private owner to maintain an old building currently in good condition, while the Government's commitment to enter into a lease can provide the owner of a rundown building with the leverage to obtain private rehabilitation financing. Moreover, private restoration looking forward to a Federal Government tenancy will have to provide for elimination of architectural barriers to the handicapped.

Second -- and Senator Buckley's statement indicated he is already aware of this factor -- the Government's policy of office consolidation must be re-examined so we can make the most use of the many smaller, older buildings that establish a human-sized scale in our cities. The trend in recent years has been to round up all the Federal workers in a metropolitan area into one large central office complex. There is undoubtedly a point beyond which the proliferation of separate office buildings causes an increase in maintenance, communication and protection costs. On the other hand, placing Federal office space in one structure must sometimes take us beyond the point where economists would say we are achieving a return to scale. In other words, we may be able to operate three or four medium-sized office structures in a metropolitan area as cheaply as a single giant-sized one. The one-building concept may also over-consolidate in terms of convenience to the public and the

need for inter- or intra-agency communication. People with business at Environmental Protection Agency offices seldom need to see officials of the Bureau of Labor Statistics -- at least not on the same day. Nor do the officials of these two agencies need to be in continuous contact.

This is not a new issue. As early as 1860, the engineer in charge of the Treasury Department's Construction Bureau (a forerunner of GSA), pointed out "the impolicy of combining a courthouse and post office under the same roof in a large city," since the courts required a quiet location and the post office a location in the noisy business district. In 1905, the Secretary of the Treasury's annual report warned that placing a large city post office in the same building with a combined courthouse and customhouse involved "disproportionate appropriations."

As currently written, S. 865 would not prohibit use of several older buildings to satisfy Federal space needs in an area. However, it may be advantageous to add a provision indicating when consolidation of Federal offices in a metropolitan area would not be desirable.

The Federal Architecture Task Force was thoroughly convinced that adaptive use office buildings would improve the public image of the Federal Government in communities across the Nation. The Task Force concluded that multiple use holds even greater potential for demonstrating a commitment to open and accessible government, local economic welfare and sound urban land-use principles.

Under the provisions of S. 865, multiple use could be accommodated throughout the public building inventory. Adaptive use projects, existing office and court complexes, and new construction undertakings could all be outfitted with facilities to house commercial, cultural, educational, and recreational activities. Needless to say, not every Federal building can support the entire range of uses; some, because of location or purpose, may be able to accommodate only regular office activities. Each situation is unique and will have to be evaluated in the context of its setting.

Multiple use is not a new idea, of course. It is simply a new name for a familiar principle of urban land use. As an editorial in Architectural Record magazine recently asked, "Why shouldn't the Government live over the store?" For centuries, cities featured a jumble of housing, shops, workplaces and social centers in close proximity. Many people are now convinced that this mixture of uses was responsible for the charm, vitality, and attractiveness of city life. They are probably right. We should remember, however, that this mixture came about, not from any conscious attempt to make cities "charming," but rather as a solution to the problem of providing the necessities of life with a slow-moving transportation system. The transportation problem ought to strike a chord with us again today. We have just recently recognized the transportation and energy costs of our pattern of urban sprawl and segregated land uses. I don't think any of us doubt that the Federal Government must do whatever it can to contribute to reducing those costs.

Moreover, multiple-use buildings are often used more intensively, and that conserves urban land. In normal practice, our Federal office buildings stand empty after working hours and on weekends. Nightlife and weekend activities go on in other buildings. If the office and after-hours activities are accommodated in the same structure, however, the pressure on urban land and consequently on the open land surrounding our cities is lessened.

Section 2(a)(5) of S. 865 would encourage such intensive use of Federal buildings. It could be one of the most significant provisions in the bill, if implemented vigorously. It can turn Federal buildings into active centers of community life. As Chairman of the National Endowment for the Arts, I have to point out the potential this provision particularly holds out for the arts. Many of our Federal buildings contain auditoriums and other public rooms which, with minor alterations, could furnish space for performing arts productions. Films, concerts, and, with more substantial modifications, theatre and dance performances can be presented in rooms which during the workday are devoted to training sessions, meetings, and hearings. Of course, when not being used for cultural activities, these same rooms can be used after hours for meetings of local civic organizations or governmental bodies.

As with adaptive use, the resource and energy savings that can be attributed to multiple use are not as apparent as the straightforward commercial arguments in its favor. We know of one instance in which a Midwestern town pleaded with the Federal Government to provide space for commercial activities in its new office building. The building was in the middle of a redevelopment tract which had been carefully planned as a pedestrian shopping area. All other new buildings in the area were required to include lower floor shopping space. The town was very concerned that the Federal building, which occupied a large and strategic site, would disrupt the flow of shoppers. Federal officials had to sadly inform town planners that no authority existed to allow stores in the building and it stands today as an isolated, forbidding presence in an otherwise lively street. This is not an aesthetic problem; it is an abdication of the Government's clear economic and social responsibilities.

It was to just such complaints from businessmen that the Canadian Government responded with an ambitious multiple-use program. Told by merchants that its single-use office buildings were "dead spaces" in the swirl of city activity and were damaging to business in their neighborhoods, the Department of Public Works began designing new buildings with built-in space for stores and restaurants and established an office to actively market the space. The Department tells us that it has had no complaints about its entry into the commercial rental market. Department representatives even participate in the activities of local merchants associations.

Unfortunately, leasing out space for commercial, cultural, educational, and recreational activities is not simply a matter of hanging

out a sign saying, "space to let" and assigning leases on a first-come, first-served basis. Careful planning is required to make sure that the multiple-use program accomplishes its goal of enhancing the urban environment. Fortunately, experience in the private sector can be relied on to guard against most pitfalls.

The Canadians admit quite candidly, for example, that their first multiple-use project got into difficulty at first. It was a new building in a depressed area with little existing daytime office or commercial activity. Commercial tenants were moved into the new building before the Government's office workers. With no available clientele, many of the small shops had to vacate. The Department of Public Works now pays careful attention to the problem of phasing in its tenants.

It is also important to ensure an appropriate mix of activities. Certain types of retail activities and restaurants act as drawing cards to passersby to the benefit of other, less instantly tempting facilities. These drawing cards have to be included in any substantial commercial scheme. On the other hand, some activities, though legal, might detract from the dignity of the Federal Government and offend a part of the public. They should be excluded.

Other activities, like banks and travel agencies, are normally open only during office hours and should not be allowed to take up too great a portion of the available space.

The supply of and demand for commercial, cultural, educational, and recreational activities have to be studied in each situation. Private owners do not execute leases with stores or other facilities that have little chance of economic survival, since frequent turnovers raise administrative expenses and discourage customers. Activities in the leased space in Federal buildings will have to be keyed to the demands of two groups: the general public and Federal office workers. Some facilities that might not otherwise be encouraged to lease based on a strictly external market analysis, should nevertheless be sought for the benefit of our civil service employees. Athletic and recreational facilities, for example, are too seldom provided in our office buildings, despite their potential contribution to employee health, morale, and effectiveness. Attention must be paid, of course, to the rates charged by private health facilities. They may be too high to allow the bulk of the employees to enjoy their use. On the other hand, some care will have to be taken to ensure the commercial soundness of the Randolph-Sheppard Act program. Perhaps the vending stands could be provided lower floor space in accordance with Section 4(b) of the bill.

Making public buildings inviting to the public involves more than just providing a mix of activities inside them. If pedestrians are to be attracted to them, as S. 865 encourages, and as profit-seeking tenants demand, the buildings themselves have to be designed to act as magnets. Fountains, plazas that direct movement toward the building, prominent entrances, information kiosks, signs, and banners can capture the attention of people passing by.

Building managers can increase this magnetic effect by programming free activities in indoor and outdoor public spaces. Boston's City Hall -- which does not incorporate multiple uses of the sort we are talking about, but which is a good example of a public building that actually welcomes the public -- is the setting for a year-round festival. During the summer, its outdoor plaza, which was designed as a small amphitheatre, is the scene of orchestra and jazz concerts, folk dance and ballet programs, sculpture exhibits, and an annual Fourth of July celebration. Indoors at City Hall, there are painting, photography, sculpture, and tapestry exhibits, fashion shows, receptions, a Christmas Tree festival, and countless choral, band and organ concerts. I know you all understand how such events can enliven a building; I've often stopped to listen to the choral concerts that your constituents present in the lobbies of the Senate Office Buildings, not to mention the numerous events on the steps of the Capitol.

None of us want to make Federal buildings inviting to those who would disrupt the activities of their offices. Some people have expressed the fear that multiple-use Federal buildings will be more susceptible to disruption or bombing, since more people will be passing through them. That is a genuine concern. Careful attention to design, however, can allay these fears. The new J. Edgar Hoover Building, which has been criticized by some as an example of a Federal building that detracts from the commercial and street environment around it, does, in fact, incorporate a circulation system for its visitors that prevents them from wandering into security-sensitive areas of the building. If this security problem can be solved in the headquarters of the FBI, I dare say it can be solved in most other Federal buildings.

Finally, while it is not a primary reason for advocating employment in Federal buildings, multiple use should result in a net financial return to the Federal Building Fund. S. 865 requires that rental rates be equivalent to prevailing commercial rates, which normally yield a profit after overhead, utilities and the like are subtracted. At those rates, it is estimated that the 39,000 square feet of restaurant and retail space in the Federal Home Loan Bank Board headquarters now under construction will command a gross rental of \$529,000 per year. A local Washington real estate developer informs me that commercial rentals vary according to different uses of the leased space. Some institutional users carry a relatively high-fixed charge, while many retail users pay a percentage of gross sales in addition to a relatively low-fixed rent. The fortunate aspect of this rent structure is that it amounts to a built-in subsidy. By leasing a small portion of space to a high-rent use, one can rent other space to achieve an interesting mixture of activities and still more than cover maintenance and utility expenses on the entire space.

I would like to suggest only one small, but important, revision in the multiple-use provisions of the bill. As presently written, only ground floor space can be leased on a semi-permanent basis. This provision would preclude, for example, leasing rooftop space to a restaurant

or basement space for athletic facilities. It would also preclude a two-level shopping area like the mezzanine proposed for the new Federal Home Loan Bank Board building. Since these non-ground level features have been successful elsewhere, I think it would be a mistake to limit design and rental options to ground floor space only.

Although I have spoken of them separately, adaptive use and multiple use are best combined, with mutually beneficial results. Many rehabilitation projects are made economically feasible by including multiple uses in the adapted buildings. Multiple-use facilities gain patronage by being located in adapted old buildings which are both familiar and intriguing to the public.

Mr. Chairman, we are deeply gratified that the work of the Federal Architecture Task Force has borne this fruit. The National Endowment for the Arts strongly supports S. 865. We believe it will reflect in our public architecture the same impulse to more open communication between the Government and the governed that we see in so many other areas of contemporary public affairs. Thank you for giving me the opportunity to speak to you in behalf of S. 865.

Senator BUCKLEY. Mrs. Shipley, would you care to give us your views on this legislation?

**STATEMENT OF NANCY K. SHIPLEY, VICE CHAIRMAN, ADVISORY COUNCIL ON HISTORIC PRESERVATION**

Mrs. SHIPLEY. I am Nancy Shipley, Vice Chairman of the Advisory Council on Historic Preservation. With me today is Robert R. Garvey, Jr., Executive Director of the Council.

You are hearing, of course, today from Miss Hanks and others on the relationship of this bill to the part played by the Federal Government, and I would just like to address today some specific sections of the proposed bill that are of most concern to our Council.

At its recent meeting on May 7 and 8, the Advisory Council reviewed the proposed bill and voted unanimously to endorse its early enactment. The Council finds that the bill is consistent with the congressional declaration in the introduction to the National Historic Preservation Act of 1966 that, "The historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people."

In testimony before you today, you have heard, or will hear, comments concerning the relationship of this bill to a "good neighbor" policy of the Federal Government, to revitalization of urban areas, to energy and resource conservation, and to labor intensive employment.

The Council supports these positions and rather than restate them for you, I would like to address specific sections of the proposed bill of most concern to the Council.

Of critical importance to effective implementation of the bill is the determination by the Administrator of whether it is feasible and prudent to utilize existing buildings of historical, architectural or cultural significance.

Similar language exists in section 4(f) of the Department of Transportation Act and has been the subject of extensive judicial scrutiny.

The Council believes that it is most important that the legislative history of this bill reflect that determination under section 2(a) (1) be adequately documented and take into account factors which are difficult to quantify; specifically, the historical, architectural, or cultural importance of existing buildings and their contribution to the community.

A pure cost-benefit analysis, based on cost per square foot, may indeed not accurately reflect the true costs and benefits to our society of utilizing or not utilizing an existing structure.

In this regard, it should be noted that pursuant to the National Historic Preservation Act of 1966, the Advisory Council is charged with the responsibility of advising Federal agencies on the public interest involved in their activities affecting historic resources.

Therefore, it seems appropriate that the comments of the Council be obtained by the Administrator of the General Services Administration in order to assist him in making determinations as to the feasibility and prudence of utilizing existing historically, architecturally, or culturally significant structures.

The Council also notes that the present national historic preservation program is essentially a partnership between the Federal Government and the States. Pursuant to the National Historic Preservation Act, and at the request of the Secretary of the Interior, the Governor of each State has appointed an official to serve as State reservation officer.

In furtherance of this partnership, the Council suggests that the State historic preservation officers be named in the list of officers to be consulted by the Administrator.

The next element of the bill of concern to the Council is the requirement that the Administrator identify existing structures of historical, architectural or cultural significance.

The bill as proposed limits the Administrator to contracting with the chairman of the national trust for all identification activities. The Council is concerned that limiting identification activities to the national trust exclusively fails to take advantage of a very real opportunity to initiate State and local involvement at the earliest stages of planning for a Federal building.

The involvement and support of the local community, as suggested by Miss Hanks, is a basic objective of this bill and it appears that every effort should be made to gain this support at the earliest time, at the beginning of the project.

The Council recommends that the bill be amended to provide that the Administrator has the responsibility to identify buildings of historical, architectural, and cultural significance in a geographical area, and that he be given maximum latitude in working with organizations to accomplish his identification responsibilities.

Within this framework, the Council suggests that it would be appropriate for the Administrator to consult with such organizations as the Department of the Interior, the National Endowment for the Arts, the national trust, the Council on Environmental Quality, and the Advisory Council on developing the means to identify historical, architectural, and cultural properties.

The Council would also like to suggest, as Miss Hanks and you suggested, that further consideration be given to giving the Administrator discretion in leasing space, and not restricting leasing to ground floors only. The use of other areas of buildings, such as rooftops for restaurants, could be regulated administratively rather than by statute.

In this regard, the Council also suggests that the bill allow the Administrator to lease space to Government corporations, and units of State and local governments as appropriate.

Finally, you may have noted that I have consistently used the terms "historical, architectural, or cultural" in referring to the significance of existing buildings.

The term "cultural" might appropriately be added to the present bill. In reviewing Federal projects throughout the country, the Council has found important resources exist which derive their significance more from a cultural association than from architecture or history.

For example, the Beale Street Historic District in Memphis, Tenn., and the Chinatown Historic District in Honolulu, Hawaii, are areas which are most strongly associated with cultural characteristics that have contributed to our heritage, rather than history or architecture.

The Council suggests that, consistent with the National Historic Preservation Act, the bill utilize the term "historical, architectural, or cultural" in referring to the significance of existing buildings.

Thank you for the opportunity to appear before you today. I would like to submit a copy of my remarks for the record which we believe would affect the improvements which I have outlined.

Again, the Advisory Council unanimously supports the proposed bill and looks forward to working with the General Services Administration through this legislation to work toward revitalization of our older urban areas.

Senator BUCKLEY. Thank you. Your proposed amendments will be entered into the record. I thank you. They sound very constructive.

Mrs. SHIPLEY. Thank you.

[The proposed amendments follow:]

Advisory Council  
On Historic Preservation  
1522 K Street N.W. Suite 430  
Washington D.C. 20005

May 19, 1975

Hon. Robert Morgan  
Chairman, Subcommittee  
on Buildings and Grounds  
Committee on Public Works  
United States Senate  
Washington, D. C. 20510

Dear Senator Morgan:

As indicated in my remarks before you today, the Council proposes the following amendments to S.865 for your consideration:

1. The introduction should be amended to read as follows:

"To promote more efficient use of the Nation's construction resources, to foster the preservation of buildings of historical, architectural, or cultural significance, and to enhance the social and economic environment within and surrounding Federal office buildings."

2. Section 2(a)(1) should be amended to read as follows:

"(1) acquire and utilize space in suitable buildings of historical, architectural, or cultural significance, unless use of such space would not prove feasible and prudent compared with available alternatives;"

3. Subsection 2(a)(3) should be amended to read as follows:

"(3) encourage the location of commercial, cultural, educational, and recreational facilities and activities, and of units of government corporations and State and local governments, within or near public buildings;

4. Subsection 2(b) should be amended to read as follows:

"(b) In carrying out his duties under subsection (a) of this section, the Administrator shall consult with Governors, areawide agencies established pursuant to title II of the Demonstration Cities and Metropolitan Development Act of 1966 and title IV of the Intergovernmental Cooperation Act of 1968, the Advisory Council on Historic Preservation, the appropriate State Historic Preservation Officer designated pursuant to the National Historic Preservation Act of 1966, and chief executive officers of those units of local government in each area served by an existing or proposed public building, and shall solicit the comments of such other community leaders and members of the general public as he deems appropriate."

5. Subsection 3(2) should be amended to read as follows:

"(5) whenever a project proposed in the prospectus does not provide for acquisition or purchase of the building or buildings identified to the Administrator pursuant to section 12(c), a statement, including the comments of the Advisory Council on Historic Preservation, documenting and substantiating the economic and other justifications for not acquiring or purchasing such building or buildings; and";

6. Subsection 3(3) should be amended to read as follows:

"(c) Whenever the Administrator undertakes a survey of the public buildings needs of the Federal Government within a geographical area, he shall ~~(contract with the Chairman of the National Trust for Historic Preservation to)~~ identify any existing buildings within such geographical areas which are of historical, architectural, or cultural interest and which would be suitable, whether or not in need of repair, alteration, or addition, for acquisition or purchase to meet the public buildings needs of the Federal Government. In carrying out this identification responsibility, the Administrator shall develop an appropriate identification process, in consultation with the Department of the Interior,

the National Trust on Historic Preservation,  
the National Endowment for the Arts, the  
Council on Environmental Quality and the  
Advisory Council on Historic Preservation."

7. Subsection 4(a)(1) should be amended to read as follows:

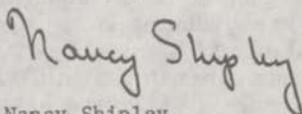
"16) to enter into leases of space (on the ground floor) of any public building with persons, firms, or organizations engaged in commercial, cultural, educational, or recreational activities, or with units of government corporations or State or local governments. The Administrator shall establish a rental rate for such leased space equivalent to the prevailing commercial rate for comparable space devoted to a similar purpose in the vicinity of the public building. Such leases may be negotiated without competitive bids, but shall contain such terms and conditions as the Administrator deems necessary to protect the public interest;"

8. Subsection 5(4) should be amended to read as follows:

"(4) The term "historical, ~~or~~ architectural, or cultural significance" includes, but is not limited to, buildings listed or eligible to be listed on the National Register."

The Advisory Council appreciates the opportunity to comment on S.865.

Sincerely yours,



Nancy Shipley  
Vice Chairman

Senator BUCKLEY. You spoke at the outset, Mrs. Shipley, about the need to take some factors into account other than dollars and cents. I gather your counsel has been at work making such assessments. How has this worked out in practice?

Mrs. SHIPLEY. With a varying degree of success, of course. It is easy to talk about failure more and more. The Federal establishment thinks in terms of the cultural values as leaders as yourself emphasize them. So it filters through to the departments. We find all the time that the historical values are considered more and earlier, which is so important.

Senator BUCKLEY. May I ask this: Have you worked with the GSA in the past?

Mrs. SHIPLEY. Yes; of course.

Senator BUCKLEY. Is the GSA sufficiently imaginative to take these other values into account?

Mrs. SHIPLEY. Yes. Commissioner Sampson has been a champion, as you know, of preservation within his own considerable number of buildings that he has to account for. He does his best. It is not always possible, but more and more. Again, as we like to emphasize, the earlier these things are considered, and this bill would go far in allowing an earlier consideration and requiring an earlier consideration, the earlier it is considered, the easier it is for Commissioner Sampson to take them into account.

Senator BUCKLEY. You are suggesting we provide that kind of latitude to GSA to take these into full account.

Mrs. SHIPLEY. Yes.

Senator BUCKLEY. Miss Hanks, your testimony mentions the task force reports. I wonder if we could have some copies of those.

Miss HANKS. I would be happy to submit them.

[The reports referred to have been retained in the committee files.]

Senator BUCKLEY. It has been suggested there will soon be a number of U.S. post offices that are about to be abandoned. Do any one of you happen to know what opportunities might exist to use these buildings for Federal offices?

Mrs. SHIPLEY. Senator, I think Mr. Garvey, our Executive Director, has been heavily involved in that. Perhaps he could comment for you.

Senator BUCKLEY. Please come forward, Mr. Garvey.

Mr. GARVEY. There are indeed a number of facilities that have formerly been in service as postal facilities, or where the removal of postal services is anticipated.

The Postal Service has the capability to dispose of or sell such property. One of the discouragements, I think, in this kind of transfer or use for office space under these circumstances is embodied in the very difficult financial circumstances that the Postal Service continually faces because of increased costs; and the efforts to secure maximum return on the disposal of, sale, or transfer of such property places a detriment in the way of reuse of postal buildings for other such purposes.

There are a good many situations throughout the country — well, I say a good many. I know of two or three at this very moment—in which the historicity of a postal building is under consideration, or the

reuse of a former postal building is under consideration and the cost factors get to be a very large element in such reuse plans.

Senator BUCKLEY. Thank you.

Are you familiar with the old post office here in Washington?

Mrs. SHIPLEY. There is a bill in the House, H.R. 1501, which has not yet been introduced in the Senate which, I think, would allow the leasing of that post office. It is a specific bill that does for one building what the bill before you would do for every building, basically, I think. It allows an exception to be made for the post office.

Is that right, Miss Hanks?

Miss HANKS. Yes; the old post office, we are quite familiar with it. So is GSA, as you know, sir, and I would be happy to give you a copy of our feasibility study for the use of the old post office on Pennsylvania Avenue.

The situation at the present time, and I think the question might be posed to the General Services Administration, is that they are working out the prospectus on the renovation and adaptive use of that building.

It is a very difficult situation, and I feel rather incompetent to comment on it, but I will. That is, I think the citizens of this community have determined they want to save that old post office building.

Local citizens, government officials, both Federal and from the District of Columbia, made a decision to save the building, and there it sits.

It is being used now by some Federal offices, some District offices. It is an eyesore on Pennsylvania Avenue at the present time. I know the General Services Administration hopes to at least restore the outside, which shouldn't be too difficult, so that it at least looks good from the outside.

A determination will have to be made by the Congress and by the executive as to whether to go forward with the adaptive and multiple use of the building.

The National Council on the Arts has discussed this on many occasions. It feels that the Federal Government, in a cooperative effort of both Congress and the executive, can make a determination that the Government of the United States would be making a statement, and a very strong one, about the importance of a building that was bringing life as well as beauty to downtown Washington.

Senator BUCKLEY. Did you find a great interest among community leaders in this program?

Miss HANKS. Community leaders, there is no question about it. The Pennsylvania Avenue development plan, while it addresses itself to the north side of the avenue, has commented specifically that it believes the old post office on the south side should be preserved.

There are many groups, "Don't Tear It Down," and other groups in the community that are very anxious to have that building made usable by people in that area. I would hope that some day there would be money enough to do it.

Senator BUCKLEY. What about the Willard Hotel?

Miss HANKS. We were asked if we would take an interest in the Willard Hotel. I happen to have a personal interest in the Willard Hotel. When my mother first came to Washington at age 3, she stayed there.

On the other hand, I said to Mr. Lacy and to our associates that if we could work on one building, perhaps that was enough for this year.

Senator BUCKLEY. I hope we can handle more than one at a time.

Miss HANKS. Sir, if you want us to work on the Willard Hotel, we will work on the Willard Hotel.

Senator BUCKLEY. I think it would be helpful for the record if the four of you could give us examples of adaptive-use projects that you believe would set an example or pattern that might be of guidance in carrying out the bill, as well as examples of multiple-use projects.

Miss HANKS. We would be happy to do so.

[The information requested follows:]

## 1. SOME EXAMPLES OF ADAPTIVE-USE PROJECTS

### SALT LAKE CITY, UTAH

The use of thousands of square feet of abandoned trolley barns as an enclosed shopping mall has brought about the reclamation of one of the city's derelict districts. The 67-year-old barns cover a ten-acre block known as Trolley Square. It houses almost 100 commercial tenants, including an open air market, shops, offices, a gas station, and a movie theater, all for an estimated cost of \$7 million.

### BOSTON, MASS.

Under the Massachusetts Housing Finance Agency, the block-long Chickering Piano Factory, built in 1853, was adapted in 1974 to provide 174 units of mixed income housing for artists and craftspeople with studio, gallery, and rehearsal space. By using exposed wood columns, brick walls, and electrical conduits along with other money-saving design features, conversion costs were kept down to \$12.50/square foot—less than half the projected cost of similar new construction.

### CONCORD, N.H.

Based on alternative feasibility studies—one for new construction, one for adaptive reuse—the New Hampshire State legislature decided to adapt Concord's Old Post Office building (1884) for offices for legislators. Scheduled for completion in August, 1975, the adaptation of the French Renaissance structure will cost the State around \$4 million, compared with \$10 million for a new building providing comparable square footage.

### BALTIMORE, MD.

The renovation of Baltimore's Old City Hall, scheduled for completion in the Summer of 1976, is projected to cost around \$30,000 per gross square foot. Comparable city halls built elsewhere recently have cost over twice as much. The adaptation of the 100-year old building will provide 85% more space for offices and ceremonial functions than has been afforded by the building in the past.

## 2. SOME EXAMPLES OF MIXED-USE PROJECTS

### NASHVILLE, TENN.

The first five floors of an \$18 million state office building will house separate music and drama theaters, a multi-purpose rehearsal studio suitable for arena productions, and a state museum. Above will be 10 stories of offices for state agencies. Planners of the building, which is now under construction, were motivated not only by economy, but also by the belief that multiple-use planning would generate nighttime activity in the capitol area.

### WASHINGTON, D.C.

The new Federal Home Loan Bank Board building will have stores on its first floor and mezzanine, providing 39,000 square feet in available public commercial space, and earning \$520,000 per year in rent payments.

## NEW YORK CITY

The Acorn School, a pre-school, was built in "found" space on the ground floor of a New York City high-rise apartment building. The New York Education Construction Fund is planning a 5-story public grade school in an apartment tower on E. 87th St., as well as a commercial high school in a Park Ave. and 34th St. high-rise.

Through special zoning variances for neighborhood needs, developers and the NYC Planning Commission came up with a mixed-use plan involving theaters in new office buildings. The Joseph E. Levine Theatre, the Uris Theatre, and the Paramount are all housed in new office buildings.

City/developer zoning negotiations also provided incentives for the soon-to-be-opened Olympic Towers, 5th Ave. at 57th. Olympic Tower will provide ground-floor commercial, mid-section condominium apartments, and upper-level office space.

Senator BUCKLEY. If you have any examples that come readily to mind, you might want to discuss them now.

Mr. LACY. Senator, the list is very long. I would prefer to submit that for the record, if possible. We have numbers of examples listed in the "Federal Architectural Report" which you asked for copies of earlier. It is replete with examples that range from railroad stations to Federal court buildings to county courthouses.

It would be a simple matter to provide those for you. The San Francisco Mint is one example that GSA is very proud of.

Not all of these are Federal buildings that I am speaking of. They do provide an example of this entire movement of trying to save what is best of this country's architectural heritage.

Senator BUCKLEY. Is it fair to say that a wide variety of structures exist that are soundly built and can be adopted for new Federal offices?

Mr. LACY. Yes, sir, in this town alone, you only have to look at—which is perhaps the easiest example—Union Station, whether or not you agree with the purpose to which it is being put in addition to rail passenger service.

The old Executive Office Building, the Pension Building, the Customhouse in New York City—there are any number of examples around the country. I think it is a very strong movement in this country at the present time.

We hear talk in the architectural profession, maybe wishful thinking, that by the end of the century, we will build an equivalent of another United States. I suppose our interest is in seeing that it won't be at the expense of the first one.

Senator BUCKLEY. Mr. Lacy, as an architect, have you thought of these in terms of energy savings?

Mr. LACY. Yes, we have. We are a little frustrated, I suppose, at the lack of accurate information that would let us assess in a quantifiable way the exact cost savings in energy or dollars.

One of our next projects which we hope to undertake in cooperation with the National Bureau of Standards and other Federal agencies that have construction responsibilities is some way of measuring, so we do have an idea.

Prices fluctuate so quickly in terms of construction it is very difficult to say with assurance that, by reusing an old building, you really accrue great benefits in energy or money.

We believe it is true and we think we have enough figures now that we can make a case for that point of view.

Senator BUCKLEY. Out of curiosity, why is there a lack of information? Have they not been concerned about energy in the past?

Mr. LACY. No; this is a relatively new idea, I believe, which accounts for the lack of information. It is a very new notion, saving old buildings for new purposes. There has always been a certain amount of activity adapting buildings for new purposes. They normally have to be very substantial buildings.

The pressure we experience in this time of progress, and of the higher land costs and greater user expectations is also new.

Senator BUCKLEY. I wonder if Senator Gravel would proceed. I must step out to catch a phone call.

Senator GRAVEL [presiding]. Let me pose one question: What kind of criteria are you going to use for leasing on the ground floor? Obviously that space is more valuable than other space in the building, so you are naturally going into the marketplace. How would you proceed to do this?

Miss HANKS. Senator, I would like to mention a couple. It would seem to me the National Endowment for the Arts would have in mind. Of course, this decision would definitely be up to the General Services Administration. I believe they have procedures that they would follow in that connection.

We would assume that the marketplace would operate in this regard. We would assume that the lower floors would be at a higher cost than the upper floors. We would also assume, Senator, that certain criteria as to the appropriateness of the types of commercial facilities in the building would be considered.

If the purpose in a building were to make it more alive, in other words so it wouldn't be a dead spot in town, it is entirely possible that some commercial enterprises, like banks, as good as they might be, basically open at 9 a.m. and close at 4 p.m., the same as the government, might be restricted in the amount of space they're allowed to lease.

I can also think of other types of commercial enterprises that have some success that would not be appropriate to the dignity of the government building.

Senator GRAVEL. I wouldn't worry so much about the dignity. I think we can add a lot of dignification by allowing multiple use.

Miss HANKS. I do, too. But I was thinking of such things as some of the bookstores.

Senator GRAVEL. I would hope we would not have any adult bookstores.

Miss HANKS. Yes.

Mrs. SHIPLEY. Before we close, I would like to mention the New York Customhouse which, as you know, has been a great example of the Federal Government moving out of a perfectly marvelous building in New York, which is perhaps an example, as Mr. Lacy could testify, of a waste of space, and going into the Board of Trade Center.

This building, I believe, the New York State Historical Commission moved into it. It is being salvaged. But legislation such as S. 865 would require Commissioner Sampson to bring to the attention of the Customs people to try to work it out instead of moving into the great new skyscraper.

Senator BUCKLEY [presiding]. Someone had a lot of space and is trying to fiddle with it.

Miss HANKS. I think the point that the lady makes is very important. Your bill would encourage the Federal Government to be imaginative about adaptive use and multiple use. This is the important thing about it.

At the moment it can be done in some ways by hook and crook, by shifting property to States or local communities. But this would be the Federal Government making a statement about the importance of the adaptive use and reuse of our buildings that are important to our community and making them more useful to all our citizens.

That is again why I think it is the attitude you are proposing that is so important.

Senator BUCKLEY. That, of course, is the objective.

I thank you for your contribution to this hearing.

Before you leave, there is one other problem we would like to ask about. We will have testimony today that mentions possible problems with fire safety and facilities for the handicapped in older buildings. Do you believe these issues can be resolved in most of the buildings that might be adapted?

Miss HANKS. I am absolutely certain they can. In some instances it will be difficult. Buildings with long steps leading up to them make it monumental. On the other hand, the National Endowment for the Arts feels very strongly that engineers and architects can make our buildings accessible to the handicapped.

I might mention, Senator, that the National Council on the Arts felt so strongly about the importance of this some 2 years ago that it passed a resolution about making cultural facilities more accessible to the handicapped, and we have been working very hard on this.

As a matter of fact, among other things, we have programs that provide matching funds for engineering surveys to institutions that have difficulties in this regard.

Second, the council felt that perhaps the endowment was not moving as fast as it might in the total use of cultural activities and accessibility for handicapped people, and therefore they established a council committee, which is chaired by Jamie Wyeth, and the members are Charles Eames and Rosalind Russell.

Mr. Wyeth, who is chairman, felt the subject was so important that he asked his wife, Phyllis Wyeth, to work on this question for 2 or 3 days a week, and she has been with us for the last 2 months and will have a report in, in June.

So it is something we feel strongly about. We feel it can be accommodated. It is a very important part of the legislation.

Senator BUCKLEY. Thank you very much.

Is Mr. James Biddle here?

**STATEMENT OF LAWSON B. KNOTT, JR., EXECUTIVE VICE PRESIDENT OF THE NATIONAL TRUST FOR HISTORIC PRESERVATION, ACCOMPANIED BY JOSEPH MOODY, DIRECTOR, LEGAL AND LEGISLATIVE SERVICES**

Mr. KNOTT. I am Lawson B. Knott, Jr., the executive vice president of the national trust. Mr. Biddle is away and I so informed the committee, I believe, earlier that he would not be able to be here.

I have with me Mr. Joe Moody who is director of our legal and legislative services. We are pleased to be here on behalf of both our chairman and president and the 75,000 members of the national trust, nationwide, which includes some 1,500 member organizations with over 600,000 members.

We feel very pleased to be here to support wholeheartedly this legislation. We so informed Chairman Randolph on March 25 in a response for his request for a report of the bill.

We have filed with the committee a brief statement. I will say that we support each and every provision of the bill, including those that relate to the leasing of space in government buildings for commercial purposes. Also those provisions that relate to the prior examination of the potential of Federal buildings for continued use or for other buildings of national significance before building new buildings.

I would like to comment particularly on that portion which relates directly to the national trust, and to say that our endorsement of section 3 of the bill relates to its fundamental purposes. We would be no less enthusiastic if it should be amended to provide that identification of existing buildings useful as Federal office space should be made by other entities.

Senator BUCKLEY. Mr. Knott, would you approve of the broadening recommended by Mrs. Shipley?

Mr. KNOTT. We would have no objection to that. We believe we are particularly well qualified to do this work objectively for the Federal Government. To do so would be a public service that we would be proud to provide and one which we believe in its broader context was contemplated when the Congress chartered the national trust in 1949.

But our support for the general concept would not be less if the Congress should seek to provide for its accomplishment through other qualified organizations working independently of or in cooperation with national trust.

That, Mr. Chairman, is the sum and substance of our position. I would be happy to respond to any questions or observations.

Senator BUCKLEY. Thank you very much. Your full statement will be incorporated into the record [see p. 37].

I would like to ask you, do you currently have the staff that would enable you to undertake the kind of responsibility cited in section 3?

Mr. KNOTT. No; indeed, Mr. Chairman. We do not have that staff. The national trust, essentially, in its early days, did acquire some museum properties which it operates and continues on a selective basis to acquire museum properties, such as Lyndhurst in your State.

Today, the national trust is placing great emphasis on its catalytic role, assisting local organizations and entities where the grassroots strength of the preservation movement lies.

We are aiding those organizations in moving forward, and in so doing, we have operated for several years a consultant grant program in which small amounts of money—\$500, \$1,000, \$5,000—have been made available to local groups to employ architects and other specialists in their historic district program.

In this and other programs, we have created over a period of years a great reservoir of constant manpower and expertise that we know

is available and could be brought to bear nationwide in a program of this type.

So while we do not maintain a large staff we are a strong organization, and have headquarters staff of some 120 people and another 150 nationwide.

We are expanding, however, I might add. We have three regional offices, beginning first on the west coast, 5 years ago, then Chicago, then in New England. We expect two more in the South and Southwest this year. So our staff outreach in the local areas is gaining strength.

Senator BUCKLEY. Therefore, you would be able to do the job.

Mr. KNOTT. We think we could handle the job.

Senator BUCKLEY. Do you agree on the desirability of broadening the definition to include cultural as well as historical and architectural important buildings?

Mr. KNOTT. Yes.

Senator BUCKLEY. Have you participated in any programs that have involved multiple use or adaptive use? Do you have any direct experience along these lines?

Mr. KNOTT. Here again, Mr. Chairman, in a catalytic role. We are now working with a project that because of the long struggle and the persistence of the local people in St. Louis, and with the aid of the General Services Administration, has gained a certain amount of notoriety nationwide. For more than 10 years, local interests have been attempting to save the old post office building; and to provide for multiple uses of this old building which was designed by the same architect who designed the old Executive Office Building here in Washington. It is a very distinctive building.

We have recently come to the aid of the local people by providing for a grant of \$15,000 to help them update their cost data so they can provide the kind of information that private lenders require in order to help finance the project.

In other words, quite often we are able to come in at a time when local interests have exhausted their resources, and we have been able to help them move forward.

We performed such a role in the Wainwright Building in St. Louis, and the Willard Hotel in Washington. And the Prudential Building in Buffalo, we hope to do the same thing.

This is an indirect answer. But through our work with local organizations and consultants, we have experienced the joy and pride they feel in providing for adaptive uses that have been made of some of the old buildings.

Senator BUCKLEY. You are satisfied about the feasibility of the concept?

Mr. KNOTT. Yes; indeed.

Senator BUCKLEY. And the projects with which you have been associated met fire hazards and security standards?

Mr. KNOTT. Yes. You would be interested to know that we feel that the case histories that are developing in the field of preservation, both private enterprise and, since the 1966 Historic Preservation Act, with the aid of the Federal Government, are very important from an economic point of view—that we are bringing together a group with the

cosponsorship of the Urban Land Institute, the American Institute of Architects, and several other organizations who are directly involved in the development of properties.

We are bringing them together in late July in Seattle. Mayor Ullman of Seattle, working with private enterprise, has been able to do a great deal in pioneering the way for saving worthwhile buildings.

It is fortuitous that I used the word "pioneer" because it is Pioneer Square in Seattle that is such an example of adaptive use that has been made, with the major and with local lending institutions working together.

So we have a conference scheduled and we will have publicity out on it a few days. We expect 300 or 400 people around the country to come to Seattle to discuss not only success stories, but some examples of failures and why did they fail.

In other words, we hope for a clinical analysis of some very outstanding examples of preservation by private enterprise and by the public sector, too.

Senator BUCKLEY. Thank you. That should be a very interesting conference. I am sure it will prove tremendously helpful to the Government. Thank you very much.

Mr. KNOTT. Thank you.

[Mr. Knott's statement follows:]

STATEMENT OF NATIONAL TRUST FOR HISTORIC PRESERVATION  
IN SUPPORT OF S. 865 BEFORE THE SUBCOMMITTEE ON BUILD-  
INGS AND GROUNDS, COMMITTEE ON PUBLIC WORKS, UNITED  
STATES SENATE

MAY 19, 1975

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Mr. Chairman and members of the Subcommittee, my name is Lawson B. Knott, Jr. I am the Executive Vice President of the National Trust for Historic Preservation.

Created by act of Congress in 1949, the National Trust is responsible, among other specific things, for fostering public participation in historic preservation.

In behalf of our Board of Trustees, our officers, and our more than 74,000 members throughout the United States, I wish to express my appreciation for this opportunity to appear in support of the purposes and objectives of S. 865.

We believe that the Congressional mandate to the Administrator of General Services set forth in Section 2 of the bill provides needed legislative policy direction to assure accomplishment of the Congressional intent as to the purposes of the bill.

The National Trust endorses the amendments which would be made, by Section 4 of the bill, to Section 210 of the Federal Property and Administrative Services Act of 1949, as amended. Consistent with the recent staff report of the Federal

Architecture Task Force established by the National Endowment for the Arts, these amendments would provide for the commercial, cultural, educational or recreational uses of the ground floor space in Federal office buildings where such uses will not disrupt the operation of the buildings. The many benefits flowing from the implementation of such a "good neighbor" policy by the Federal government are amply demonstrated by the experience of Canada and at the state and local levels of government in this country, as explained in the Task Force report and by Senators Buckley and Baker upon introduction of the bill.

However, our more direct concern with the bill relates to the amendments which would be made to the Public Buildings Act of 1959, as amended, by Section 3 of the bill. Under this Section, the Administrator of General Services, when undertaking a survey of public building needs within a geographic area, would be required to contract with the National Trust in order to identify existing buildings within such areas, including, but not limited to, those of architectural or historical interest suitable, whether or not in need of repair, alteration, or addition, for acquisition, to meet the public buildings needs of the Federal government. In addition, where such buildings are identified, but a public building project proposed by the Administrator of General Services does not propose their acquisition, the prospectus

must include a statement of the economic and other justifications for not acquiring such buildings.

Senator Buckley said, in introducing the bill, that it would encourage the renovation and recycling of existing buildings for Federal office use, where appropriate, and that recycling what is worthy and well built in our architectural heritage, for use as Federal office space would produce many benefits. We certainly subscribe to those views. As the Senator also pointed out, recapturing some of the beauty of the past would make our cities more livable by fostering continuity and progress. By participating in Federal space need surveys in the manner provided by Section 3(3) of the bill, the National Trust should be able to identify many historic office and other buildings of the kind mentioned by Senator Buckley. Conversion of the interior of such buildings to meet current Federal space needs accompanied by restoration and preservation of their exteriors, should provide viable and economic alternatives to new construction.

While we have not made a study of the labor-intensity relationship between new construction and renovation and restoration, it is our information and belief that restoration and renovation work produces considerably more jobs per dollar expended than new construction.

Conversion, restoration and preservation of buildings, in addition to providing needed job opportunities, would salvage the energy initially expended in constructing the structures and, at the same time, conserve energy resources which might otherwise be dissipated in their demolition. The conservation of energy resources which would result from recycling the worthy elements of our man-made environment would, we believe, be significant.

We believe, further, that Federal leadership in a program of utilizing recycled historic structures for its own space needs, also would significantly stimulate state and local governments to pursue the same course of action in providing for their office space needs.

National Trust historic preservation activities are funded in part by Federal grants-in-aid provided by the National Park Service, Department of the Interior, on a 50-50 matching fund basis. The Trust's matching share is provided by membership fees and private donations of money or other property.

New subsection (c), which would be added to Section 7 of the Public Buildings Act by Section 3(3) of S. 865, is understood by us to intend that National Trust costs incurred in identifying structures suitable for government use would be reimbursable under the terms of the contracts to be entered into with the General Services Administration and, thus,

would not constitute a drain on other funding available to the National Trust which has never been adequate to carry out all worthy preservation opportunities. I wish to emphasize that our general endorsement of Section 3 of the bill goes to its fundamental purposes and would be no less enthusiastic if it should be amended to provide that identification of existing buildings useful as Federal office space was to be made by other entities. We believe that we are particularly well qualified to do this work objectively for the Federal government and to do so would be a public service that we would be proud to provide. But our support for the general concept would not be dampened if the Congress should see fit to provide for its accomplishment through other qualified entities working independently of or in cooperation with National Trust.

There appear to be minor technical deficiencies in the bill which we have called to the attention of the Committee in our report of March 25, 1975, to Public Works Committee Chairman Randolph.

We urge Subcommittee approval and Congressional enactment of the measure which undoubtedly would favorably impact the preservation of buildings significant to American history and culture throughout the Nation.

Senator BUCKLEY. We will now call up the architectural panel: Mr. Robert Burley of the American Institute of Architects; Mr. Peter Lawrence, program coordinator, Harvard Graduate School of Design; Mr. Anthony Newman, executive director, New York Landmarks Conservancy; Mr. Jonathan Barnett, director, Urban Design, City University of New York; and Mr. Frederic P. Wiedersum, Frederic P. Wiedersum Associates, New York.

We seem to have, by some odd coincidence, a number of witnesses from New York.

Before you begin your presentations, I would note that I wrote to a number of architects, planners, local officials, and other, asking them to comment on S. 865. We received a number of answers, all of them positive. I would like to take this opportunity to place them in the record.

[The material referred to may be found in the appendix, p. 113.]

Senator BUCKLEY. Shall we start with Mr. Burley?

Gentlemen, you may either read your statement or put it in the record and comment on it informally. It is up to you. In any event, they will be incorporated in full in the record.

**STATEMENTS OF ROBERT BURLEY, THE AMERICAN INSTITUTE OF ARCHITECTS; PETER LAWRENCE, PROGRAM COORDINATOR, HARVARD GRADUATE SCHOOL OF DESIGN; ANTHONY NEWMAN, EXECUTIVE DIRECTOR, NEW YORK LANDMARKS CONSERVANCY; JONATHAN BARNETT, DIRECTOR, URBAN DESIGN, CITY UNIVERSITY OF NEW YORK; AND, FREDERIC P. WIEDERSUM, FREDERIC P. WIEDERSUM ASSOCIATES, NEW YORK**

Mr. BURLEY. I am representing the American Institute of Architects. We do have a written statement which I would like to submit for the record. You will find that our testimony does in fact support the bill very strongly. I will not read our testimony but instead I have a series of slides which show actual case histories involving adaptive use and multiple public use of Government buildings. I would like to present the slides rather than going through our detailed statement.

Senator BUCKLEY. Excellent.

[The statement appears at p. 57.]

Mr. BURLEY. As you know, the Federal Government is not new to the area of historic preservation. We have already had mention of the Pioneer Courthouse in Portland, Oreg., which is a current example of Federal adaptive use. Also, the old U.S. Mint Building in San Francisco.

But in earlier years the Federal Government worked on adaptive-use projects in Philadelphia and on a courthouse in St. Louis and other places around the country. Adaptive use is not a new experience for the Federal Government.

Multiple use within buildings is also not new. In 1939 Rockefeller Center was built in New York City, a classic example of office space on the upper floors and then public use at the lower or ground level, shops and restaurants, ice skating, theater, the kind of public activity which complements office use above. This was 1939.

But it seems that since that time, particularly after the war, we tore down large portions of our cities' existing structures. We discarded architecture and art which we didn't think were so attractive at the time, and we built sometimes in their place tremendously monotonous projects.

In many cases these were pure housing or pure shopping projects. We seemed to forget the multiple use concept. This slide shows foreign example and I won't tell where it is in the interest of foreign relations. But it shows you how dull some recent projects can be.

In the seventies there seems to be a resurgence of interest, not just in historic preservation but in adaptive use of buildings. We would like to keep a building like this, which you are certainly not going to build again. You have to find a good use for it so you can support it economically.

In this case it is the Jefferson Market Courthouse in New York City. It was adapted for use as a library. Cleaning up the brick work, carpeting the floors, adding good lighting, and moving the library equipment inside created an adaptive use that was very reasonable in cost.

Probably the best known adaptive-use project which started in the late sixties is Ghiradelli Square in San Francisco, where manufacturing and factory buildings were turned into shops and other uses.

The construction costs were probably \$30 per square foot. Certainly you could build retail space for the same price per square foot. I wouldn't say there was a great cost saving in these buildings. But in Ghiradelli Square, the excitement and space is something which could never be duplicated at a comparable cost per square foot.

I think a higher quality, in fact, has been achieved here by utilizing existing architectural resources.

Next is the Cannery, also in San Francisco, another warehouse, commercial building converted to office space, shops, and providing for human uses.

Introducing good fire stairs, opening the buildings up, and multiple use are evident in this case. It makes a very pleasant kind of human environment.

Another very good example in San Francisco is the Showplace. This is an existing warehouse building. It is the kind of a building that only a mother could love, I guess, when you look at the outside.

You might ask why more people don't adapt these kinds of buildings if it is economical?

If you look at the Showplace before it was converted, it is a very discouraging kind of space.

Yet, on examination of the structure, it is sound; it supports 100 to 200 pounds per square foot. It has a sprinkler system in place. An architecture, planning, and engineering team with imagination took this kind of space, sandblasted the existing structure, cleaned up the brickwork and columns, and introduced good lighting, carpeting, and made it into a very exciting center for furnishings and other uses.

This is adaptive use at a very low cost. I would guess between one-third and one-half the cost of a new building providing comparable facilities.

In Vermont, I can speak from very close experience because this is my own office building, purchased 10 years ago for \$8,500. We did

\$15,000 worth of improvements. Everyone in Vermont thought we were crazy. We ended up with 3,000 square feet at \$6.67 cost per square foot, one-half or one-third of what the cost would be—

Senator BUCKLEY. Is it fireproof?

Mr. BURLEY. It is not fireproof. It does not have a sprinkler system. It is very close to a trout stream so we can push it in.

But the space inside is very comfortable. We have had clients in from New York and Boston. They would rather do business here than in a new commercial office building.

Also in Vermont we did a master plan for the State of Vermont. We recommended that the State purchase the building that you see on the right, which is the old Pavilion Hotel, built in 1875.

After a feasibility study, everyone thought it was a white elephant. We recommended they develop it into a museum. We showed how it could be preserved and the landscape improved around it; an auditorium for public use.

The building was actually rebuilt entirely, but it was done at a cost of \$27 a square foot at a time when totally new building construction cost between \$30 and \$35 a square foot.

I think in this project and other projects that the saving is usually in the area between 20 to 30 percent over new construction. In some of the cases I showed, it went as high as a 60- or 70-percent savings. I think, more realistically, it is between a 10- and 30-percent savings.

This State office building in Vermont has a veranda on it. It has rocking chairs outside. State employees eat lunch there. I think it is the only State office building in the country with a veranda.

Also, in Montpelier, this slide illustrates an old apartment block with stores which used to be on the lower floor that are poorly painted and poorly maintained. The owners wanted to tear this down and put in its place a two-story office building, at a cost of between \$150,000 and \$200,000.

But the facade was cleaned up, sandblasted, the cast iron parts exposed, the right paint colors applied. The cost for adaptive preservation work was about \$80,000, certainly less than half the cost of putting a smaller new building in its place.

The space on the ground floor was air-conditioned. The basement space was utilized. It had never before been used. It gave the owners offices for an insurance company with very economical space.

One more example in Vermont, and that is the Windsor House, an old home. With the help of HUD funds, a matching grant of \$92,000, this building was purchased by Historic Windsor, turned over to the city of Windsor, drawings were done of how the buildings originally looked, with a supermarket, chimney, shutters, and everything else, and a second sketch which showed what it could be when it was restored.

In fact, the restoration has been completed. The building looks, if anything, better than the sketches did, and the cost, with elevators in place and first-class office space inside, will be about \$25 or \$26 per square foot. Again, definitely less than the cost of new construction.

The State bicentennial office is in this building now, and there is also a restaurant on the lower floor. So it is both adaptive and multiple public use, really, within the building.

The number of projects of this type is increasing in the private sector across the country. This is Brookfield Community College. It is a barn which was converted into a library.

This is a department store in Dallas, Tex., adapted for use as El Centro Junior College. It makes a very handsome building.

Salt Lake City: some trolley barns. Again, this is the kind of space that, when someone first looks at it, he wonders what in the heck anyone could do with it; who could ever like it?

Yet, when you see this project in its completed form, again, it is very exciting. It has dozens of human uses inside. It is very good use of an existing structure. It certainly performs a function for the people in Salt Lake City.

The Bradbury Office Building in Los Angeles, returned to office use and shops on the lower levels.

The Wainwright Building, which has been mentioned, in St. Louis, Mo., currently being restored for State office use. Again, the basic concept is shops.

In Albany, N.Y., the old Delaware & Hudson Railroad Co. building now being adapted for the use of the State university computer center and other office centers.

Here in Washington, D.C., the Canal Square project just off M Street. This is a combination of restoring existing buildings and combining them with new office structures and shops. Basically, it does have offices on the upper floors, shops, restaurants, and public activities on the lower levels. But it has a very good human scale, well executed in this case.

Of course, in Europe the idea of adaptive-use preservation has gone on for generations and centuries. In Amsterdam, where 90 percent of the central business district is on the National Historic Register, so to speak, it becomes perhaps a bit of a problem.

Yet, in Europe you see excellent examples of new buildings, old buildings, side by side, and it usually maintains exciting public interest. These are real live communities that we see in Europe.

In the United States, the trend is also strongly in this direction.

This is Fountain Square in Cincinnati, Ohio. Fountain Square has a series of pedestrian walkways above the street level, so you have a separation of pedestrian traffic and automobiles.

Crown Center in Kansas City, a new building project for multiple use.

I think at this time there is a new excitement coming into architecture in cities in the United States. It is a form of rediscovery. You can see it in the public spaces. They are much more human, much more interesting.

This has even gone as far as Federal Post Office signs. This is the most adventurous one.

Senator BUCKLEY. Where is that?

Mr. BURLEY. I don't know where it is; unless it is in Trolley Square, I would guess, in Salt Lake City. We have a number of experts here and I think they could probably identify where the sign is.

But we have accomplished some very handsome Federal buildings. This is a Federal Reserve Bank in Michigan. But in this case there is no public use at the ground level. We have restored, very economically, existing buildings to new uses, as in the case of the Showplace.

We have achieved exciting public spaces in new buildings. I think it is very logical to combine adaptive use of new Federal buildings, public use of new human scales, and blend them together.

We, at the American Institute of Architects, would like to see the Federal Government demonstrate the potential of this process. Thank you, Senator Buckley.

Senator BUCKLEY. Thank you, Mr. Burley. That was extremely interesting.

Mr. Lawrence?

**STATEMENT OF PETER G. LAWRENCE, PROGRAM DIRECTOR,  
NEW LIFE FOR OLD BUILDINGS**

Mr. LAWRENCE. Senator, I am Peter Lawrence, program director for new life for old buildings at the Harvard Graduate School of Design. I would like to ask that my testimony be entered into the record, and I would like to offer a few remarks.

Senator BUCKLEY. Your statement will, of course, be printed in full. (See p. 84.)

Mr. LAWRENCE. It is a privilege for me to be here in support of S. 865. I strongly endorse the purposes and intent of this bill.

I also think there is very broad-based support for the intent of this legislation. My primary interest is the encouragement of conservation and the effective use of the manmade environment.

I think that the purposes of the legislation very strongly address this.

There are two points here. The intent of the legislation is to promote more efficient use of the Nation's construction resources, within a broad context that is not limited to the preservation of few landmark buildings.

The other is to foster the preservation of buildings of historic or architectural significance. The point here is that buildings of significance should be given the first consideration, but then very active consideration should be given to other existing buildings, such as those which would not fall in the assigned category.

One of my recommendations would be to strengthen the legislation to insure that this process would be followed—that is, that other existing buildings would be considered after first reviewing architecturally significant buildings.

Senator BUCKLEY. Would the word "cultural" be broad enough or not?

Mr. LAWRENCE. Senator, rather than attempt to do it that way, the way I approached it was to break it into two sections. After consideration of what was deemed to be historically, architecturally, and culturally significant buildings, perhaps an addition could be made for a consideration of other existing buildings in the area that would prove prudent and feasible to pursue as office space.

I would like to discuss two examples in more detail, in terms of the economics. One is the Winthrop Square Building, the old Record American Building in Boston, which, I believe, provides an example of the economic viability of mixed use in a recycled structure.

This building has been converted into office space with about 10 percent of the total floorspace being commercial on the ground floor.

The total cost for this work is \$40 a square foot, including acquisition cost. The cost of new construction on that site during the same period of time would range from about \$70 to \$80 a square foot.

One of the advantages of the recycling process that is pointed out in this project is when the building was completed, it was already 20 percent rented. Today, it is 60 percent occupied and 90 percent rented.

I think this rapid rent-up process provides an additional advantage in the recycling process that often does not exist in new construction. By being able to renovate a small portion of the building, one can show a potential client that he will be able to rent earlier in the process.

Another example is the proposed renovation of Union Station in New London, Conn., a National Register property. This will be renovated into 22,000 square feet of space and will retain its function as an Amtrak Station, giving Amtrak 5,000 square feet, at a total renovation cost of \$28 per square foot.

The alternate proposal that was considered for the site of the station would have produced a 5,000-square-foot building at a rather high cost of \$100 per square foot. This would have given Amtrak less space for a higher rent. Amtrak would have gotten 3,000 square feet. The rent would have been higher because they would have been supporting a larger percentage of the total space of the building.

So with this station you have an example of mixed use—a restaurant, railroad station, two floors of office space, and a much higher quality space for a lower cost. You also have more space for Amtrak at a lower rent.

I would also like to comment that I think there is extremely broad-based support for the conservation and reuse of buildings. I think that there is a large group of people that view the conservation of buildings as conserving valuable resources of energy, time, capital, and craftsmanship. Such people consider the destruction of any building to be a waste.

I found through the program new life for old buildings and several other programs I am currently doing at the School of Design that there is this support. New life for old buildings is attended by approximately 200 city and town planners, architects, and contractors every Tuesday evening for about 3 to 3½ hours.

This is a series that normally, as a continuing education program, might draw 40 people. Another indicator of the increasing interest is at the Rhode Island School of Design where the graduating class of architecture students select the projects on which they work during the final 5 months of their program.

This would be a project they are particularly interested in pursuing. This year, 75 percent of the graduating students chose the preservation and/or reuse of existing buildings. Last year I think that percentage was probably around 10.

I would like to briefly comment on a couple of my proposals. I think, as I have said, in order to reflect more strongly the intent of going beyond the issue of historically significant buildings, I recommended, with regard to section 12(c) of the Public Building Act, that this be addressed as two areas so that the significant buildings were considered first and all others were then considered. I also would like to recommend, as others have, that the mixed-use concept possibly be broadened to include space beyond the ground floor of the building.

To accomplish this, perhaps an amount of space equivalent to the ground floor area could be considered and, thus, allow one to go vertically and use other floors. I think the security problem could be covered in doing this.

I would like to thank you very much for giving me the opportunity to comment on the bill and offer you these suggestions.

Senator BUCKLEY. Thank you, Mr. Lawrence.

I shall address some questions to the panel as a whole after we complete the individual presentations, as I would like to follow up on several of the matters you touched upon.

Our next witness is Mr. Newman.

#### STATEMENT OF ANTHONY J. NEWMAN, EXECUTIVE DIRECTOR, NEW YORK LANDMARKS CONSERVANCY

Mr. NEWMAN. Thank you, Mr. Chairman. My name is Anthony J. Newman. I am executive director of the New York Landmarks Conservancy, which is working for preservation and reuse of significant architectural, historical, and cultural buildings in New York City.

The bill currently under consideration, S. 865, is in many ways a model response to the challenges entailed by the need to integrate important examples of our architectural heritage into the life of today's communities.

It presents an opportunity for the Federal Government to share in, and to give leadership to, the growing movement to recycle structures which are of great importance to the communities in which they are located.

There is increasing evidence that this recycling makes sense, not only esthetically and environmentally, but also economically. That is to say, we can conserve and reuse architecturally significant buildings, make the most judicious use of dwindling resources and energy supplies, and obtain attractive and functional space at costs which are generally significantly lower than the costs of demolition and new construction.

Without the consideration of site acquisition, which would apply in either the case of rehabilitation or new construction, the cost of constructing new office space in New York City will average \$50 a square foot.

Broadly speaking, in the same market, assuming basic structural soundness, the cost per square foot of rehabilitated office space can be as low as \$30 per square foot, a difference of up to 40 percent.

Some reasons are immediately evident. In rehabilitation work one is usually dealing with existing foundations, exterior walls, and roof. It must be remembered, though, that the rehabilitation of well-chosen buildings will preserve, for the general benefit, priceless and irreplaceable examples of workmanship and character that are often contained in buildings that the Government would be concerned with under the terms of this bill.

The cost of rehabilitation will naturally vary according to the complexity of the building that is under consideration. But the cost can vary in either direction. It can be a high cost, as some of the examples shown this morning demonstrated, or they can also be low costs.

The May issue of *Fortune* had an article on the Butler Square in Minneapolis, a workhouse structure that was converted to mixed uses.

Office use was a significant part of the new life for the building. The building is being completed at the cost of \$20 per square foot. I think it is remarkably low in today's world.

A particularly commendable aspect of the bill is its recognition of the very strong advantages to be realized from making federally controlled space available for commercial, cultural, educational, and recreational uses.

Not only would government facilities become good and lively neighbors, but the inclusion of such activities could, indeed, be a determining factor in the viability of the Government's acquisition and operation of a particular building.

In many cases, older buildings have within them ground floorspaces which are of outstanding character but do not lend themselves readily to office functions. They would be appropriate, however, for uses such as shops, performing arts, groups libraries, and other revenue-generating activities that could indeed enhance the viability of Federal operation of the building.

A further consideration that I think ought to be included in the ultimate form of the bill is the fact that many of the buildings that will come into consideration under the terms of the bill will be buildings in heavily developed downtown areas of the cities. A lot of these older buildings will have unused development rights.

This will be a great asset for the Federal Government in acquiring any such buildings and will represent an important tool for influencing the future development of such downtown areas.

Senator BUCKLEY. Could you explain to me, in a layman's term, what that means?

Mr. NEWMAN. Yes. If the building which is chosen for its architectural, cultural, or historical merit is 10 stories tall in an area that is generally characterized by buildings of 35 to 40 stories, very simply speaking, there are 25 unbuilt floors on that site.

The right to build those floors does belong to the owner of the site. In a plan put forward by John Costonis, in a work entitled "Space Adrift," it was proposed those development rights be detached from the site once it is determined the building is worth preserving and be made available to other areas of the city in a controlled fashion so that the preservation of the building from which the development rights have been removed is fairly certainly assured and the development rights can be applied in other areas where the local jurisdiction has decided that they will not compromise or destroy the character of the other area.

It is a concept which is rather recent and which has been applied in New York City and, to some extent, in other areas. The most outstanding example of its application in New York City is the South Street Seaport Museum, and, separately, the New York City Landmarks Preservation Law allows the limited transfer of development rights from a designated landmark building to an adjoining site.

I would suggest that under the bill being considered great consideration be given to the implications of such unused development rights that may accrue to the Government in its acquisition of significant properties, and that the Government, with local jurisdictions, work out imaginative and effective ways of dealing with those development rights that will enhance the future of the city in question.

I thank you for this opportunity to comment on your bill. On behalf of the directors of the New York Landmarks Conservancy, I state our strong support for the bill and congratulate you for the foresight which is evident in its concept and language.

Senator BUCKLEY. Thank you very much.

Mr. Barnett, we have your handiwork here.

**STATEMENT OF JONATHAN BARNETT, DIRECTOR, GRADUATE PROGRAM IN URBAN DESIGN, THE CITY COLLEGE OF NEW YORK**

Mr. BARNETT. I appreciate the opportunity to come here and testify on S. 865, the Public Buildings Cooperative Use Act of 1975. I am going to emulate my colleagues and ask that the full text of the statement I have prepared for you be made a part of the record. I will confine myself to a few comments drawn from that. (See p. 69.)

I do think this is a sensible piece of legislation. I think it would work. It represents another very useful opportunity for administrators to work in a flexible way with complete urban problems.

I agree with you, Senator Buckley, when you said in your introductory statement that you didn't see this bill as miracle working. I think that statement reflects a very just appreciation of the nature of urban problems.

There is no one solution that anyone is going to propose that is going to work seemingly miraculous results. This bill is clearly a useful step and is something that will be helpful.

To my mind, it is most useful because it promotes two characteristics of the city which are best described by the words "complexity" and "continuity."

Complexity is the essence of what cities have to offer, a lot of things going on in small spaces. When you introduce a single-use building into a complex fabric, you are probably diminishing both its strength and its life.

Also, we have learned from experience, particularly through urban renewal, that cities are complex, living organisms. If you go into a city and remove large portions of its physical structure, you cause a shock to the economic and social structure of the city.

Continuity is the other general characteristic. The effect of this legislation is to promote continuity of activity between old and new parts of the city.

This bill's great strength is that it represents a tool to Federal and local administrators. It will, however, require administrative imagination. I don't know how you write the need to exercise imagination into a bill, and of course, there are always impediments to new procedures.

I would like to talk about two particular categories of buildings. One of them is old post offices. When you look at the old buildings which ought to be reused, many of them have turned out to be Federal buildings in the first place.

The Postal Service, because it is phasing out central post offices in favor of warehouse structures on the outskirts of cities, is going to have a lot of surplus buildings of high architectural quality.

Just as an example, the Central Post Office in Buffalo or the postal warehouse in Greenwich Village or to cite another kind of Federal Building, the customhouse in New York City. I am not sure whether

you should do it through this legislation or not, but you should perhaps consider adding language to this bill which would ask the Federal Administrator to give priority to Federal buildings of high architectural quality which are in the process of being phased out of their present Federal use.

The other point I wanted to make is about new Federal buildings. I think that the office building as an architectural form is not necessarily the correct shape for a lot of Federal services because many Federal offices require a degree of public use, people using the building, which is much greater than you would experience in a normal office building.

As a consequence, I think this bill should encourage the architect as well as the Administrator to rethink the whole nature of the space in which Federal offices are located.

If you just think of the result of this bill as, perhaps, a supermarket at the ground floor of a conventional Federal building, I think it would not be appropriate.

If you look upon Government services as something offered in a very accessible setting, perhaps a shopping mall, in which some of the other less accessible offices may be off to the side, you may be talking about a very new and useful sort of building.

I think a commendable effect of this bill will be the opportunity for the professional to rethink the whole nature of what Federal space should be. I hope it is used that way.

I am making a copy of my book, *Urban Design as Public Policy*, available to you. I am not asking you to make the entire book a part of the record. Perhaps your staff might want to look at the third chapter which deals with the transfer question that Mr. Newman pointed out, and also chapter two on *Designing Cities Without Designing Buildings*, which talks about mixed use.

I would like to comment on a couple of queries you made this morning. On the question of competitive bids, you may not be able to substitute a new procedure for competitive bids, but it might be possible to add other administrative criteria besides cost: Strategic location, quality of the building, the value of the space itself. Such criteria can be put down on paper, they can be used administratively.

The question of energy saving, old buildings were designed when energy was not as available as it is today. If you use the old building in the way it is originally designed, if you close the interior doors in the winter, use the high ceilings and open the doors in the summer, it is possible to say that old buildings are more environmentally sensible, and make better use of energy. It is conceivable that an old building would be energy saving just by virtue of its original design.

I appreciate the opportunity to speak to this bill. I commend it. I am very happy to see it was introduced. I hope it goes forward.

Senator BUCKLEY. Thank you, Mr. Barnett.

Mr. Wiedersum.

#### STATEMENT OF FREDERIC G. WIEDERSUM, WIEDERSUM ASSOCIATES

Mr. WIEDERSUM. Thank you, Mr. Chairman. I have submitted my report for the record and I would likewise, with everybody else, like to make just a few comments. (See p. 74.)

We are definitely in favor of the bill. We feel that historical and architectural significant buildings are worthy of the effort for architectural engineering studies to determine their future usefulness as Federal buildings.

I would like to make a statement that I do not believe that all buildings studied are going to prove to be useful buildings. I do not believe that every building study is going to result into lower construction cost. But I do feel it is very important to the architectural and engineering profession to be given the opportunity to make these feasibility studies. The professionals should study the space utilization of the building, make a structural analysis, mechanical and electrical studies of existing systems.

Many of the mechanical systems may prove to be obsolete and may have to be completely removed or rejuvenated. However, if these studies prove that the ultimate savings in total dollars spent for renovation rather than new construction, and there are these savings, then a decision for preservation should prevail.

Every effort should be made to recycle existing structures through these detailed value and life cycle analyses by the professionals.

Private investors have found it prudent to renovate existing structures rather than to demolish them. We have demonstrated in hospital design the economic advantages of reconstructing existing facilities.

Municipalities have embarked on restoration projects which have proven to be successful. Some of them have been mentioned already today. The Board of Trade building in Chicago is an example.

Jefferson Market Courthouse in New York City, which was mentioned, was converted into a public library. Fort Schuyler in the Bronx was converted into a maritime center.

I support the concept of providing commercial, cultural, educational, and recreational facilities in Federal buildings for the following reasons: The facility can become revenue-producing for the municipality. The buildings, through use, should generate an awareness of the value of our Federal office buildings and therefore encourage the facility to become a focal point of that community's activities.

This concept has certainly been successful and completed by private investors. Shopping centers have been related to office buildings. This has been done over and over again, not only in new buildings but in renovated buildings.

And the concept which GSA has now embarked on a program of lease-back, whereby Federal agencies are leasing back from private investors space, I believe the inclusion of commercial establishments on the first or second or whatever floors will encourage the private investor to go into a lease-back situation with the Federal Government.

In closing, I would like to compliment the committee on introducing this bill which I feel has such a significance on our architectural heritage.

Thank you.

Senator BUCKLEY. I would like to direct this question to the panel as a whole. Please answer as you wish. My question is about the limitation in the bill on the right to lease only on the bottom floor, the first floor. It has been suggested that perhaps leasing should be ex-

tended to the mezzanine or to the top floor. One witness suggested that the equivalent of the first floor space be rentable at the discretion of the GSA.

Do any of you care to comment on the need for greater flexibility? If so, what sort of standards should be applied to prevent GSA going into competition with the commercial office buildings?

Mr. BURLEY. I feel you should be in a position where you can lease space along what I would call a principal pedestrian-way. Whether this occurs at the street level or basement level, or perhaps a level above the street, that would be the essential criteria.

If the space can also go through more than one layer vertically it permits a better, more functional flow of people through the space. If it is accompanied by this kind of lease space, I think it will encourage this use.

Mr. NEWMAN. I think there is another consideration which may go into arguments on behalf of spaces of the buildings being made available on other than ground floors.

The bill mentions making space available for commercial, cultural, educational, and recreational facilities. Many of the organizations who would use space under those rubrics would be not-for-profit organizations who depend on a great many other sources for their income and operating expenses.

Ground floor space is usually the most desirable and is generally the most expensive. If the organizations who would benefit from this provision in the bill could use other spaces in the buildings which would be rentable to them at less than the high rates for the ground floor, I think that would be a very beneficial aspect of the bill.

The criteria for determining which organizations should perhaps benefit from such less-expensive-than-ground floorspaces could be worked out by the national endowment, by State councils, or other associations which are familiar with budgets and arts and civic groups.

Senator BUCKLEY. Should space be made available to such groups at less than commercial costs?

Mr. NEWMAN. If that is at all possible, I think that would be desirable. The offset could perhaps be found in higher rents generated by other spaces in the building.

Mr. LAWRENCE. Senator, I think, to continue with this issue of space being adjacent to major pedestrian access, this actually enables one to charge higher rents because this is the area where the commercial activities would most prefer to be located. In turn, this would compensate for the nominal rents charged for the other spaces.

But it would be in the best interests of the administrator to be renting rather than locked into the ground floor, to be able to rent where the traffic is and therefore charge the rents.

Senator BUCKLEY. Do you see any problems with the operators of private buildings who might see the Government competing unfairly in the rental market?

Mr. BURLEY. I don't. I see no problem, having done considerable work with shopping centers and retail spaces. A break in continuity really hurts all of the commercial space. It is essential to keep this pedestrian-way active and alive for its full length.

If the Federal Government keeps space inactive, it is really a detriment to the economic viability of the community.

Senator BUCKLEY. Thank you.

Mr. BARNETT. I would concur in the formulation of the pedestrian path. On the question of competition, I really do think there are some differences between cities, the rental markets in cities.

Really, the purpose of this bill is to give an option to the Federal administrator. I imagine there will be situations it wouldn't be appropriate to do it. I would hope there would be many situations where it would be appropriate.

Mr. WIEDERSUM. I have nothing to add, sir.

Senator BUCKLEY. I recall some years ago I was in a town meeting in a very small town. The great burning issue was whether or not a major route should be routed through the town or around it. Somebody got up and suggested that traffic should not be confused with progress.

Is there a mentality, you might say, of civic pride and so on that would cause mayors and other city officials to resist the idea of recycling because it would perpetuate old buildings instead of encouraging new buildings? Is there such a phenomenon?

Mr. BARNETT. I think actually architects have to take a certain amount of the blame for this because each generation of architects refuses taking for granted concepts of the previous generation.

The previous generation of architects were promoting the concept that all new buildings were superior to old buildings. The present generation of architects doesn't agree with this. The public accepts the formulation of the previous generation and has to be talked out of it. I think the modern architecture started out as a concept of revolution that would sweep away the past, but the profession to an extent has grown out of this idea. I think it has an obligation to educate the public. I have a feeling the public has never gone along with the profession. I have an uneasy feeling as an architect that any new building is considered by members of the public to be a step backwards from the old one. I wish that weren't the case. In many cases it is an inaccurate description.

Senator BUCKLEY. I gather from what Mr. Barnett said earlier that there may be something to the energy conservation aspects of this proposal but not a large amount. Would this be the normal presumption?

Mr. BURLEY. I feel there is, in addition to the conservation potential of traditional forms of buildings, which I think is fairly obvious, the energy potential, in the conservation of labor, materials, et cetera. I think that has been pointed out in some of the other statements that have been placed in the record.

Senator BUCKLEY. Nowadays any legislation that is proposed with the word "energy" in it is assured of much faster attention.

Mr. Wiedersum, you do some work in the area of smaller cities and towns. Do you see any special problems or advantages of this general approach in smaller localities?

Mr. WIEDERSUM. No, I do not; except we do a great deal of our work on Long Island. I don't believe you are going to find the number of

buildings—I know you are not—that you are talking about as you are going to find in the cities.

One other thing that might be a little more difficult. There is some talk of a Federal office building at Mitchell Field. I wonder if the inclusion of rentable space in a large building on Long Island would be as successful as it might be in a city.

I think these are studies that the GSA and others have to make to see if all of the contents of this proposal are adaptable to outside the cities.

Senator BUCKLEY. I appreciate that. The object, of course, is to expand the options available to GSA but also require them to go through the thought process of examining what is available.

In that general context, most people think of buildings in terms of their exteriors. Certainly the charm and variety and historical aspects tend to be visual. Should any special emphasis be placed on preserving interiors for adaptable use?

Mr. NEWMAN. I think, Senator Buckley, that the question certainly should be a part of the examining of any building, but that the determination really would rest on the individual quality of the building.

There are many buildings whose exteriors would be significant in terms of development of a style of architecture or in terms of being an important component of a neighborhood but whose interior is utterly irrelevant to either of those two functions the building might play.

The best answer would be dependent on the merits of a building, the Custom House at Bowling Green in New York is a building in which every possible effort should be made to preserve significant parts of the interior. They are as important as any part of the exterior of the building.

On the other hand, the Federal Office Building in Greenwich Village is a rather striking, compelling building from the exterior, but the interior is completely functional, and without any enormous appeal at all, and I think that there the concept of developing a productive reuse for the building should override any concern for the existing interior.

Senator BUCKLEY. If this legislation is enacted, the language should in effect emphasize the desirability of case-by-case appraisal?

Mr. NEWMAN. Yes.

Senator BUCKLEY. May I ask you gentlemen this question: Who do you believe would be the best agency or group to advise the GSA on potential sites for adaptive use, or should we go to a broad range of agencies and groups?

Mr. BURLEY. Senator, I made the recommendation that possibly this could be broadened to also include the Advisory Council in its capacity with State historic preservation officers and their, in turn, relationship to local historical commissions, and that perhaps a joint advisory relationship between the national trust and the Advisory Council might be explored.

Mr. BARNETT. I would strongly suggest that the GSA should consult in the localities involved with the staff of the planning commission, and if there is a landmark preservation commission with it as well. The expert knowledge of what buildings to save is likely to be centralized in those two kinds of agencies.

Mr. BURLEY. I think the national trust as mentioned in the bill is a very good route to go for advice. But I would like to add that the American Institute of Architects has State preservation coordinators throughout the United States.

For this kind of information you need local or regional advice. I think architects would be very happy to work in some cooperative way to give information to the national trust or whatever route might be established to supply this kind of information to the Government.

Senator BUCKLEY. Thank you.

Some people have suggested that adaptive and multiple use might invite problems with security, or problems with fire prevention, access for the handicapped, and so on. Do you see any particular problems in any of these areas?

Mr. BARNETT. I think there are problems. I think that as an architect, architects know how to solve these problems. I think there may well be administrative reluctance to any new procedure that may make a lot of trouble. I think local administrators are going to have to change procedures and have to do things they are not used to doing. The problem of wheelchairs and problems of fire safety can be solved if people will sit down and try to solve them.

Senator BUCKLEY. What about security?

Mr. BARNETT. Again, there is so much variety in buildings that it is hard for me at least to generalize about it. I think that kind of problem can be solved also. It may mean rather unpleasant changes in the building, restricting access and so forth, but it can be done if it has to be.

Mr. BURLEY. As a very practical security matter, I think our experience has been that some of these adaptive use buildings—which are liked by the public, they really like to use these buildings—have less vandalism than in new buildings which the public dislikes.

Senator BUCKLEY. Gentlemen, thank you very much. I appreciate your testimony very much.

Mr. BURLEY. Thank you.

[Mr. Burley's, Mr. Newman's, Mr. Barnett's, Mr. Wiedersum's and Mr. Lawrence's prepared statements follow:]

THE AMERICAN INSTITUTE OF ARCHITECTS

PUBLIC BUILDINGS COOPERATIVE USE ACT OF 1975

A STATEMENT BY

ROBERT A. BURLEY, AIA

THE AMERICAN INSTITUTE OF ARCHITECTS

TO

SUBCOMMITTEE ON PUBLIC BUILDINGS AND GROUNDS

COMMITTEE ON PUBLIC WORKS

UNITED STATES SENATE

WASHINGTON, D.C.

May 19, 1975

Mr. Chairman, I am Robert A. Burley, AIA, member of the American Institute of Architects Board of Directors and a practicing architect in Vermont. Today the American Institute of Architects, the national society for the architectural profession, wishes to express its strong and enthusiastic support for S. 865, the Public Buildings Cooperative Use Act. We commend the Committee for its consideration of this important legislation.

The Public Buildings Cooperative Use Act provides for conservation of the nation's building resources in a sensible manner. The legislation encourages the wise use of federal architectural and historic resources in order to increase the active, daily use of federal buildings on the part of the public. Not only does S. 865 establish a broad foundation for a more vital relationship between the federal government and the people, but it encourages the adaptation of federal buildings so they will function as integral parts of the urban environment. This excellent legislation will also conserve our increasingly scarce energy and material resources.

Perhaps no one would disagree that the objectives of S. 865 are worth striving to attain. But are they really attainable? We believe they are. We believe that the goals of this legislation are valid and that the methods set forth to attain these goals are realistic and practical. We will document our support for S. 865 with a series of slides and selected, actual case histories of multiple- and adaptive-use projects which have significantly contributed to their communities.

#### WISE USE OF THE NATION'S BUILDING RESOURCES

The Institute advocates the preservation of sound structures in active use whenever possible. Museums and museum villages have a legitimate and proper role in our society, but the bulk of architectural preservation in the United States should consist of buildings which continue to fulfill the daily needs of our communities. Ghiradelli Square in San Francisco is perhaps the best known example of adaptive-use in the United States, yet preservation-in-use has been practiced both publicly and privately for many years. European cities and towns offer countless examples of historic preservation through active-use. The active-use concept should be a first priority for obtaining federal working space, rather than just an occasional alternative. S.865 would give preservation-in-use, adaptive-use, and multiple-use the consideration they deserve.

#### CONSERVATION OF ENERGY AND MATERIALS

The utilization of building materials which have already been manufactured and installed in existing structures produces an obvious savings in materials, manufacturing, and construction energy. Many buildings of stone and brick masonry constructed generations ago are often more durable and of considerably better quality than that which we can afford to build today. Buildings which represent a less extravagant technological age, with reasonable proportions of windows to solid walls, have demonstrated their economic soundness in terms of heating and cooling costs. A single thickness of glass in a modern building allows twenty times as much heat to be lost from the building than an insulated

masonry wall. Even with insulated glass, the ratio is ten to one.

#### PRESERVATION OF OUR NATIONAL HERITAGE

We tear down and build anew. We trade our heritage for new drive-in facilities, taller buildings, or more parking spaces. We move from place to place with increasing ease, but perhaps with increasing loss of identity. Yet many of our cities still proudly display their historic development as evidence of the people who created them. Because our cities are rich fabrics woven from many fragile threads, historic buildings contribute to the texture of the contemporary urban fabric.

#### A GOVERNMENT FOR THE PEOPLE

Traditionally, government buildings have been giant monolithic monuments which shelter the bureaucracy and effectively prevent a vital and necessary interaction between government and the people. People approach government buildings only when they must; more often they simply trudge past.

S. 865 encourages federal buildings to remain open longer and welcome people for a wider variety of purposes. As such, the legislation encourages an increased dialogue between people and government. Buildings with daily commercial and public activity at the sidewalk level become vital parts of the urban environment rather than sterile, unapproachable facades.

#### COST SAVINGS

It is often imagined that restoration or rehabilitation of an older building involves endless repair and expense. This has sometimes been the case, but only when older buildings were restored piecemeal or when someone has tried to convert them to an unsuitable use or to an appearance which was never intended.

Practical restoration and adaptive-use have gained substantially in popularity during the last ten years, both in terms of owner attitudes and professional training and experience for architects, engineers, contractors, and others involved in the restoration process. Considerable credit for the increase in public acceptance of preservation projects should be given to the demonstration projects authorized by the National Historic Preservation Act of 1966 or assisted by the Department of Housing and Urban Development.

Actual case histories of adaptive- and multiple-use document the cost-benefit ratio of preserving old structures as compared with equivalent new construction costs. While the average saving is from ten to thirty per cent, financial savings of up to seventy per cent have been recorded. In virtually every case where an old building has been preserved for active, contemporary use, the public response has been overwhelmingly enthusiastic.

Ghirardelli Square, an adaptive-use of factory buildings, is one of the most popular attractions in San Francisco. Cost savings were not significant for the project when compared to the average cost for constructing new retail space at the same time. But there is no question that new construction in the same price range would be unable to achieve the same high quality of urban space.

Adaptive- and multiple-use projects need not be large to be economically advantageous. A private Vermont office building, originally a 1900 school house, was purchased for approximately \$8,000, including one acre of land and a trout stream. \$15,000 of improvements produced 3,000 square feet of comfortable, friendly office space. Allowing for the value of the land, the net

office building costs totaled approximately \$6.67 per square foot, about sixty percent less than the cost of comparable construction.

Another excellent example of adaptive use is a state office building in Montpelier, Vermont, reconstructed from an old hotel structure. The cost for rebuilding this existing hotel was \$27 per square foot, at a time when new office building construction was averaging \$30-\$35 per square foot. It is perhaps the only state office building in the country with a veranda and rocking chairs. Space is provided for state employees to enjoy summer lunches al fresco. Unfortunately, the old shops at the street level were eliminated in the rebuilding. Still, the project illustrates that a government building can preserve a very human character and at the same time save construction money and function efficiently.

The Showplace in San Francisco is yet another excellent example of adaptive-use. The warehouse structure was adapted for contemporary use as an interior furnishings showroom center. Sand-blasting the existing mill-construction heavy timbers to a clean, textured finish and exposing mechanical systems in a straightforward manner has produced substantial adaptive-use cost savings. The project was completed at about one-third the cost for comparable new construction. The new lighting combined with the bold, wooden character of the original structure has produced exceptionally attractive, useful space.

We believe that the Public Buildings Cooperative Use Act is a common-sense,

practical piece of legislation which clearly addresses the potential for the federal government to develop a more humane image.

We would recommend only one addition to the legislation. The relationship between federal properties and the community would be further strengthened if cooperative improvements and uses included areas between buildings and streets. Thinking horizontally, as well as vertically, ground floor levels might be expanded to include pedestrian traffic levels. Cincinnati, for example, has downtown walks, shops, and office entrances at a level above vehicular street traffic. Examples of major pedestrian circulation below ground are numerous.

In conclusion, we should like to add that architects would appear to benefit more directly from pushing aside the work of their predecessors and encouraging commissions for entirely new federal office projects. In a short term sense, that may be true. However, we should all recognize that America has produced many great architects, planners, and builders. Together they have produced city fabrics that are often sound and reusable, although often misunderstood and unappreciated. Federal government demonstrations that these cultural and physical resources can be wisely utilized will play a major role in the revitalization of our society. We encourage the federal government to undertake this leadership role.

Thank you for the opportunity to express our views.

My name is Anthony J. Newman and I am executive director of the New York Landmarks Conservancy, a not-for-profit, tax-exempt organization working for the conservation and re-use of buildings of architectural, historic or cultural merit.

Because of shortages in money and materials and because of the inflated costs of energy and labor, the past several years have seen a significant shift in the traditional development patterns in many of our cities. There has been a concurrent shift in the broad goals of those closely concerned with historic preservation. A prime factor in this latter change has been the awakening of a general realization that the wholesale destruction of older buildings was consigning important parts of our history to the rubble heaps. Preservation, therefore, has evolved into a major consideration in planning the future of our cities and towns.

Our perceptions of historic preservation have, indeed, become broader and more comprehensive. We no longer see valuable architectural expressions as buildings in isolation. We perceive them as important facets of a larger environment, as resources that make unique, essential and irreplaceable contributions -- both visually and psychologically -- to the humanity and livability of our developed areas.

These changes in what has been called historic preservation are so great and the realization of the need for the qualities that it

can bring to our lives is so strong that I would suggest it fitting that we cease speaking in terms of historic preservation and begin to consider these activities under the rubric of architectural conservation. Over the years, conservation has acquired a connotation of representing something that is needed and beneficial while preservation has about it an aura of the optional, desirable but not essential. Additionally, conservation implies keeping something alive and flourishing while preservation has the implication of keeping something from change.

Today's challenge with valuable older buildings is not to preserve them, intact, as they were 75 or 100 years ago. Rather, it is to keep those buildings, with all that is valuable about them, as vital and functioning components in a world of changing demands and technologies. Briefly, old buildings must be made to serve new purposes.

There is increasing evidence that this makes sense not only aesthetically and environmentally but also economically. That is to say we can conserve and re-use architecturally significant buildings, make the most judicious use of dwindling resources and energy supplies, and obtain attractive and functional space at costs which are, generally, significantly lower than the costs of demolition and new construction.

Without the consideration of site acquisition, which would apply in either the case of rehabilitation or new construction, the cost of

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constructing new office space in New York City will average \$50.00 per square foot. Broadly speaking, in the same market, assuming basic structural soundness, the cost per square foot of rehabilitated office space can be as low as \$30.00 per square foot -- a difference of up to 40 per cent.

Some of the reasons for this dramatic difference are immediately evident: in rehabilitation work one is usually dealing with existing foundations, exterior walls and roof. These savings are partially offset by the premium that is paid for doing work within the constraints of existing conditions. It must be remembered, though, that the rehabilitation of well-chosen buildings will preserve, for the general benefit, priceless examples of workmanship and character that are impossible to replace.

The costs of rehabilitation will, of course, vary according to the complexity of the building involved and the new use for which it is intended. These costs will vary in either direction. Butler Square in Minneapolis, the conversion of a warehouse into a mixed-use building of which office space is a significant part, is being completed at a cost of only \$20.00 per square foot.

The bill currently under consideration is, in many ways, a model response to the challenges entailed by the need to integrate important examples of our architectural heritage into the life of today's communities. It presents an opportunity for the federal government

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to share in and to give leadership to the growing movement to recycle structures which are important parts of the communities in which they are located.

A particularly commendable aspect of the bill is its recognition of the very strong advantages to be realized from making federally controlled space available for commercial, cultural, educational and recreational uses. Not only would government facilities become good and lively neighbors, creating feelings of accessibility about government properties, but the inclusion of such activities could be a determining factor in deciding, under the terms of this same bill, whether or not federal acquisition and utilization of space in landmark buildings is practicable. In many cases, older buildings have within them ground floor spaces which are of outstanding character but are not functional as office space. The ability to rent such spaces to revenue producing tenants such as restaurants, shops or performing arts groups will greatly enhance the viability of governmental ownership.

Undoubtedly, many of the buildings that will be considered for acquisition under the terms of the bill will be located in already developed downtown sections of large cities. Most older buildings of architectural distinction in such areas have unused development rights which will represent a valuable asset to the government upon acquisition of such properties as well as an important tool for influencing future development in downtown areas. The disposition

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of such development rights is a matter to which great thought should be given. Here, too, is an additional opportunity for the federal government to work with local jurisdictions to create ways of dealing with such unused development rights that will produce patterns of development responsive to the continuing need for the elements of humanity and livability in our urban areas.

The sponsors of the bill under consideration are to be congratulated for the foresightedness which is evident in its conception. Speaking for the New York Landmarks Conservancy I respectfully urge your positive action.

Thank you.

Statement by Jonathan Barnett, AIA, AIP  
Professor and Director of the Graduate Program in Urban Design,  
The City College of New York

on

S. 865, the Public Buildings Cooperative Use Act of 1975

before the

Subcommittee on Buildings and Grounds  
Committee on Public Works  
of the United States Senate

May 19, 1975

Mr. Chairman, I appreciate the opportunity to come here today to testify on S. 865, the Public Buildings Cooperative Use Act of 1975.

I believe that the legislation before you is sound and workable. It will provide a useful tool for the preservation and enhancement of our cities.

Senator Buckley said, in his statement introducing this Bill, that he did not see it as miracle working. This remark reflects a just appreciation of the nature of our urban problems. They are complex, their inter-relationships are even more complex -- and by no means fully understood. Their solution is unlikely to be found in a single, seemingly miraculous action. Instead, we have to try to solve urban problems by a series of steps, often relatively small in themselves, which over a period of time add up to progress.

This bill seems to me to represent this kind of useful step.

The people who plan and administer our cities have a great need to promote certain qualities of urban life which are best described by the words 'complexity' and 'continuity'. Complexity is the essence of what cities have to offer: the concentration of a multitude of activities and possibilities within a relatively small space. At the point when a city becomes a collection of office towers surrounded by parking lots, it has lost many of its vital attributes. I am not talking about cities versus suburbs, although I am a partisan of cities and I feel it would

be foolish to write off our existing urban investment, even if it were practicable to do so. As suburbs take on urban functions, they too have to provide for a complex variety of uses, they in effect become cities, with all the problems as well as the possibilities of urban life.

We have learned through hard experience that cities are delicate, vital organisms, and that drastic surgical changes can damage the whole urban economy, and society. Continuity between past and present is an important means of preserving cities, not just because of sentimental associations - although these are important - but because change in cities should be evolutionary.

The bill before you will help local planners and administrators promote both desirable urban complexity and continuity. Complexity, by allowing Federal buildings to contain a greater variety of uses and thus a stronger web of relationships to surrounding areas. Continuity, by opening up new possibilities for the adaptive re-use of old buildings.

I stress that this bill's great strength is that it represents a tool to be put into the hands of Federal officials and local administrators, not a direct prescription for a particular set of actions.

I know from my own experience as director of urban design for New York City, and from my work as a consultant in other cities, that significant opportunities have been missed in the

past for want of such legislation, and it will be useful in the future.

I should like to cite two particular categories of Federal buildings: old post offices and new Federal office buildings.

Downtown post offices, many of great architectural distinction, are being phased out by the Postal Service as it moves operations to ware-house buildings in out-lying areas. To the extent that this Bill encourages other Federal agencies to take over these post office buildings, it is performing an important function. If the issue is not already covered in other legislation, I think the Subcommittee should consider adding language that would encourage Federal administrators to take steps to insure continued use of important existing Federal buildings.

New Federal office buildings should be more than office buildings, as they house many services which require greater public access than the normal office floor. The provisions of this Bill should encourage architects and planners to re-think the nature of these buildings. A supermarket on the ground floor of a conventional Federal building would probably be inappropriate. Including some Federal services in a building, perhaps like a shopping mall, that contains other services, would probably make very good sense.

For some more general observations on preservation of old buildings and the promotion of mixed use in city centers, I should like to refer you to a book that I have recently written, entitled: "Urban Design As Public Policy." I am making a copy of this book available to the Sub-Committee.

I greatly appreciate the opportunity to speak in behalf of S. 865, which represents an important step forward, both substantively and in the approach to urban problems that it represents.

Thank you very much.

STATEMENT IN SUPPORT OF  
BILL S. 865  
"PUBLIC BUILDINGS COOPERATIVE USE ACT OF 1975"

BY

FREDERIC G. WIEDERSUM, P. E., PARTNER

WIEDERSUM ASSOCIATES  
Architects-Engineers-Planners  
Valley Stream, New York

The following statement in support of Bill S. 865, "Public Buildings Cooperative Use Act of 1975" is being respectfully submitted for the record Monday, May 19, 1975 by Frederic G. Wiedersum, P.E., Partner, Wiedersum Associates, Architects, Engineers, Planners, Valley Stream, New York.

The legislation proposed by Senator Buckley, Bill S. 865 would further the effort to preserve countless buildings which, because of their historical and architectural significance, contribute to our environment and enrich our culture. Equally important, they merit consideration because their rehabilitation to serve useful contemporary purposes is frequently economically feasible.

The intent of this Bill is not to create 'museum pieces', but to retain a sense of continuity in our lives by making the best use of existing structures of an historical nature. It is not so much a concern with these specific monuments or buildings, but rather with the living character of urban areas, villages and towns, which the presence of these structures serves to improve and reinforce. Urban design, which ties in new and old structures, adds in great measure to any environment.

Natural landmarks, often important design elements in cities, present urgent design problems in scale and character for any new development nearby.

When these problems are understood and sensitively handled, growth and change are acceptable events in urban life.

We are beginning to see that in the design of new buildings, we cannot continue to ignore existing context - that not only must any new building or complex respect its surroundings but it often makes sense to make fresh and inventive use of familiar images from the past in the design of new buildings, thus enlarging the scope of what an architect can accomplish.

The concepts of Mr. Buckley's Bill are being successfully emulated throughout the United States among both private developers and local governments. Not only are there economical advantages in the renovation of sound historical buildings, but with today's space planning and design technology, the amount of usable interior space can be increased considerably without interfering with the architectural facade.

One such example of a city government retaining its historical and architectural heritage is currently under construction downtown in the City of New York where the 24-story Municipal Building is undergoing extensive interior renovations. The 61-year old limestone exterior with its recessed pillars and ornate details will be retained untouched. The 65,000 square feet of interior space calls for the elimination of many small offices and the reduction of oversized corridors in favor of large open spaces. The interior will also be centrally air conditioned, the ceiling system will be acoustically treated and new lighting and plumbing systems installed. When completed, the structure will house an additional 1,500 city employees.

It has been proven in many instances that the construction cost of completely renovating an existing, structurally sound building proves to be less expensive per square foot than the cost of new construction. Many owners of existing office buildings and hotels in our nation's larger cities too quickly determine their buildings obsolete. As constantly updated zoning laws allow for taller and larger structures, these owners see only the possibility of greater profits through new construction. Thus, the old structure is termed expendable, thereby adding to the sad fact that the way to lose a heritage completely is one building at a time.

The major factor should be to give every consideration to expediency in deciding what to do with recycling older buildings, particularly if they are unoccupied for any length of time. The main enemy of recycling is abandonment, for it is during the period when maintenance is relatively absent that old structures may suffer a physical decay due to water damage or weathering of unprotected surfaces which, if left to deteriorate further could render the building too costly to recycle back into the mainstream of our architectural heritage.

The key to Senator Buckley's Legislation with reference to the preservation of historic and architectural buildings would be the detailed value and life cycle analysis of the structure in question by the Architects and Engineers. These surveys or analyses will give the General Services Administration a detailed description of the structure's life span as well as the condition and adaptation of the building's existing systems. Through innovative design techniques and the development of more sophisticated equipment through technology, the use of existing mechanical and structural systems could be retained, thereby reducing the cost of renovation and providing a more viable project.

When increasing the occupancy of an existing building by renovation, Architects and Engineers may become involved with code restrictions as well as structural reinforcement of foundations. These conditions impose a real necessity for research and field testing of existing conditions during the programming and pre-design phase.

There are many techniques which professionals can resort to in restoring buildings which may appear to be in advance stages of deterioration. For example, the use of the post-tension cable system can eliminate columns and create more unbroken interior space.

Older buildings which traditionally have had high ceilings are ideal candidates for the use of dropped ceilings which, in addition to being architectural features, are highly practical to serve as air plenums and to conceal ductwork and other mechanical systems. Then again, if appropriate, the Architect may decide to leave these systems exposed to create an interesting visual architectural feature and at the same time reduce the cost of renovation. From these surveys or analyses, GSA or the Architect will be able to accurately estimate the cost of converting the obsolete structure into a modern and usable Federal and public facility. Demolition should be the last resort.

A typical example of a project where preservation and remodeling occurred jointly was the Board of Trade Building in Chicago, completed several years ago. Modernization of the 45-year-old structure's interior space included the replacement of existing mechanical systems and conversion

to an all-electric energy system. By demolishing interior walls and incorporating modern office planning, the owners were able to convert an additional 180,000 square feet into new rentable space. More important, the building's external character and basic structure were preserved.

Demolition of old facilities often proceeds without any sincere analysis by owners of existing structures. The reasons for demolition are often described as structural weakness without a structural analysis having been performed; the high cost of renovating without assembling a careful estimate; limited life span of the building despite the fact that carefully maintained structural improvements would last many years; and the inability to adapt the building's interior space to current criteria, which can frequently be overcome by a detailed space analysis.

Publicly owned buildings present a clear opportunity for preserving local character, and when carefully and creatively analyzed they can offer economical and valuable space resources. This recycling of a neighborhood's historical background by preserving a vintage building not only saves the life of that particular structure, but more significantly it preserves and enhances the stability, unity and identity of the surrounding community.

An interesting case in point is the Jefferson Market Courthouse project, a New York City landmark on the corner of Sixth Avenue and Tenth Street in Manhattan, which was converted into a public library in 1967. The most important achievement was the building's favorable impact on the immediate surrounding community.

A Gothic structure, built with Victorian styled brick in 1875, the 24,000 square foot building, empty and neglected for five years, was to be demolished until a neighborhood landmark-conscious association successfully campaigned for its preservation. Initially, the crumbling condition of some of its brickwork and interior plaster, plus an extremely deteriorated roof condition would have seemed an impractical architectural challenge.

However, detailed analysis determined that its basic structure, with appropriate repairs, would permit the building to meet all necessary standards and code requirements. Interior spaces, with carefully planned architectural and mechanical detailing, were highly suitable for library purposes, and the cost was not considered excessive.

The work was performed, including repair of brickwork and interior structural reinforcement to meet the different load requirements in a library. In addition, new mechanical, electrical and fire protection systems were installed in unobtrusive areas, with cooling towers placed in trusses inside the pitched roof and air distributed through concealed grills. Confined interior spaces were redesigned and expanded. For example, partitions removed from three adjacent courtrooms created the large main reading room.

The result of this recycling has been very successful, not only because the distinguished historical nature of the building was preserved, but because it has attracted an influx of desirable new commercial shops and other enterprises which give the area the character of an urban center.

Many other structures in New York City have taken this recycling path. Fort Schuyler in the Bronx was converted to the Maritime College for the State University of New York ; the former Officers Club of Fort Totten has been a Job Core Center for the past three years; the old Cunard Building at Bowling Green in lower Manhattan, with its Great Hall, having stood idle for some time, was leased to the Government for use as a Post Office Station for sorting and mailing; the old Queens Register Building is now used as the Greater Jamaica Redevelopment office involving cultural and other affairs; and numerous other structures have been recycled including the former Brooklyn Fire Department Headquarters Building with its open spaces, currently designed to become an educational facility, according to plans developed by Polytechnic Institute of New York.

One of the most important structures in the race against diminishing our architectural heritage is the renowned Wainwright Building in St. Louis, the first modern steel frame skyscraper in the world, designed by Louis Sullivan in 1890. After considering various alternatives, a design competition was held which resulted in the decision to hopefully preserve and restore the 10-story structure for State offices.

There are vacant multi-story buildings in many communities throughout our nation which were originally designed for manufacturing usage. These facilities usually incorporated large open areas that would be compatible with the office space usage of today. The utilization of the lower floors could easily be converted into a shopping arcade, restaurant, recreation facility or other commercial space.

Until very recently, older industrial buildings did not attract developers of new commercial areas, yet these old buildings have great potential for new business neighborhoods, often with a built-in picturesqueness that is hard to achieve. Their intrinsic values often are both aesthetic and practical, for the warehouses of the late 19th Century were handsome buildings of architectural strength as well as sturdy construction, and even their later counterparts of the early 20th Century have virtues that the imaginative eye can find.

Furthermore, these old buildings enclose a volume of space that cannot be economically equaled today. They are unique opportunities for conversion to new and contemporary uses. Bold color and graphics, effective landscaping and plazas can revitalize a neighborhood.

A new office structure presently under construction in lower Manhattan in New York City contains the first covered pedestrian space to be completed under new zoning developed by the Urban Design Group of the Department of City Planning and the Mayor's Development Office. These special regulations allow the developer to increase the floor area of buildings in return for private public amenities such as underground concourses, arcades and plazas.

When contracting a new Federal office building in the future, the initial design criteria should include space allocations for public and commercial usage, such as the 23-story Tishman Tower Building in Los Angeles where the first floors of the office tower and parking structure are devoted to commercial and shopping facilities. This same concept, if used in a Federal office building, would provide added revenue where under the present system no revenue is available to counties or states in which the facility is located.

Ground floor levels should be so designed that they can be easily adapted to a tenant's requirements. Design flexibility in these areas will allow the owner to make tenant changes without major construction alterations. This concept of space coordination by the owner would, in the writer's opinion, be ideal for use by retail, educational or culturally-oriented tenants. By adapting a rental policy that will be economically acceptable to the surrounding community, a Federal facility will truly become a focal point of that community's activities.

It was the writer's privilege to serve for several years on the Regional 2 Public Advisory Panel on Architectural Services for General Services Administration during which period he had the opportunity for discussions with panel members and GSA personnel. This provided firsthand insights into current and future needs in the design and construction of both new and renovated Federal buildings.

It may be a sentimental thought, but our nation's future physical growth will be a reflection of the past, grown more sophisticated only because our complex society demands change in a continually changing world. As all of us, both those whose activities require new space, and the Architects who translate that need into tangible structures, we should occasionally pause and assess the inherent values of what we are doing.

As surely as our needs will endure for a long time to come, the newest structure containing the best of modern technology will one day be the subject of decision by a future generation as to its continuing value to society. With that in mind, we should consider both the old and the new as equally essential to our heritage.

## STATEMENT OF PETER G. LAWRENCE, PROGRAM DIRECTOR, NEW LIFE FOR OLD BUILDINGS, HARVARD GRADUATE SCHOOL OF DESIGN

It is a distinct privilege for me to be here in support of Bill S-865, the Public Buildings Cooperative Use Act of 1975. I strongly endorse the purposes and intent of this bill and also believe there is broad-based support for such legislation. A strength of the bill that goes beyond its stated purposes is that it is based on the extensive background work prepared by the Federal Architecture Task Force of which Senator Howard H. Baker, Jr. is a member. The two task force staff reports, *Federal Architecture, Multiple Use Facilities* and *Federal Architecture, Adaptive-Use Facilities* provide detailed documentation of the case for enacting this legislation.

The purpose and intent of this legislation is "to promote more efficient use of the Nation's construction resources" within a broad context that is not limited to the preservation of a few landmark buildings, "to foster the preservation of buildings of historic or architectural significance" by giving such buildings first consideration when planning for the office needs of the Federal Government, and "to enhance the social and economic environment within and surrounding Federal office buildings" primarily by encouraging the use of Federal office buildings for other uses, including commercial, cultural, educational and recreational purposes.

Passage of the bill will achieve many ancillary beneficial results. Several of these key points deserve review. A mixed use approach in Federal office buildings will result in a lower total cost to the Federal Government due to the proportionally higher rents that may be charged for prime commercial space, such as ground floor locations. Mixed use will also generate increased revenue for the city in which the building is located in the form of payments in lieu of taxes. Finally, by encouraging commercial activities and increasing pedestrian traffic these areas will become safer.

My primary interest is to encourage the conservation and effective use of the man-made environment. America has a large and valuable inventory of older existing structures, many of which are of architectural or historical significance, while others are quite commonplace. The loss of any of these buildings serves to destroy a quality of material and labor craftsmanship which can never be replaced. The reuse of older buildings, whenever possible, preserves a rich and varied architectural heritage and conserves scarce resources of materials, energy and capital: we are living in a tightly constrained economic and ecological environment, and we must eliminate senseless consumption, and being conservative of our existing resources.

While introducing S-865 on February 27, 1975, Senator Buckley stated that the intent of the bill is "not an effort to pick an occasional historic building and then renovate it." He anticipates that opportunities will be found for the renovation of many older, run-down buildings for Federal use, and I strongly agree. Adoption of a Federal building policy which encourages the reuse of existing buildings will spur Americans to protect, preserve and maintain the man-made environment, and help us maintain a sense of continuity with history and scale in our urban areas.

The reuse of existing buildings for office space and the development of mixed use buildings are concepts that have recently been gaining wider acceptance. There are many excellent examples which attest to the great potential of this approach. I would like to describe several particularly significant examples of the application of these concepts.

One Winthrop Square, the old *Record American* Building, in Boston is an excellent example of the economic viability of mixed use in a recycled structure. The architecture firm of Childs, Bertman, Tseckares converted the building into modern commercial and office space last year. An extremely successful undertaking, this project shows that reused buildings can provide economic advantages to developers and be highly marketable.

The cost of the renovation work was \$32 per square foot. The total cost of the project, including the acquisition price, was \$40 per square foot. The cost of new construction of comparable quality performed during the same time period plus the acquisition price of the site would have been about \$70-\$80 per square foot. One half of the ground floor, about 10% of the total space, is commercial and rents for about \$11 per square foot. The architect, Charles Tseckares, points out that if the building were located in the central commercial area, the ground floor rents would be higher. The remaining 90% of the gross space of this building is utilized for offices and rents at about \$9 per square foot.

When completed in October, 1974, the building was already 20% rented. Today it is 60% occupied and 90% rented as tenants complete the finishing of interior spaces. Such recycled space enjoys strong acceptance in the marketplace. Rapid rent-up allows the developer to achieve a quick return on invested capital. Typically, rent-up in this project is more rapid than is normally experienced with new construction. Furthermore, the mixed use concept benefits the tenants and the visiting public. New life and vitality has been brought to an area where little commercial activity existed previously.

The proposal for the renovation of Union Station (New London, Connecticut) by the Boston architecture firm of Anderson Notter is an exciting example of the conversion of National Register property into office and commercial space. This 22,000 square foot building, designed in 1895 by H. H. Richardson, will retain its function as an AMTRAK station and will also provide several floors of office space and a restaurant. The cost of this renovation project will amount to about \$32 per square foot, there being no acquisition cost for the property.

The alternate proposal to the City Development Authority for the site of Union Station would have cost about \$100 per square foot to construct a concrete block structure. Of the 5,000 square feet proposed for the new building, about 3,000 square feet would have been utilized by AMTRAK. The current reuse proposal, however, will provide AMTRAK with 5,000 square feet of higher quality space at less rent. Lower rent is possible because AMTRAK will utilize a smaller percentage of the total space in the building.

While this reuse proposal creates more space for less cost per square foot, it also involves a greater total project cost. The larger total investment will infuse more capital into the New London area. Greater tax revenues will also be created for the city because of the far greater volume of commercial space in the reuse proposal. New London will benefit from an expanded tax base. The investment will provide jobs for the construction industry while the visiting public and employees will bring life to the remnants of an important transportation network, perhaps encouraging greater use of AMTRAK services.

Many small business owners prefer to locate in existing buildings because the aesthetic and nostalgic value of older buildings enhances their ability to create customer appeal. Increasingly, small business owners are seeking locations in older buildings realizing that these buildings possess unique qualities and amenities which are extremely expensive or impossible to duplicate in new structures.

One such company is the Boston confectionery firm of Bailey's which has always established its retail stores in older buildings. Franklin Wyman, Jr., the present owner of Bailey's, has stated, "I believe . . . strongly in leasing older Boston buildings and those in the suburbs that have escaped urban renewal." A recent article in the *Christian Science Monitor* described Mr. Wyman's reasons for wanting to utilize older buildings. These structures, he said, exhibit a "touch of history" and engender respect for both the buildings and the past accomplishments of the city.

I would like to reinforce something many of us here realize, but which many others do not—there is extremely broad-based support for conservation and continued use of existing buildings. Reuse is not merely a passing fad or the cause of a vocal few. Many people realize that these buildings were often constructed in a unique fashion, making the structures irreplaceable representatives of our past. People appreciate the qualities of scale and harmony with the surrounding environment that old buildings provide. This support is considerable and growing as is evidenced by the increased membership in the National Trust for Historic Preservation.

In addition, more and more people are beginning to view older buildings as a valuable resource of energy, time, capital and craftsmanship. Such people consider the destruction of any building to be a waste. To them reusing these resources just makes sense.

Robert Campbell, an associate of the Cambridge architecture firm of Sert Jackson and architectural critic for the *Boston Globe*, stated recently at Harvard that almost all the mail he receives from readers is overwhelmingly negative about new development projects, especially the large scale projects. Conversely, readers respond quite positively to the articles he has written about renovation projects.

Sentiment in support of building reuse is also growing among professionals. The seventeen week course, *New Life for Old Buildings*, which I am currently directing through Continuing Education at the Harvard Graduate School of Design, is

being attended by two hundred city and town planners, contractors and architects. Normally a Continuing Education program might draw only forty people. The New Life for Old Buildings program has received requests from universities throughout the country that also wish to establish similar programs.

At the Rhode Island School of Design, the graduating class of architecture students select projects on which they work during the final five months of their program. Over 75% of the students in this year's graduating class chose projects relating to preservation and reuse of old buildings.

In order to reflect more effectively the purposes and intent of this legislation, I respectfully propose that the Committee consider the changes listed below.

Insert the words in parentheses and strike what has been omitted so that Section 12(c) of the Public Buildings Act of 1959 page, Lines 4-12 of this bill is amended to read as follows:

"(c) Whenever the Administrator undertakes a survey of the public building needs of the Federal Government within a geographical area, he shall (seek recommendations from the Advisory Council on Historic Preservation and the National Trust for Historic Preservation to identify any existing buildings within such geographic areas which are of architectural or historical interest which would be suitable whether or not in need of repair, alteration, or addition, for acquisition or purchase to meet the public buildings needs of the Federal Government. (Should such significant buildings not prove feasible the Administrator will actively consider other existing buildings whether or not in need of repair, alteration, or addition, for acquisition or purchase to meet the public buildings needs of the Federal Government.)"

The duties of the Advisory Council include commenting on Federal undertakings having effects upon properties listed in the National Register of Historic Places; coordinating Federal, State, local and private preservation efforts; disseminating information; and, generally, advising the President and the Congress on historic preservation. In these capacities the involvement of the Advisory Council here seems to be quite appropriate.

As presently written, it appears that the bill does not explicitly go beyond landmark preservation. The wording of the last section has been strengthened to insure that the spirit and intent of the law can be achieved.

Thank you for giving me this opportunity to express my support for S-865 and to offer you these suggestions.

Senator BUCKLEY. Our concluding witness this morning is Mr. Meisen of the General Services Administration.

Mr. Meisen, you may read your statement or introduce it for the record.

#### STATEMENT OF WALTER A. MEISEN, ACTING COMMISSIONER, PUBLIC BUILDINGS SERVICE, GENERAL SERVICES ADMINISTRATION

Mr. MEISEN. Thank you, Senator. I would like to have it placed in the record in total and just synopsise it quickly, if I might, so that we might answer your questions.

Senator BUCKLEY. Fine. [See p. 92.]

Mr. MEISEN. I am Walter A. Meisen, Acting Commissioner of the General Services Administration's Public Building Service and Deputy Administrator for Special Projects.

It is my pleasure to appear before you on behalf of Arthur F. Sampson, GSA's Administrator, to discuss this bill, S. 865, which proposes to:

Promote more efficient use of the Nation's construction resources, to foster the preservation of buildings of historic or architectural significance, and to enhance the social and economic environment within and surrounding Federal office buildings.

As the principal manager, builder, owner, and lessor of Federal buildings in the United States, the General Services Administration has a fundamental commitment to the betterment of the total environment of America's cities and towns.

We feel a special sense of responsibility for promoting the integration of the human element into the planning, construction, use and maintenance of buildings.

Mr. Chairman, I would like to mention that our concern for the built environment is not new. You will be interested to know that in April 1972, at Mr. Sampson's request, we sponsored an International Environmental Conference on Building Construction and Use.

Representatives from the United States, Canada, Japan, Mexico, and France produced ideas and made valuable recommendations examining the impact of construction on our environment. Two major recommendations of that conference concern the multiple use of Federal buildings and the renovation and reuse of existing buildings.

We, in the General Services Administration, strongly support the concepts introduced in S. 865. As mentioned, we have long promoted the concepts of historic preservation and the multiple use of Federal structures. We, therefore, feel that such a combination of activity would be well worth pursuing.

Mr. Chairman, it is important to note that while we have established commercial operations such as giftshops, bookstores, drycleaners, florists, barbers, homefurnishing stores, and so on, in many of our buildings through the Small Business Administration's 8(a) programs and handicap enterprises as set forth by the distinguished chairman in the Randolph-Shepard Act, we have not significantly contributed to the mix of activities that combine to enhance external vitality and give life and excitement to the neighborhood environment. On the contrary, these businesses primarily serve occupants of the building, and Federal buildings have reinforced the image of a downtown, which is lacking in vitality, with streets that become deserted after working hours.

There are many benefits to be gained from the multiple use of Federal buildings and especially older, or seemingly obsolete, structures. Beyond the obvious advantages which have already been mentioned, we must recognize other important factors. First is the issue of resource scarcity.

For years we have gone on the assumption that we have had limitless supplies of land, energy, and money, but recent events have made it clear that this is no longer a valid assumption.

The renovation of older buildings, for the purposes stated in S. 865, will produce facilities that can play a major role in the effort to make more intensive use of available resources.

Another advantage of these concepts is that of energy use. If people were able to walk to work or shopping areas conveniently, ultimately there would be less traffic congestion, less demand for roads, and less fuel consumption.

In addition, the renovation of existing structures will provide a lower consumption of energy per construction dollar and lower consumption of natural resources per construction dollar than new construction.

When comparing renovation to new construction, the former would generally result in less noise pollution, less traffic disruption, and less impact on sanitation and other environmental systems.

These are important issues, but there are others that we cannot ignore. Because restoration and renovation usually require a higher level of handcraft trades, these projects will nurture trades and crafts which are fast becoming nonexistent in the United States. Through S. 865, we could augment Federal efforts to preserve and rejuvenate historic buildings while helping to preserve the valuable cultural resource.

Mr. Chairman, multiple-use Federal buildings, and the attempt to preserve culturally significant buildings, places the emphasis of the Federal building program on serving the total public interest, and not merely serving the past objective of simply providing Federal agency space.

Through S. 865's architectural preservation provisions, where the situation is warranted, PBS would be able to help preserve the important architectural heritage of our culture. This act will, therefore, enable the Government to become a partner with the community in an attempt to meet public needs and goals, which are the very reasons for any government program. However, the success of its application, we believe, will depend on changing Government assumptions about building purposes so that multiple use is not just allowed but actively promoted.

It has proven successful for the governments of Japan, Canada, and Sweden and it can be successful for our Federal Government. For all of these reasons, the GSA supports the concept of S. 865 and we welcome the opportunity to meet its requirements and challenges.

Before closing, I would like to submit for the record several comments that GSA has to offer the members of the subcommittee, or the subcommittee staff, for their information and use. These will be submitted with the total text of my presentation.

Thank you.

Senator BUCKLEY. Thank you, Mr. Meisen. They will be printed in the record. [See p. 99.]

You spoke a minute ago about the desirability of actively promoting multiple use. Do you have any thoughts as to how GSA would go about doing this?

Mr. MEISEN. One of my concerns is that we probably will be inundated initially with requests for use of space. I think, as mentioned earlier by a number of speakers, we are talking about a question of attitude.

There is no doubt there will be problems involved in both the administration and design of facilities. Unless an attitude is taken on the part of our Agency, and others that are involved in the programs, regarding potential cost problems, we could find many reasons for not having as much commercial activity or as much multipurpose use as might be possible if we took a positive approach.

I want to assure you, Senator, that we propose to do all in our power to generate as positive an approach throughout all GSA regions and our headquarters office.

I think our response to an initial effort to make viable commercial facilities in Federal buildings is probably the biggest impetus to furthering the idea.

We have to take a positive attitude and do all we can in this legislation to make sure it is viable and do all we can to facilitate its operation.

Senator BUCKLEY. You mentioned that the statutory changes that you are recommending are technical in nature.

Mr. MEISEN. Yes. One of them, for example, was to change the contact point to say that we feel it should be the Advisory Council on Historic Preservation and the State historic preservation officers.

We feel we have been using them with an early warning system in this capacity in the past. It is only a recent development, and is about 1 year old. It has worked very, very well. We have gotten prompt responses in all the particular areas we contracted on.

Senator BUCKLEY. Would it cause any problems to broaden the number of contact points, to broaden it even further than that?

Mr. MEISEN. If it would not present a problem to the Advisory Council. We would, of course, prefer to have them as the contact point for the AIA, the State preservation officers, and all of the other interest groups which might exist locally.

They have a very good system of maintaining those kinds of contacts in local areas. If we could work through one coordinating body, it would be extremely helpful.

Senator BUCKLEY. It was suggested that some of the space might be made available for certain types of activities at less than commercial rates. If you were given the authority to do this, would this create any special problems, administratively?

Mr. MEISEN. I think if we were talking about commercial activities it might give us some difficulties. I am also concerned about the rent. I think the comment was made in relation to, I thought, of office use of other cultural groups.

Senator BUCKLEY. That is right.

Mr. MEISEN. I don't know whether this would create any problems. Once we start going into that area and start renting space at less than commercial rates, which is basically what we should be charging our Federal agencies as well, I don't know.

I would have to look into that a lot more seriously. Clearly, if it is surplus, if it was surplus space to our needs, I don't think we would have much difficulty with that.

Senator BUCKLEY. If you have any second thoughts or afterthoughts, I would appreciate your sending them in. We will keep the record open for a week for that purpose.

Mr. MEISEN. Certainly.

Senator BUCKLEY. Several people have suggested that we broaden the limitation to include mezzanine or possibly the rooftop areas. Do you have any thoughts on that?

Mr. MEISEN. Yes. One of the other comments that I am also submitting recommended a change in the working, where we just say it should be changed from "on the ground floor" to "on the public access level." Basically, it is any levels that have direct public access. I don't know

if the roof would be a viable area. That might create problems of through traffic that might be more expensive to solve. We certainly think it should be broadened to say all public access levels of the building.

Senator BUCKLEY. In your experience, is one of my premises of this legislation correct that renovation gives more jobs per dollars spent than any other kind?

Mr. MEISEN. Yes. I think this is true. Clearly, if you are talking about any given time frame, you see, if a \$10 million building stretches over 4 years, you might have 200 or 300 people employed during those 4 years. But if you had 10 \$1 million renovation jobs, they would all be working at the same time because you would have more jobs simultaneously and you can put more people into a renovation job because the floors are there. In other words, you can work on seven floors in the building at a time; while in new construction you are waiting for foundations to be finished, then for the steel to go up. It takes a while to cycle in.

While our original estimates indicated five times as many, we now think, generally, about three times the number of people are employed in renovation work than are in new construction for an equal amount of dollars. It is certainly true if you count the time period.

Senator BUCKLEY. Under the bill as introduced, GSA is required, first of all, to assess the viability of an existing structure and then to make an assessment of the feasibility, the cost-benefit tradeoffs, and so on. I think it was Mrs. Shipley who spoke of the desirability of loosening that somewhat, so that a value could be placed on intangible benefits. Do you believe the planning needs to be broadened in any way to give you greater latitude in making those judgments?

Mr. MEISEN. I think in the case of buildings that are architecturally significant, or historically significant, that decision becomes much easier.

In a registered building, for example, or one that is eligible for the "National Historic Register," we would have a little less difficulty as opposed to just an older building that someone wanted to offer us. Determining what its significance is might be a lot more difficult.

Of course, our whole recommendation is based on the premise that it might cost more and, therefore, some type of a value must be put on that unless you are going to just let economics dictate it.

While I agree that you can do renovation more economically, you can also have to experience considerably more money. If, in fact, it was truly economically viable, strictly on economics, I think we would have seen much more renovation than is going on.

I think some of the pressure you see, you asked before why would a city likely not care for this. There are a number of driving factors in this. One is tax income. If it is a 6-story building that might sustain a 40-story office building, the tax income from a 40-story office building is significantly greater than the 6-story building. There is incentive then to drive the value of that property up. The city sometimes is anxious to get that tax income.

In other cases, mud and smut tear down every building in its way. They are looking for a new Federal building in a new urban renewal area to try to be a catalyst for development of private office buildings.

So they might prefer you to go into an urban renewal area rather than buy somewhere else. So I think there are drives within cities.

I am concerned more about the best cost of a property. I think renovation is marginal and borderline cost effectively when you own the property.

For example, a government-owned building that we want to convert, we find the costs come out very close. Sometime the difference is the ratio of how much usable space you get compared to the gross amount of space. Usually it is estimated in gross cost. If you can only use half the space because of big, wide corridors, your relative efficiency goes down.

Take the same Federal building, we don't own it, it is a private building, if we have to add on those renovation costs, we have to buy that property from a current owner, and he is looking at the building potential of that site for a 40-story office building, his value of that piece of land might be quite high, especially if the city is encouraging the use of that property for a 40-story building.

You can see we might not be able to afford buying that property at its highest and best price and then still do whatever renovation is necessary.

I see this clearly as a concern as it affects Postal Service buildings, and that came up, I believe, with Mr. Garvey. They are currently finishing a large number of central bulk-mail-handling systems.

When those are completed, there will be many, many old post offices that will be surplus to their needs. We have a first option to buy them back from the Post Office. They, in their legislation, have the right to expect the current market value.

If that current market value has to be paid by GSA, or else they will sell them and demolish them for other building sites, we might have a difficult time, economically, because we would have to add that again to the cost of renovation.

Small post offices are difficult renovation problems as far as cost is concerned. We find it very marginal even when we own the post offices. If we have to buy it and then renovate, I think we will have much more of a problem.

I would like to see some kind of legislation that would require them, if it is a historic post office, to give it back to the Government. But I know we are talking about an area that is not within this committee's jurisdiction, perhaps. But it is a serious problem. We are going to lose many post offices throughout the country unless something like that can be developed.

Senator BUCKLEY. Thank you very much. I think, Mr. Meisen, that the subcommittee will submit a number of additional questions to you for the record.

Also, we want to insert three newspaper articles in the record.

[Mr. Meisen's prepared statement, responses to additional questions, and the newspaper articles follow :]

Statement of Walter A. Meisen  
Acting Commissioner  
Public Buildings Service  
U.S. General Services Administration

before the  
Subcommittee on Buildings And Grounds  
United States Senate  
May 19, 1975

Mr. Chairman and Members of the Subcommittee:

I am Walter A. Meisen, Acting Commissioner of the General Services Administration's Public Buildings Service and Deputy Administrator for Special Projects. It is a pleasure to appear before you in behalf of Arthur F. Sampson GSA Administrator to discuss a bill, S. 865, which proposes to "promote more efficient use of the Nation's construction resources, to foster the preservation of buildings of historic or architectural significance, and to enhance the social and economic environment within and surrounding Federal office buildings."

In the past, Federal buildings have been viewed as cold, concrete edifices entered only by those who either work in these sterile environs or individuals who had business with the Federal Government. Recent innovations in architectural style and design of Federal buildings has helped to erode the negative attitude toward such monolithic structures. The concepts embodied in S. 865 will make the Federal building and its occupants more a part of the community it serves by opening the doors to the public. This legislation can also become a vehicle for the revitalization of downtown areas of our cities.

As the principal manager, builder, owner and lessor of Federal buildings in the United States, the General Services Administration has a fundamental commitment to the betterment of the total environment of America's cities

and towns. We feel a special sense of responsibility for promoting the integration of the human element into the planning, construction, use and maintenance of buildings.

Obviously, we of GSA have a large stake in and an enormous responsibility for the improvement of our environment. Our Public Buildings Services is responsible for 10,000 federally owned or leased buildings; 1700 construction projects underway; a billion dollar annual budget; 22,000 employees, and an inventory of a quarter of a billion square feet of building space across the country.

Mr. Chairman, I would like to mention that our concern for the built environment is not new. You will be interested to know that in April 1972, at Mr. Sampson's request, we sponsored an International Environmental Conference on Building Construction and Use. Representatives from the United States, Canada, Japan, Mexico and France produced ideas and made valuable recommendations examining the impact of construction on our environment.

I mention our international conference because its purpose is fully supportive of the concepts proposed by the distinguished Chairman and ranking minority member of this subcommittee as well as Chairman Randolph and Senator Baker. First, the bill S. 865 would allow a cooperative, private/public use to space in Federal buildings. The GSA conference report stated in 1972 that "the idea of multiple-use buildings is growing, and in the consideration of the city as a 'home' rather than a 'marketplace', there is good reason

to consider the use of the lower floors of Federal buildings for mercantile purposes."

Second, S. 865 would encourage, where practical, the renovation of older buildings, thereby converting them to useful Federal space. In this regard, our conference report recommended "that GSA should use its influence to maintain and create variety in terms of architecture and use. This would include consideration of preservation of historic buildings and areas for community-oriented, multi-purpose public buildings."

We in the General Services Administration strongly support the concepts introduced in S. 865. As mentioned, we have long promoted the concepts of historic preservation and the multiple use of Federal structures, and therefore feel that such a combination of activity would be well worth pursuing.

Cities have always had multiple-use planning. In many older neighborhoods, apartments typically were built above stores that lined the street level. And recent examples of vertical mixing, that is some combination of retail, parking, office, recreational and residential use in a single structure, can be found in Marina Towers and the John Hancock Center in Chicago and in the United Nations Plaza in Manhattan. City planners have acclaimed these buildings for their potential in revitalizing core areas.

Frequently, however, neither private nor public office buildings are designed to contribute to the active movement of people amid diverse settings, or to provide opportunities for planned or chance encounters, or to encourage the interplay of varied activities, or to promote the compatibility of building facades at a scale easily used by

pedestrians. When the employees go home in the evening, the surrounding streets are left empty and after-hours activity is discouraged.

This diminished human vitality of many downtown areas is a serious problem and Senate bill 865 provides an approach for the solution.

Mr. Chairman, it is important to note that while we have established commercial operations such as gift shops, book stores, dry cleaners, florists, barbers, home furnishing stores, and so on, in many of our buildings through the Small Business Administration's 8(a) programs and handicap enterprises as set forth by the distinguished Chairman in The Randolph-Shepard Act, we have not significantly contributed to the mix of activities that combine to enhance external vitality and give life and excitement to the neighborhood environment. On the contrary, these businesses primarily serve occupants of the building, and Federal Buildings have reinforced the image of a downtown which is lacking in vitality, with streets that become deserted after working hours.

There are many benefits to be gained from the multiple-use of Federal buildings and especially older, or seemingly obsolete, structures. Beyond the obvious advantages which have already been mentioned, we must recognize other important factors. First is the issue of resource scarcity. For years, we have gone on the assumption that we have had limitless supplies of land, energy and money, but recent events have made it clear that this is no longer a valid assumption. The renovation of older buildings for the purposes stated in S. 865 will produce facilities that can play a major role in the effort to make more intensive use of available resources.

Another advantage of these concepts is that of energy use. If people were able to walk to work or shopping areas conveniently, the ultimately there would be less traffic congestion, less demand for roads and less fuel consumption. In addition, the renovation of existing structures will provide a lower consumption of energy per construction dollar and lower consumption of natural resources per construction dollar than new construction. When comparing renovation to new construction, the former would generally result in less noise pollution, less traffic disruption, and less impact on sanitation and other environmental systems. These are important issues, but there are others that we cannot ignore: Because restoration and renovation usually requires a higher level of hand-craft trades, these projects will nurture trades and crafts which are fast becoming non-existent in the United States. Through S. 865 we could augment Federal efforts to preserve and rejuvenate historic buildings while helping to preserve the valuable cultural resource.

Since renovation also tends to be more labor oriented---per construction dollar than new construction---it would mean more jobs. Mr. Chairman, I would like to point out to the members of the Subcommittee that a \$1 million investment in repair and alteration work produces five times as many new jobs as \$1 million in new construction activity. This comparison cannot, of course, be taken literally in all cases, but it does illustrate that possibilities exist through this legislation for substantial and effective payoffs is worthwhile employment.

I would mention briefly that there are other benefits or advantages to various provisions of this bill which include:

- Provides additional conveniences for Government employees.
- Augments further the aims and intent of the Intergovernmental Cooperation Act.
- Establishes a viable partnership between the Federal Government and various sectors of the community.
- Creates job and business opportunities for the local community.
- Relieves some of the burden borne by local communities in preserving older structures.

We would, of course, be naive to think that there would not be problems or adjustments to be made. Security must be considered, but the question is not multiple-use vs. security, and we are confident that through quality design and planning this problem will be resolved. Especially when we have multiple-use ground floors.

Other issues such as payment-in-lieu of real property taxes; policy deviations such as maximum space utilization, fire safety, handicapped facilities and budgetary adjustments would of course need to be addressed. But as I mentioned at the beginning of my statement, we have faced the issue of multiple-use of space for several years and are well along in our planning for such a program.

The impact of the Federal Government---through legislation, regulation, taxation---is already felt in virtually every sector of our economy. When it is justified as being in the public interest, the Federal Government competes with private enterprise on a mammoth scale. But the significant public benefits to be derived from multiple-use Federal buildings are ample justification for the relatively minor

Federal intervention in the market economy that would be required to implement S.865.

Mr. Chairman, multiple-use Federal buildings, and the attempt to preserve culturally significant buildings, places the emphasis of the Federal building program on serving the total public interest, and not merely serving the past objective of simply providing Federal agency space. Through S.865's architectural preservation provisions, where the situation is warranted, PBS would be able to help preserve the important architectural heritage of our culture. This act will therefore enable the Government to become a partner with the community in an attempt to meet public needs and goals, which are the very reasons for any Government program. However, the success of its application, we believe, will depend on changing Government assumptions about building purposes so that multiple-use is not just allowed but actively promoted.

It has been proven successful for the government of Japan, Canada and Sweden and it can be successful for our Federal Government. For all of these reasons, the GSA supports the concept of S.865 and we welcome the opportunity to meet its requirements and challenges.

Before closing, I would like to submit, for the record, several comments that GSA has to offer the members of the Subcommittee, or the Subcommittee staff, for their information and use.

THANK YOU,

ATTACHMENT

PBS:5/15/75

## RECOMMENDED CHANGES TO LANGUAGE OF S. 865

1. On page 1, line 6, before the word "operating", add "constructing".
2. Since GSA provides various types of space for the Federal Government, page 1, line 8 should be revised to read "Space necessary for the accommodation of Federal agencies..."
3. To assure that the Administrator of GSA is not limited to a single method for satisfying Government space needs, we recommend that on page 2, line 2, after the word "shall" the phrase "upon his determination that it is in the best interest of the Government--", be inserted.
4. On page 2, line 14, after the word "building", insert "unless inconsistent with local zoning regulations or planning objectives."
5. Page 3, lines 12 through 15. We recommend deletion of this subsection because, in submitting prospectuses in accordance with other sections of the bill, this concern will be fully addressed.
6. Page 4, lines 4 through 12, should be revised to read as follows:  
"(c) Whenever the Administrator undertakes a survey of the public building needs of the Federal Government within a geographical area, he shall consult with the State Historic Preservation Officer and the Chairman of the Advisory Council on Historic Preservation to identify within 30 days any existing buildings within such geographical area which are of architectural or historic interest and which may be suitable, whether or

not in need of repair, alteration, or addition, for acquisition or purchase to need the public buildings needs of the Federal Government." This, we believe, is a more practicable method for identifying potential adaptive-use buildings.

7. Page 4, lines 18 and 19, the phrase "on the ground floor" should be replaced with "on the public access level," since in some buildings ground floor space is below grade and not suitable for commercial activities or public access.

## RESPONSES FROM GENERAL SERVICES ADMINISTRATION

*1. How does one determine when an old building should be saved?*

The decision to save an old building would be based upon an analysis to determine if the facility can be economically adapted to suitably house Federal agencies when compared with other available alternatives. Factors such as efficiency in space utilization, safety standards, energy consumption, etc. would be included in the analysis. If the analysis should indicate that a particular old building was the best alternative for satisfying the Government's need, then it would be retained (if Government-owned) or acquired. It is important to note that this type of analysis is currently used in all our Project Development Reports.

*2. Who will make decisions as to what historical or architecturally significant buildings will be converted to multiple use?*

The Administrator of General Services, based on the recommendations of the Commissioner of the Public Buildings Service (or by delegating authority thereto), will have the final responsibility in determining whether a particular building of historic or architectural significance should be converted to multiple use. Obviously, this would be done only after careful analysis of community needs, commercial feasibility of multi-use facilities in the building, and the intended use of the building by the Government. Consultations with local planning officials, business leaders, community associations, and other interested parties would also be required as part of the analysis.

*3. What kinds of buildings might not be suitable?*

There would not seem to be any class of building (except perhaps those housing a high proportion of high security agencies) which would be excluded from consideration for multiple use. Otherwise, decisions would be made on a case-by-case basis, with appropriate consideration of economic factors, community needs, etc. There would not necessarily be any great difference in the nature of the analysis of architecturally or historically significant buildings, as distinguished from merely old buildings, although policies may be developed to permit some premiums for the former categories.

*4. Could the term "architecturally significant" apply to a modern building?*

We see no reason why certain modern buildings could not be considered architecturally significant.

*5. Do you advocate that the Government purchase historic buildings outright, or that it lease them? And, question 13. Is leasing of such structures practical? Doesn't that denote a sort of temporary arrangement, leaving the ultimate fate of a landmark building undecided?*

We believe that the most desirable method of preserving buildings of historic value would be outright purchase. A leasing arrangement is only temporary, and at the end of the lease term we would be faced with the alternatives of either letting the lease expire or entering into a new lease arrangement.

*6. Is building restoration to original appearance desired?*

We believe that in most cases, restoration to the original exterior appearance would be most desirable, since the total character of the structure could only be exhibited if the building were returned to the original state specified by the architect. However, this may not always be practicable and in such instances restoration should only echo the original appearance through the retention of its significant architectural characteristics. Generally speaking, building interiors would have to be converted to current standards to satisfy the operating needs of occupying agencies, and to comply with health and safety requirements.

*7. Couldn't the rehabilitation cost equal that of new construction?*

Generally, rehabilitation would cost less than new construction. However, in some cases it would cost more if the scope of work were very extensive and required expensive materials and workmanship.

*8. As a national policy, do you think that money can actually be saved by converting old buildings into modern office and other mixed-use space, instead of building new ones? Does GSA have figures to substantiate this?*

GSA does not have sufficient experience, particularly with regard to multiple use facilities, to support a policy statement of this nature. Development of such

a policy would, of course, involve analysis of complete life-cycle costs, including occupant agency operating costs and revenues from commercial tenants.

9. *Can life-cycle costing of rehabilitated buildings and new buildings be favorably compared? Can a cost-benefit ratio be established, or has it been, that shows a definite cost advantage, of one over the other, to the government?*

See answer to Question No. 8.

10. *Wouldn't the projected life-expectancy of a restored old building still be a matter of conjecture, as compared to that of a modern new building? Wouldn't it actually be much less?*

Generally speaking, the projected life-expectancy of a restored building is more conjectural than in the case with a new building. The degree of conjecture with respect to older buildings would depend on the extent of investigations of structural integrity, adequacy of mechanical systems, etc. Actual retention periods would vary according to investments for restoration (or modernization) and general maintenance during the period of occupancy.

11. *Do you think that old buildings can be suitably converted to meet fire safety requirements and other code stipulations? Can facilities for the physically handicapped be provided? What are the major construction problems that will confront GSA with respect to rehabilitation?*

Most older buildings usually have some inherent limitations with regard to the latest code and accessibility requirements. However, many can be successfully adapted to comply with current standards without serious violation of their historic or architectural integrity. Each building has to be assessed individually and some of the areas of concern would be:

1. Does the building have or can it be renovated to provide fire containment materials/facilities?
2. Can a system be developed within the building to detect fire and notify the occupants for evacuation?
3. Can systems be installed in the building that will extinguish a fire?
4. Can evacuation routes be established that would ensure safe exit from the building in case of fire?
5. Is the building structurally sound to withstand normal natural forces such as wind, snow loads, earth tremors, etc?
6. Can minimum facilities for the handicapped and elderly be provided?

12. *Are landmark buildings now insured against fire or other damage? What would their status be in this respect if the Government bought them or, in some instances, leased them?*

We have no way of knowing, of course, which "landmark" buildings, owned by private parties are insured against fire or other damage. We assume that the owners have such insurance. With respect to landmark buildings which are owned by the Federal Government, the General Accounting Office has consistently held that as a matter of policy the Federal Government, as a self-insurer, should not expend public funds to insure Government-owned property. In the event the Government leased a private "landmark" building, any insurance necessary for the protection of the owner's investment will be a matter for the owner to decide.

13. *Is leasing of such structures practical? Doesn't that denote a sort of temporary arrangement, leaving the ultimate fate of a landmark building undecided?*

See Question No. 5.

14. *What priority would be given to leasing old buildings, as against leasing new ones? Which is the present policy?*

Currently, in acquiring lease space, the Administrator has the authority to select, from a number of responsive offers, the one proposal which in his determination represents the best interest of the Government, price and other factors considered such as the susceptibility of the space to efficient layout and the availability of adequate housing, public transportation, eating facilities, etc. Under S. 865, as now written, there appears to be a priority established, first, to acquire space in historic and/or architecturally significant buildings; second, older buildings; and, finally, construction or leasing of new buildings. We believe that the objectives of the bill can be readily achieved without this priority and have recommended that the language of the bill be modified so that the Ad-

ministrator has adequate flexibility in determining the means of satisfying agency space needs in given situations.

*15. Is rehabilitation of old buildings a good investment for the Government, from the standpoint of economic feasibility, as compared to new construction?*

The economic feasibility of restoring older buildings can only be discussed in general terms, as each case must be decided on its own merits. When applied to the restoration of *historic* buildings, and from a strictly economic viewpoint, an economic analysis will usually indicate "no". However, consideration must be given to the extent to which the Government finds it desirable to pay a premium for the historical and cultural contributions which these buildings provide to the communities in which they are located. As previously mentioned, rehabilitation of older buildings in our inventory is one of the alternatives considered in connection with all proposed construction projects.

*16. In your opinion are reconstructed old buildings conducive to energy conservation? And question 20. Do you feel energy savings will be substantial?*

Older buildings can be reconstructed to be generally conducive to energy conservation if special attention is given to such matters as thermal insulation, openings, refitting of fenestration to reduce infiltration, etc. However, it should be noted that they may not compare favorably in terms of energy conservation with those research buildings now on the drawing boards. Obviously, the degree of energy efficiency in older buildings will depend on the investment to be made in energy conserving features and materials.

*17. Do you feel that a substantial percentage of GSA's public buildings program should be diverted to the acquisition and rehabilitation of old buildings? How about leasing?*

We believe that our program should continue to be devoted to housing Federal agencies in first class space. If this can be economically achieved through the rehabilitation of older buildings, we would have no objection. We do not believe, however, that a priority should be established for restoring buildings that are merely old as implied in S. 865.

*18. Would there be any conflict in jurisdiction over buildings already in national trust and those to be acquired by GSA?*

In the event GSA acquires a building eligible for listing on the National Register, GSA will take the appropriate steps to nominate the building for the register. With respect to buildings which are on the register and are acquired by GSA, the National Historic Preservation Act requires that before any alterations are made, GSA consult with the Advisory Council on Historic Preservation. This consultation procedure does not create any conflict in jurisdiction over the building.

*19. How can enactment of S. 865 promote more efficient use of the nation's construction resources?*

If enacted, S. 865 would promote a more efficient use of our natural resources because many of the existing components, such as the steel and masonry materials, would be utilized to the greatest extent practicable. This, of course, would be in contrast with new construction which would involve the manufacture of new materials on the one hand, and eventual destruction of many of them in the older buildings on the other.

*20. Do you feel that energy savings will be substantial?*

See Question No. 16.

*21. What effect would enactment have upon GSA's public buildings program generally?*

The enactment of S. 865 would have a significant impact on our buildings program. Both the multi-use and historical preservation sections would significantly affect the planning and construction areas. Our planning studies and the scope of our consultations with local authorities would have to be broadened to include local retail and service markets and community needs in terms of commercial, cultural, recreational, and educational facilities. The acquisition of architecturally and historically significant buildings could possibly result in the establishment of "localized" Federal complexes where agencies having similar activities could be collocated. This would be in contrast to our current

practice of consolidating agencies to the greatest extent practicable in a single building or a complex of buildings within a one or two block radius.

Providing non-governmental space in Federal buildings will also affect building design. Considerations, such as circulation, visibility, and flexibility, would call for more "openness," while security and safety considerations would probably require additional (but not necessarily more apparent) restrictions. Design will also be affected by the need for, and the desirability of, providing different kinds of graphics and other appurtenances at ground level, both internal and external. Design beyond the immediate envelope of the building will be affected by the same needs, plus community involvement in developing impinging urban design elements.

Further, the mixed use of public buildings as proposed will result in the need for increased security. This will necessitate the use of Federal Protective Officers in these buildings during the evening hours and on weekends. In lieu of the use of Federal Protective Officers, it may be necessary to utilize contract guard service. In either case, additional costs will be involved.

22. *What design and construction problems will be encountered, adapting old buildings to modern office and other usage proposed?*

Our past experience indicates that there are three basic design challenges in rehabilitating older buildings to provide modern office space. They are: space utilization, energy conservation, and adequate fire protection and safety improvements. It must be recognized that there will be occasions where it will be structurally and/or economically infeasible to convert certain older buildings to meet our current minimum standards, and we do not intend to invest our construction funds into those types of buildings. Our decisions will be quite difficult in this regard when the building in question has been found to be of historical or architectural significance. In such cases, we would have to determine that the benefits to be derived in preserving an historic structure would outweigh any marginal disadvantages concerning space utilization and perhaps energy conservation.

However, if the building cannot be converted to provide a safe and healthful environment for employees and visitors, it should not be acquired by GSA for use by Federal agencies.

23. *Who do you anticipate would do most of the design and supervision associated with restored old buildings . . . architects in private practice or government? Should there be design competition?*

Qualified A-E firms in private practice selected on a competitive basis would do most of the design and supervision of the restoration projects. However, GSA staff architects will have to manage the project programs for the Government. As a general rule, design competitions would be impracticable, as well as expensive.

24. *On what basis are A-E contracts generally awarded for rehabilitation of old buildings?*

All A-E contracts are awarded through essentially the same procedural process. The basic requirements of the procedure are: public announcement of the project in the *Commerce Business Daily*, evaluation of qualifications and past performance of those firms responding to the announcement, interviewing and rank ordering in terms of qualification of at least three, usually five to eight, of the firms with regard to the specific project, and finally, negotiating with the firm best qualified to perform the job until an acceptable offer is received or, if unsuccessful, proceeding in rank order with the other firms until an acceptable agreement is reached. This is the process prescribed by the A-E Selection Act (PL 92-582), commonly referred to as the Brooks Bill. The basic difference in the selection of design professionals for new construction as compared to rehabilitation work is the emphasis given in the evaluation process to experience in the alteration and restoration field. This is in keeping with our policy of selecting the best professional firm for the particular project in question.

25. *In your opinion, which provides more jobs, new construction or alterations?*

The alteration project provides more jobs, per dollar of cost, than new construction. The dollar ratio depends on the overall dollar cost, but normally varies from 1½ to 2 times in favor of alteration type work. If the repair and alteration project dollars are spent in 1 year, versus a 3-year construction cycle, then the

dollars are further intensified by a ratio of 1 to 3 in favor of alteration type work.

26. *Do the same OSHA requirements apply to construction as the new work? Do you have any comments on this?*

Our interpretation of the OSHA regulations is that they apply equally to reconstruction, as well as new work. The law requires that each employer provide a safe and healthful work place for his employees. It makes little difference if the work place is old or new. Deviations from the OSHA regulations are only permitted when they equal or exceed the level of safety intended by the specific regulations.

27. *Would such use conflict with local building codes or zoning restrictions if mixed use were contemplated?*

GSA Public Building Projects are not subject to local building codes. The legal foundations for noncompliance are rooted in the supremacy clause of the Constitution (Art. VI, 2nd paragraph) which provides that the Constitution and the laws of the United States made in pursuance thereof shall be supreme law of the land. Enforcement of local or state building regulations would be in conflict with Federal policy, since section 10(c) of the Public Buildings Act of 1959, as amended, requires that the Administrator of General Services shall be responsible for all construction authorized by the Act.

With respect to zoning restrictions, Title VIII of the Intergovernmental Cooperation Act of 1968 requires the Administrator, to the extent practicable, to comply with and conform to regulations of the unit of local government having jurisdiction relating to planning and development before making a commitment to acquire property and buildings or to change the use of such property in an urban area. No such requirement exists, however, with respect to property located outside an urban area. It should be noted, nonetheless, that section 2(b) of S. 865 requires the Administrator to consult with and solicit comments from local and state governments in carrying out his duties under section 2 of the proposed bill.

28. *How would parking problems be resolved?*

In the acquisition of an historical structure to satisfy our program needs, parking will be as much of a program requirement as in any other acquisition of space. The distinction lies in the fact that onsite parking, either within or adjacent to the principal structure, may not always be available. In those instances, the required parking will have to be provided by some other means, i.e., additional land acquisition and/or leasing. Obviously, the cost of this parking will have to be included in the economic analysis of the available alternatives to satisfy our program needs.

29. *Does your research indicate any reluctance on the part of local officials to accept rehabilitation in lieu of new construction?*

Although "revitalization" in the past has meant razing an area and constructing new buildings, this concept appears to be changing, and planners are becoming more and more concerned about integrating existing structures and new construction. It must be recognized that a further educational process may be necessary in this regard with respect to many local officials. Although we concede there will be instances when the Government's plans to rehabilitate buildings will be contrary to local planning objectives, we do not anticipate any universal reluctance on the part of the local officials to accept rehabilitation. Certainly, in our consultation with them, we will emphasize that we do not propose to maintain buildings as senseless intrusions in the community. On the contrary, we would present them as rejuvenated participants in the growth activity around them.

30. *Do you feel that various agencies, to whom you now rent space, will be content in a rehabilitated building when competitively priced space is available elsewhere in new buildings, more conveniently located?*

Improving the quality of space which they occupy has been a major objective of most Federal agencies over a period of many years and, in the minds of most agency officials, "quality" is virtually synonymous with a relatively new building which is in an area convenient to their clientele.

There certainly will be a reluctance on the part of some agency officials to accept old buildings which they consider will fall short of optimizing their operating effectiveness. It is also likely that such reluctance will be fortified by the fact

that the Standard Level User Charge they will be required to pay may be substantially the same at the two alternative locations.

It will be incumbent on GSA, therefore, to assure that the older facilities offered have sufficient appeal to overcome agency objections in the majority of cases.

*31. Is this bill compatible with the intent of Executive Order 11512?*

A reading of both documents could lead to the conclusion that there are major conflicts between the bill and the Executive Order. For example, greater dispersal of agencies may occur by virtue of the emphasis the bill places on the acquisition of historic buildings. Since historic buildings generally are not on the scale of modern first class office buildings, the opportunity for consolidation of entire agencies or groups of agencies in these older buildings would be substantially lessened. In addition, the historic buildings could be located outside the downtown area of a city. Thus, governmental operations would be dispersed which could hamper the efficient performance of the missions and programs of some executive agencies contrary to the intent of section 2 of Executive Order 11512.

However, these disadvantages might be minimized through the acquisition of a group of architecturally or historically significant buildings, thereby establishing "localized" Federal complexes where agencies having similar activities could be collocated. This would, to a large degree, satisfy the general intent of Executive Order 11512.

*32. What impact would enactment of S. 865 have upon urban planning in large cities? Isn't the idea generally to renew and revitalize depressed inner-city areas, as directed by E.O. 11512? What if the buildings selected for rehabilitation were not in these areas?*

The impact of S. 865 could be very favorable upon urban planning in large cities. In the 1960's planning was based on the total clearance—bulldozing—of inner-city areas, followed by construction of new homes and businesses. City planners are now modifying their thinking in this respect. Such planning now seeks to preserve existing structures where renovation is feasible. Rehabilitation alleviates the total displacement and alienation that resulted from the urban "removal" projects of the 1960's.

E.O. 11512 does not dictate new construction, but is directed to all types of Federal acquisition of space. The heart of 11512 is that the Federal Government, in its facility acquisitions, becomes a partner with the host community and seeks locations where the community feels the maximum socio-economic impact can be achieved.

Reflecting today's planning techniques, where rehabilitation is a key element in revitalization, S. 865 will give the Federal Government the option to participate in revitalization of inner-city areas when city plans and other conditions indicate rehabilitation is the preferred course of action.

*33. What effect would population distribution have? Unemployment? Moderate-price housing availability?*

In determining when and where to acquire Federal buildings, the local population distribution, the availability of low- and moderate-income housing, and the socio-economic benefits of the proposed action are given full consideration along with the program needs of the Government. In considering whether to acquire an historic structure to satisfy our program needs, these factors would be evaluated as with any other alternative. In this connection, it should be noted that conversion and alteration have a greater impact on unemployment per dollar cost than new construction.

*34. Who will make decisions regarding the selection of occupants in converted buildings scheduled for mixed or multiple use?*

The Administrator in consultation with the Public Buildings Service will determine the type of commercial, cultural, educational, and recreational activities that will occupy buildings scheduled for multiple use. These determinations will be made after an analysis of local desires and planning goals; zoning requirements; the nature of the Federal activities to be housed in the building; the nature of the businesses, if any, in the general area; and the environmental impact of a multi-use operation.

*35. Would preference necessarily be given to non-profit or minority groups? Otherwise, why can't contracts for space be competitive?*

Preference will be given to non-profit or minority groups only to the extent required under the Randolph-Sheppard Act and the Executive Orders 11458 and

11625. It is recommended that the Committee reports or the bill should make it specifically clear the bill's intention with respect to the aforementioned Act and Executive Orders.

Competition in awarding contracts will be used to the greatest extent practicable to insure that the Government obtain the maximum rental possible. However, to insure that there is a proper mix of commercial, cultural, and recreational uses of space, or to give preference to businesses that formerly occupied the site on which the building was constructed, it may be necessary at times to contract for space on a negotiated basis without competition.

36. *Would space used for art, education, and recreational activities be supported entirely by revenue from rent charged other occupants? How could businesses then compete with others not burdened with such arrangements?*

Under section 4 of S. 865, it would be our intention to insure that the Federal agency or other sponsoring organization responsible for the cultural or educational activity would pay for the space such an activity occupied in a Federal building.

37. *Do you think that the local business sector would resent the idea of the Government encouraging competition by providing space in a Federal building?*

Although it is likely that some objections will result initially, we believe that it will soon become apparent that the effect of leasing space to non-Federal activities can be a positive rather than a negative factor. Before deciding on which types of activities would be most suitable for occupancy in a Federal building, an analysis of the local commercial market would be made to determine what is needed, what businesses have the best potential to succeed, and what will have the most beneficial impact on the community. Obviously, firms that would drive other concerns out of business would not meet this criteria. It should also be noted in this connection that a degree of competition is needed to insure the success of individual concerns. For example, it is a well-established principle in the planning of shopping malls that most business have some form of competition either from competing stores or others marketing similar products. Thus, there are nearly always two or more stores of the same business in such malls.

38. *What tax advantages will accrue to local governments as a result of commercial establishments in mixed-use buildings? What are some of the problems GSA could have resulting from mixed use?*

Section 4 of S. 865 provides that state and local governments would receive Federal payment-in-lieu of taxes on any space in Federal facilities leased to commercial activities. These payments would, most likely, be based on the fair market value of the space as determined by GSA staff, or contract, appraisal.

Making such payments could be a major bookkeeping workload for GSA. The actual disbursement of payments, the account in the Treasury from which they should be drawn, and to whom specifically they should be made, is not clearly defined in the bill. Procedures will have to be established, in conjunction with OMB and the Treasury Department, that will adequately provide for disbursements.

39. *Do you know of any legislation that might be in conflict or laws that should be revised to achieve the objectives of S. 865?*

No. S. 865, if enacted, would not be in conflict with any other provision of law.

40. *Are there any revisions that should be made, in addition to suggestions already given?*

No.

[From Preservation News, May 1975]

PRESIDENT'S COLUMN—FEDERAL ARCHITECTURE

(By James Biddle)

In another report for its continuing study *Federal Architecture: A Framework for Debate*, the Federal Architecture Task Force of the National Endowment for the Arts said last November, "No one in his right mind goes into a public building except on business." Furthermore, the report continued, since business is usually conducted only between the hours of 9 and 5, public buildings are dead the remainder of the time and add a death pall to those other buildings around them.

I was pleased to note recently an initial legislative attempt to remedy this situation. The U.S. Senate now has before it a bill to permit not only the mixed use of federal buildings, but also the adaptive use of old buildings as federal office space.

Sen. James L. Buckley (R/Cons.-N.Y.) introduced S. 865, the Public Buildings Cooperative Use Act of 1975, on February 27 and said, "I see this bill as a way to enhance the environment of our cities while saving money." He went on to explain that the proposed legislation was not "miracle working," but rather an attempt to make existing federal law more flexible.

Senator Buckley's bill was cosponsored by Sen. Howard H. Baker, Jr. (R-Tenn.), Sen. Jennings Randolph (D-W. Va.) and Sen. Robert Morgan (D-N.C.). Senator Baker, who has displayed an interest in historic preservation, is one of two Congressional members of the Federal Architecture Task Force and Senator Randolph is chairman of the Committee on Public Works, to which the bill was referred.

The legislation has two basic parts. It would amend two existing laws to permit the federal government to lease street floor space in its buildings for commercial, cultural, educational and recreational purposes, a technique that has been used successfully in Canada. It would also, and this part is of particular interest to the National Trust, encourage the federal government, through the General Services Administration, to buy old buildings and convert them into offices.

"Such an approach—an effort to recycle what is worthy and well built in our architectural heritage—would produce many benefits," said Senator Buckley. He listed some of them as saving energy, reducing construction costs and being more labor-intensive for employment. The senator added that such a plan, "may also have the salutary effect of slowing the push toward consolidation of all federal offices in one giant concrete monolith per city. We can reasonably question whether or not the local Secret Service office must be across the hall from the local Forest Service office."

The General Services Administration is directed by the legislation to contract with the National Trust for an inventory of possible local renovation alternatives when it makes a space survey in an area. Said Senator Buckley, "I would anticipate that the Trust and GSA would find opportunities for renovation in many older, rundown office buildings, warehouses, railway stations, theaters and so on."

I was pleased to note that the legislation does not say that only properties listed in the National Register of Historic Places should be considered for reuse. As important as the National Register is, there are many buildings of architectural or historical interest that are simply that; they are interesting and add to the overall ensemble of a city or community but do not meet the criteria needed for National Register status. These are some of the buildings most frequently being demolished and are the ones we must also try to save.

In response to requests by Senators Buckley and Randolph, the National Trust has indicated it supports this legislation. The concepts of multiple use and adaptive use are ones that will benefit all—from those who work in the buildings to those who shop there and live in the neighborhood. And everyone benefits too when a part of our past is saved and reused.

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[From The Christian Science Monitor, April 25, 1975]

#### UNCLE SAM'S GENERAL STORE

(By William Marlin)

WASHINGTON.—Uncle Sam has built thousands of public buildings. At least they are called public buildings—post offices, picnic shelters in the national parks, court houses, the regional headquarters for myriad agencies, military barracks, mints, weather stations.

The thing is, most public buildings, especially those plunked down in the center of our cities, are stand-offish in physical scale and downright unneighborly in relation to the ongoing life of the communities around them.

With all the character of a shoulder-high banking counter, except for the assemblyline symbolism of bald eagles, flags and agency emblems, the entrance areas of these buildings convey a cold-shoulder message: Stay away unless you have business here.

That is no way to house the services of a government which is supposed to be of, by and for the people. Perhaps, as E. M. Forster, the English writer, once suggested, we should yell out at least two cheers for democracy—and insist on at least two uses for the public buildings which we pay for.

Early next month, the Senate Committee on Public Works begins hearings on the Public Buildings Cooperative Use Act of 1975 (S. 865), introduced in late February by James Buckley (R) of New York with the cosponsorship of Jennings Randolph (D) of West Virginia, Howard Baker (R) of Tennessee, and Robert Morgan (D) of North Carolina. This is called, in capital parlance, bipartisan support, and here is why S. 865 deserves it.

This bill would conserve money, conserve jobs, and conserve the salutary scale and identity of important urban districts. Why else, it might be asked, would a conservative like Mr. Buckley come out for it?

For the first time, multiple uses, meshing of public and private functions, would be encouraged so that, in ground-floor areas, commercial, cultural, educational and recreational activities could add a vital dimension, for employees and visitors alike, to the presence of government on our streets.

If a court room and an IRS office can co-exist in the same building, why can't a court room and concert hall? If a post office and a Secret Service headquarters can function within a couple hundred feet of each other, why can't a post office and a shopping concourse? Why should the only evidence of life and laughter around a public building be the splashing of a fountain, or the palaver of people brown-bagging lunch, or some lonely sculpture abstracting the isolation of the buildings it is meant to enhance? Mr. Buckley's bill would unbend existing law so that the needs of government can be accommodated along with the public's.

A second provision of S. 865 would encourage the adaptation and reuse of worthy, well-built existing buildings which, dove-tailed with the multiple-use measure, would bring the public into closer proximity, on a daily basis, with the evidence of America's incredibly rich architectural heritage.

The bill thus gives cultural values a chance to break even with economic ones. Older buildings, for example, use considerably less energy than do many new ones and, don't forget, it takes a whopping lot of energy to tear down an old building and then replace it.

Another dividend pertains to America's unemployment lines. In case you were wondering what preserving old structures has to do with putting bread and butter on the table, it might be useful to point out, as the General Services Administration did in February, that a million dollars for repairing and improving an existing federal building produces five times as many jobs as does the construction of some spanking new slab.

The Public Buildings Cooperative Use Act may seem somewhat peripheral to many Americans during these perilous days, but it embodies the essence of the relationship between people and government. By engaging a wider spectrum of activity, not for just eight hours a day but into our evenings too, and by making good use of the buildings we already have, this bill would have a beautiful bearing on the way our downtowns look from now on, and on the way we think about and use the resources of government.

Given this enlightened legislation, Uncle Sam's public buildings should have a lot in store—the kind of store which many would welcome the chance to mind.

[From the New York Times, June 17, 1975]

#### DEGLACIATING THE FEDS

The image of the Federal Government is monolithic, glacial and dull; it is an image created by Federal buildings, which are monolithic, glacial and dull. In and out of Washington, most of the structures put up by the Federal Government are temples to 9-to-5 bureaucracies, usually devoid of any sign of extra-governmental life. Their distinguishing characteristics are lack of style and soul.

A bill in Congress now would change all that. It would not only revolutionize Federal architecture, but profoundly alter its impact on cities and neighborhoods.

First, this legislation, introduced by Senator Buckley of New York and backed by the General Services Administration, would encourage the Government to utilize the country's existing architectural resources. Instead of automatically producing those still-born monuments, the G.S.A. would be required to explore the use of older buildings and existing spaces, where suitable, including land-

mark-quality properties. Part of the process would be consultation with the National Trust for Historic Preservation on the local availability of such structures. This is a long way from earlier Federal practice of declaring its own historic buildings Government surplus and knocking them down to the highest parking-lot bidder.

Second, and just as revolutionary, the restrictions that have guaranteed the sterility of Government buildings—the prohibition of all non-Government uses—would be lifted. The rental of space to commercial enterprises would be permitted, with an eye to reinforcing the area's functions. Cultural, educational and recreational uses of a building's facilities would be treated as desirable. This would not be restricted just to the ground floor where Government construction habitually assassinates the street, but would take place in auditoriums, courtyards, rooftops and lobbies as well.

The impact would be far more than architectural. Instead of an after-5 o'clock surreal landscape of locked doors and empty, echoing spaces, Federal construction would promote the health and vitality—and even the safety—of a city. Design dedicated to the social and economic improvement of the environment would be a fine substitute for instant Federal wastelands. We are delighted that the approach of the Bicentennial is bringing out the revolutionary in Senator Buckley.

Senator BUCKLEY. Thank you very much.

A statement from the Council on Environmental Quality will, without objection, be made a part of the record.

[The statement referred to follows:]

EXECUTIVE OFFICE OF THE PRESIDENT,  
COUNCIL ON ENVIRONMENTAL QUALITY,  
Washington, D.C., June 10, 1975.

Hon. ROBERT MORGAN,  
Chairman, Subcommittee on Buildings and Grounds,  
U.S. Senate, Washington, D.C.

DEAR SENATOR MORGAN: It is my pleasure to submit for the record these comments on S. 865, the "Public Buildings Cooperative Use Act of 1975." As Chairman of the Council on Environmental Quality, I am reminded daily of the enormous impact Federal actions can have on the man made environment. Federal investments and support in housing, transportation, sewers, defense facilities, energy development, parks, health centers and educational facilities exert an important influence on the form and function of the cities we live in. It is also clear that the location and design of Federal office buildings, courthouses, veterans hospitals, and other structures in cities, an investment of 83 billion dollars, can have important effects on the surrounding environment.

Each year about a billion dollars is spent to construct new Federal buildings across this country and about half that much is spent to lease property for Federal use. With so much money being spent on some 2.5 billion square feet of office space, it makes good sense to examine the impact of the investment.

In this regard, S. 865 appears to be a very useful piece of legislation. It recognizes and encourages the positive contributions that Federal buildings can make to their surrounding environment. It places special emphasis on making use of existing buildings of historic or architectural significance, both by encouraging their retention and rehabilitation when already in Federal hands, and by encouraging their purchase or lease to meet Federal space needs. In addition, S. 865 encourages the location of commercial, cultural, educational, and recreational facilities and activities within or near public buildings in ways that add to urban vitality and encourage use both during and outside of regular hours.

The Federal Government has a responsibility to assure that its action contribute to humane and enriching public purposes—particularly when to do so also conserves energy, natural resources and costs. While we would not recommend that our cities become museums of the past, the past's fine architecture preserved and complemented by creative and compatible new construction, where appropriate, can contribute to an environment which is diverse and rich in memory, activity, and design.

There is a precedent for adaptive use of historic buildings by the Federal Government right here in Washington. Across the street from the White House, Lafayette Square Park is edged on two sides with red brick row houses in scale

with the Park, the White House and the 18th Century St. John's Church nearby. Some twenty years ago when more courtrooms and office space were found necessary, the houses were to be torn down and replaced with large and unwelcoming buildings. Fortunately, because of Presidential concern, there was a stay of execution and the houses were remodeled into handsome offices. As one of the tenants in those townhouses, I think it is the most civilized Federal space in town. Ample new buildings of related materials and detail were added behind the old ones connected by planted courtyards, and the space needs were satisfied by retaining the old and blending the new.

Also in Washington the Old Executive Office Building was saved from the bulldozer and stands today as graceful and useful space next door to the White House. Across the street, the Renwick Museum has been restored and put to public use, and the Federal Home Loan Bank Board Building is under construction, carefully designed to include mixed uses which serve the surrounding area. In other cities, GSA has restored and put to good use older court houses and Federal buildings. In San Francisco, the Old Mint, abandoned and cobwebbed, was restored with care by the U.S. Treasury Department to become a museum of coins and of San Francisco's lively and grand past.

Too often in the past, however, there has been an attempt to centralize Federal office space in cities by putting all agencies, related or not, under one roof in a new building of little architectural distinction. Visually the building has been set off from the others around it and is locked up and left at the end of the day. S. 865 gives us the tools and the mandate to change this picture.

There is an important and growing effort on the part of states, cities and private groups to save and use fine older architecture for office space. This month's Fortune magazine has an excellent article with photos on how to recycle buildings for office space. But perhaps the most relevant example comes from the State of Missouri. In St. Louis, the 9-story Wainwright Building, built in 1890-91 by Dankmar Adler and Louis H. Sullivan, and famed for its brick/terra cotta facade, was saved from demolition when the State of Missouri decided to restore the building as part of a state office building complex.

Local governments have also begun to act. In Seattle, the City is using some of the old turn of the century granite buildings in and around the restored Pioneer Square for city offices, thus contributing to the restoration, stability and liveliness of that area. The old City Hall in Boston has been modernized into beautiful and elegant private offices. All over the country where old buildings have been renewed, life around them has also been renewed and a pedestrian scale and diversity that gives the city a special character and excitement has been restored. My frank opinion is that if our older cities are saved, they will be saved more by this kind of thoughtful use of existing resources than by demolition and sweeping changes.

S. 865 not only recognizes the opportunity the Federal Government has to contribute to architectural and historic preservation; another section of the bill calls for enriching the spaces in and around the public buildings by a design that encourages pedestrians to move freely in, around and through the buildings, by providing courtyards, restaurants, food stores, shops, banks, theaters, lecture halls, meeting rooms and recreation facilities, not only for those who work in the building but for the convenience and enrichment of the general public, who after all pay the bill for the construction and maintenance of these structures. I might add there is also no reason why these functions and older buildings cannot be adapted to be accessible to the handicapped, whether employees or visitors.

Mixed use in office buildings is not a new idea, but it is an idea that requires the support of this legislation to encourage its widespread application in Federal buildings. In Canada and Sweden, the national governments have taken steps to include a variety of activities in their government buildings. In Nashville, Tennessee, the first five floors of a state office building now under construction will house separate music and drama theaters, a multipurpose rehearsal studio and a state museum—all open to the public. Above will be ten stories of offices for state agencies. This multi-use building will not only be economical to construct and maintain but it will tend to keep people in the currently underutilized downtown area after working hours. I believe the Federal Government can do much to engender the same sense of vitality by allowing a variety of uses in its own buildings. The legislation before you today would be a great help in starting us toward that goal.

With respect to the specific language of S. 865, we have two suggested changes which we believe the Committee should consider:

First, Section 2 of the bill should be revised to apply to leased space as well as purchased or federally constructed space. This would increase considerably the opportunity for adaptive use of older structures in cities.

Second, we believe the bill should encourage the consideration of alternatives using more than one older building or a mix of old and new, especially where the buildings are in close proximity. It should not be necessary to limit the survey to only buildings that can accommodate the entire Federal establishment in the city. Often creative use of groups of smaller buildings can accomplish the same purpose of consolidating agencies from scattered offices to a central location.

In closing, we support S. 865 and urge that it be enacted into law. The Office of Management and Budget has advised us that it has no objection to the submission of this report from the standpoint of the Administration's program.

Sincerely,

RUSSELL W. PETERSON,  
*Chairman.*

Senator BUCKLEY. The hearing is adjourned.

[Whereupon, at 12:10 p.m., the subcommittee recessed, to reconvene subject to the call of the Chair.]

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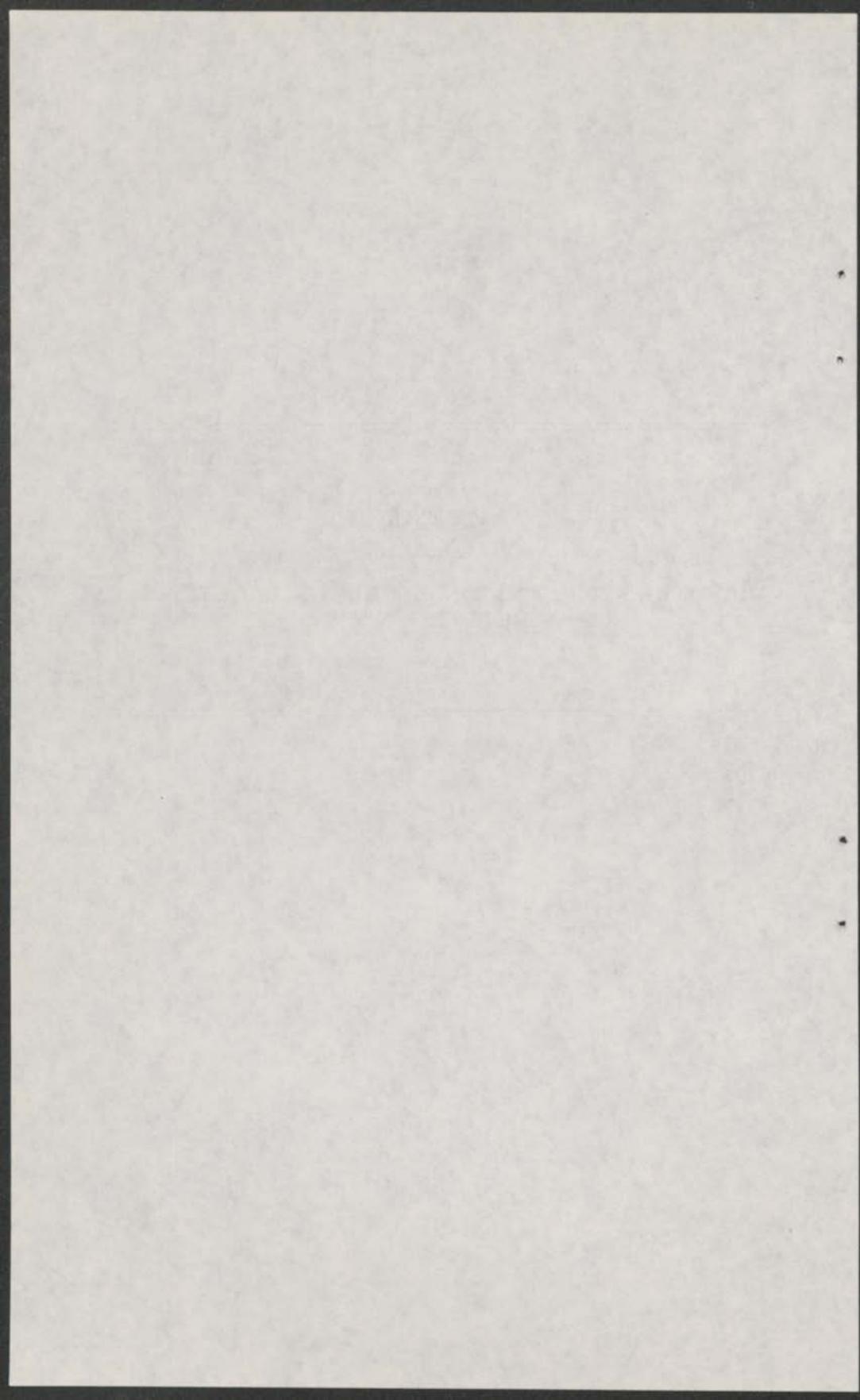
APPENDIX

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RESPONSES TO SENATOR BUCKLEY'S REQUEST FOR  
COMMENTS ON S. 865

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JAMES L. BUCKLEY  
NEW YORK

COMMITTEES  
PUBLIC WORKS  
INTERIOR AND RELATED AFFAIRS  
GENERAL BUSINESS

United States Senate

WASHINGTON, D.C. 20510

March 19, 1975

Dear

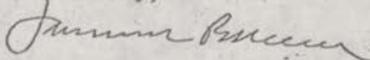
On February 27, 1975 I introduced the "Public Buildings Cooperative Use Act of 1975". This is legislation to encourage both "cooperative use" and "adaptive use" in the Federal office building program. I am enclosing a copy of the bill, as well as a copy of my floor statement explaining the intent of the legislation.

It would be most helpful to me to have your thoughts and suggestions on the bill. Do you believe that the idea is a sound and workable one? Do you have any suggestions for changes in the bill? Do you have any suggestions on buildings or cities where these concepts might be most effectively tried? Do you have any estimates on the savings, either in capital cost or energy use, from such a program?

I am hopeful that the Senate Committee on Public Works will hold a hearing on this bill within the next several weeks. With your permission, I shall ask that any response you are kind enough to provide be included as part of that hearing record.

My thanks for your cooperation.

Sincerely,



James L. Buckley

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(202) 785-8778

April 4, 1975

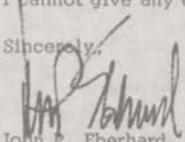
Senator James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for giving me an opportunity to comment on the "Public Buildings Cooperative Use Act of 1975." I am familiar with the report of the Federal Architectural Task Force, established under the National Endowment for the Arts, and I believe the idea of multiple use of Federal Buildings, as advocated in the report, to be a sound and workable one.

We will have to devote much more of our concerns at a nation to the redesign and rebuilding of our urban areas in the next few years. Federal Buildings and federal agencies tend to be located in the midst of our major urban areas. The Act can point the way to renewed use of our existing stock of buildings. We believe that 30 percent of the energy used in our existing building could be saved by redesign and careful modification of energy systems. A substantial part of this savings in larger buildings could come from more intensive utilization, carefully planned by architects. The dollars saved in revising buildings should also be substantial, but I cannot give any estimates that can be generalized.

Sincerely,



John P. Eberhard  
President

JPE/mc  
cc: Prima, Gara

April 3, 1975

Senator James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

Thank you very much for your letter of March 19. I'm sorry it has taken so long for me to respond to it.

I thought your proposal for the cooperative use and adaptive use of office buildings is excellent and I only wish that it would become the model for further programs to promote the mixed use of buildings. As you know, it is quite common for older buildings in Europe and elsewhere to contain apartments, offices, stores and commercial facilities all under the same roof and it is such a mixture of uses that makes so many buildings in European cities both lively and safe.

I'm sending you a copy of our March/April issue (1974) which was devoted almost entirely to the "recycling" of old buildings. It might come in handy. Please let me know what progress you make with your bill and tell me if there is anything I can do to be of help.

Sincerely yours,



Peter Blake

P.S. Our new address is 130 East 59th Street, New York, New York 10022.

## ARCHITECTURAL RECORD

1221 Avenue of the Americas  
New York, New York 10020  
Telephone 212/997-4565

WALTER F. WAGNER, JR., A.I.A.,  
Editor

March 27, 1975

Senator James L. Buckley  
United States Senate  
Washington, DC 20510

Dear Senator Buckley:

I have been aware for about ten days that you had introduced the Public Building Corporative Use Act with Senators Baker, Morgan, and Randolph. Before commenting I should "disqualify" myself by telling you that I was a member of Nancy Hanks' Federal Task Force on Guiding Principles for Federal Architecture. Its report, I am sure you know, strongly endorses the concept of mixed use in Federal buildings. I enclose a copy of a recent editorial, Guiding Principles for Federal architecture; Part 2. Or, why shouldn't the government live over the store? It details my enthusiastic belief in the concept developed in your bill (I also enclose an earlier editorial on the Task Force report outlining other Task Force ideas which I think are important).

So...Yes indeed I believe the idea is sound and workable. My only suggestion for changes in the bill relate to the restriction in Section 4, paragraph 16 encouraging lease of space on the ground floor only. I can envision a number of desirable private uses which might want space on two floors--for instance a store or restaurant with mezzanine or professional offices which might want semi-public space further up in the building. I can even envision the possibility of a restaurant on the top floors of Federal office buildings. In short, I suggest that you consider eliminating this restriction so that GSA officials will have the option of accepting proposals for leases on other than the ground floor when that seems desirable.

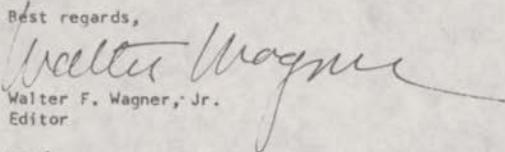
Where might these concepts be tried? I would suggest that the concept be tested as a possibility with every new Federal building in any city. I see no reason why this is a better idea in major cities as compared with smaller cities, or vice versa. Surely it ought to be tried in Washington--and the present plans for mixed use in the HLBB building look very exciting to me.

Senator Buckley  
Page 2  
March 27, 1975

I can't see any inherent energy or cost savings in this concept. But the rental of such premium space will obviously cut down the life cycle cost of the building, and that is a clear saving. More important is the addition to urban vitality that will result from your program. And I think it is the right image for the government to project--that its buildings are open encouraging public entry and activity.

I am just delighted you took the lead in sponsoring this bill. (Now how about sponsoring one encouraging government use of worthwhile older buildings.)

Best regards,



Walter F. Wagner, Jr.  
Editor

WFW/pv

enclosures



BANK OF AMERICA

A. R. ZIPP  
Executive Vice President

May 7, 1975

Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your letter of March 19 to Mr. Walter E. Hoadley, Executive Vice President, and for inviting our comments on the Public Buildings Cooperative Use Act of 1975. As Senior Administrative Officer, my responsibilities include the bank's real estate and construction activities; thus, we agreed it would be more appropriate for me to respond.

In addition to my own review, I invited comments from several associates; and our reaction is very positive in support of the dual objectives of the Bill. The concept of translating the government's needs for office space into a means for preserving architecturally and/or historically significant buildings and the idea of integrating Federal offices into the local community and encouraging private enterprise and public use are imaginative and would represent a refreshing departure from the traditional approach.

In our collective review several points emerged relating to the achievability of the objectives or to potential but not insurmountable problems in administration. Recognizing that most, if not all, have probably already been considered I nevertheless offer them with the hope that they will serve a constructive purpose.

- The twin goals relating to architectural/historical preservation and to the Federal Government/local community relationship are not necessarily inter-dependent and probably seldom coincidental. To have them intimately tied together could perhaps reduce the potential of each to be realized.

Honorable James L. Buckley

May 7, 1975

- The availability of suitable structures within an administrative area may prove to be a problem. And if there are few truly significant architectural/historic buildings it is vital that the use not impair their importance. This usually means very careful and possibly expensive integration of new uses to avoid impinging on the primary validity of the structures.
- Buildings, both of architectural/historic significance and of lesser significance (abandoned railway stations, warehouses, and similar structures) generally become economically feasible when other commercial projects in the same area are being undertaken simultaneously or where adjacent to commercial public areas that have been revitalized. In San Francisco, Ghirardelli Square and the Cannery are excellent examples.
- With respect to community integration (public use/private enterprise) it would probably be well to guard against overly optimistic expectations. As an example, it is doubtful that most citizens ever think of going to a public building except on business (aside from such buildings as the White House, Supreme Court, etc.). Also, the use generally of Federal office buildings only between the hours of 8:00 a.m. and 5:00 p.m. is a characteristic they share with nearly every commercial building in any large city.
- In general present building codes do not relate to nor encourage the remodeling of existing historical structures and in some instances because of provisions limiting improvements to a percentage of the value of the structure, do not permit extensive remodeling.

Often in the restoration of historical buildings, strict adherence to building codes has destroyed the integrity of the very items to be restored or protected; therefore, consideration must be given to alternative methods that provide a reasonable degree of safety to life and property.

In localities where the Federal Government uses its own guidelines the question of code enforcement authority may arise when spaces are leased to private enterprise. Possible conflicts between local codes, Federal Code guidelines, and the Federal Occupational Safety and Health Administration standards deserve careful attention.

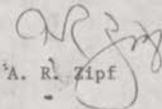
Honorable James L. Buckley

May 7, 1975

- The savings to be realized in renovating an existing structure rather than constructing a new building may be illusory. In reconstructing an existing building, what is really saved is generally the least expensive part of the building - the shell itself. In many instances the remaining shell imposes design constraints that impair the efficiency of the reconstructed building. Unit costs for renovation work generally exceed those for new work since the problems of scheduling and sequencing are much more complex. And added to this is the cost of bringing the building up to current codes or acceptable guidelines.
- If similar standards for lighting levels, building power, air conditioning requirements, etc. are applied to both new and renovated buildings, energy demands will be similar.

I hope these observations will be helpful. The Bill represents a fresh and positive approach and if there is any way we can be of assistance I hope you will let me know.

Sincerely,



A. R. Zipf

## UNIVERSITY OF CALIFORNIA, BERKELEY

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SANTA BARBARA • SANTA CRUZ

COLLEGE OF ENVIRONMENTAL DESIGN  
DEPARTMENT OF CITY AND REGIONAL PLANNING

BERKELEY, CALIFORNIA 94720

March 28, 1975

Senator James Buckley  
United States Senate  
Committee on Interim and Insular Affairs  
Washington, D.C. 20510

Dear Senator Buckley:

Thank you for the opportunity to comment on S. 865, the  
"Public Buildings Cooperative Use Act of 1975".

Basically I agree with what I understand to be the thrust  
and purpose of the bill. Here specifically, my comments  
are:

- . Section (1), p. 2, line 3: The problem here is that  
the Administrator of General Services, or his agents,  
if they wish to, can and will always find reasons why  
the use of an old building is not feasible or prudent.
- . Section (3), p. 2, line 12: Why this section? Here  
you begin to transgress into local responsibilities  
and desires.
- . Section (5) p. 2, line 22: Good.
- . Page 4, lines 4-12: Good.

I hope the above helps.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Allan B. Jacobs", with a stylized flourish at the end.

Allan B. Jacobs  
Professor of City & Regional Planning

ABJ:py

## THE OLIVER T. CARR COMPANY

April 4, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for giving me the opportunity to review the "Public Buildings Cooperative Use Act of 1975". I commend you for introducing this important bill. The following comments and suggestions are for your consideration:

1. On page 2 line 3, instead of "acquire", "lease or purchase" might be inserted to encourage the retention of suitable buildings of historical and architectural significance by the private sector for public use as well as by the public sector for its own use.
2. On page 2 line 12, I would suggest that specifics regarding the introduction of commercial and related facilities into or near GSA buildings should indicate that such facilities might be introduced to existing GSA buildings as well as buildings to be acquired, leased, or constructed in the future.

I believe that retaining buildings of historical or architectural significance and the introduction of commercial and related facilities into and around public buildings as well as encouraging public use of public buildings is a sound approach to providing the kind of amenities in the community necessary to serve the needs of both workers in public buildings and the neighborhood of which the public

The Honorable James L. Buckley

Page Two

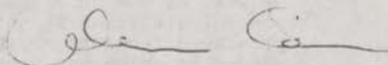
April 4, 1975

building should be a part and not isolated from because of its design or use. The so called "Keith's Theatre Building" in Washington, D. C. at the corner of 15th and G Streets, N. W., is an example of a building which might be leased from private owners after renovation or acquired by the Government for its occupancy.

I do not believe that it is possible to judge whether or not the capital outlay to either upgrade or operate older structures will be more or less expensive than building and operating new structures. Projects will have to be analyzed on an individual basis. I do believe that existing structures should be renovated and amenities added which will serve to enhance the community in which they are located and provide the kind of setting that will assist the Government in its efforts to attract and retain the services of highly qualified public servants if it is economically feasible to do so.

Please call or write if I can provide any more information to you or your committee.

Sincerely,



Oliver T. Carr, Jr.

OTC,Jr:bjw

CHLOETHIEL WOODARD SMITH & ASSOCIATED ARCHITECTS  
1056 THOMAS JEFFERSON STREET, N.W., WASHINGTON, D. C. 20007 202-336-7440

CHLOETHIEL WOODARD SMITH AIA  
FREDERIC A. WERT AIA  
RICHARD L. PASCHAL AIA  
CARL S. KOHLER AIA  
GENE RAY LEWIS AIA

CABLE ADDRESS: TENFIVEEIX

April 1, 1975

Senator James L. Buckley  
United States Senate  
Room 304  
Russell Senate Office Building  
Washington, D.C. 20510

Dear Senator Buckley:

I thank you for your March 19th letter, a copy of the "Public Buildings Cooperative Use Act of 1975" and your floor statement on the intent of the legislation. It is an exciting proposal and one that could contribute greatly to the humanization, rehabilitation and reuse of U.S. towns and cities. It is increasingly apparent that many factors, not the least being energy problems, will force us to reconsider our urbanization methods. This will require major changes in legislation framed in the past when continuing expansion into the countryside surrounding our towns and cities resulted in the abandonment and deterioration of usable and often distinguished older structures, as well as the under-use of urban land. Your proposed legislation is not only timely, but could provide directions for other actions which will be needed to solve our urban problems.

I have some question as to implementation. It appears to depend on an "administrator" to initiate and activate the program. I would think that a strong, independent Commission might be more effective in establishing a broad program, promoting it, and following its progress.

Senator James L. Buckley

April 1, 1975

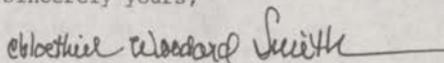
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Perhaps the proposed legislation could be broadened to stimulate a greater response by a Commission. Perhaps, instead of "To promote more efficient use of the nation's construction resources" as the first part of the bill, it should start with "people and their lives in cities" and should include a strong, clear statement of design principles. The definition of "design" is difficult, but it should be included as a reminder that it is as essential to the reused environment as to the new. Perhaps the designation of the National Trust only is too limiting -- the National Endowment for the Arts and many other public and private organizations are needed. And last -- specification of "the ground floor" in line 18 on page 4 could be unnecessarily limiting and seems unnecessary.

As for "buildings and cities where these concepts might be effectively tried", I would think a Commission should determine these after it has developed a complete program. And any estimates on cost savings are premature and should only be made by such a Commission. Savings are a goal but, until there is a clear program, I don't believe they can be quantified.

Again, my great appreciation for your inquiry and I hope that your very important and exciting bill will be passed.

Sincerely yours,



Chloethiel Woodard Smith

cws/hgk

P.S. You might be interested in the attached on "Growth Limits" -- the Club of Rome and Texas is an interesting combination.



Public Works  
Canada

Travaux publics  
Canada

Capital Region

Région de la Capitale

April 22, 1975

Mr. James L. Buckley  
United States Senate  
Washington, D.C.  
20510

Dear Mr. Buckley:

Thank you for your letters of March 19, 1975, to myself and Mr. R. Giroux, my Chief, Space Management and Marketing. I am pleased that we were able to be of some assistance to your group working on the Federal Architecture Project.

Details of our activity in this area were discussed in July 1974 with Mrs. Lois A. Craig, Staff Director, Guiding Principles for Federal Architecture and these are still current today.

I would like to reiterate that our Department of Public Works' policy is to attempt to bring vitality to our Federal complexes, as well as to avoid the sterilization of prime commercial areas in city core areas caused by the construction of Federal office buildings devoid of any public activity except that normally associated with the building occupancy itself during office hours. Within this broad policy, we have been actively studying markets in the various city cores and where demand exists for commercial activity, we are analyzing the economics of utilizing lower floor space in our buildings for such use.

In all of our new large office complexes, we carry out as part of our initial design studies, a marketing survey to determine the demand and viability of commercial activity in such complexes. If our study indicates a need for commercial retail facilities, we then strive to incorporate such activity within the lower floors of our buildings. As you can well understand, where we have the opportunity to carry out such studies in the pre-design stages of major complexes, the final result can be quite exciting.

It should be noted, however, that there are occasions where the Government buildings might be the catalyst for new development in a blighted area in the core of a city. Such is the case in many of our urban-renewal schemes. We have realised that in such developments the commercial space is unlikely to be economically viable, and not easily rented, for the first years and until such time as the neighborhood is developed. This does not prevent us from designing and constructing commercial space, which we might use for other purposes until such time as the demand for it arises.

With reference to the renovation or restoration of designated heritage buildings, or historically significant buildings, we do have many examples where we have chosen to renovate rather than demolish. A number of examples were discussed with Mrs. Craig during her visit. There are examples, of course, where a "highest and best use" study might indicate that economics would argue demolition and new construction rather than renovation. Restoration can, however, produce attractive office space while at the same time adding a sense of scale and charm to the city scene: this in addition to providing a link with history. I would suggest, however, that decisions in this area can neither be made all by "heart" nor all by "economics": a great deal of judgement is required.

While the above outlines our general philosophy and approach, you had asked a number of specific questions which I will attempt to answer. In relation to commercial activities, you were interested as to whether we had any suggestions as to which buildings or cities should receive attention in the first instance. I think that one would logically look first to major buildings in fairly large population centres. In the case of the retention and renovation of buildings of historic interest, this could apply to any centre and each case would have to be judged on its own merit.

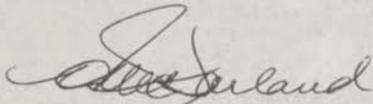
To come back to commercial activities, the introduction of such facilities into major Government complexes poses certain problems as I pointed out earlier. One of the concerns relates to the first years of occupancy. This applies particularly in an area that might be considered part of an overall redevelopment plan, and possibly an area that had very little commercial activity prior to redevelopment. Where commercial facilities are introduced into a Government building in an already viable commercial area, the same concerns in relation to a developing market of course would not apply to the same degree. A further caution related to earlier years would be to not attempt the opening of any commercial facilities in a Federal complex while construction might still be going on in a part of that complex. It is our general feeling that the idea of incorporating commercial areas into selected Government complexes is not only a viable one from the point of view of the greater overall benefit to the community, but also one that can be economically viable.

In the restoration/renovation of buildings of historic significance, and to be used for on-going use as office buildings or whatever, it is impossible to generalize in relation to "life costs". There are many factors to be considered. I referred earlier to "highest and best use studies". There are also heritage considerations. Both of these, of course, have to be related to cost and budget as we all know.

While we are enthusiastic about what we are attempting to do, we really do not have that many years of experience behind us in these areas to enable us to be more specific in relation to some of the questions you had posed. Nonetheless, we feel that the overall objectives are valid and hold out a great deal of promise.

I hope that these thoughts prove to be of some help.

Yours very truly,

A handwritten signature in cursive script, appearing to read "H.D. McFarland".

H.D. McFarland  
Regional Director  
Capital Region



CENTER FOR THE VISUAL ENVIRONMENT

4525 New Hampshire Avenue, N.W., Washington, D.C. 20036 (202) 797-4403

June 1, 1975

Senator James L. Buckley  
Committee on Public Works  
United States Senate  
Washington, D.C.

Dear Senator Buckley:

Thank you for your letter regarding the Public Buildings Cooperative Use Act of 1975. We appreciate this opportunity to comment on this important bill.

The Center for the Visual Environment is a non-profit organization, funded through Environmental Action Foundation, which assists people in their direct efforts to protect and enhance their physical surroundings. The Center serves a national constituency, consisting largely of citizen groups and individuals.

The Center represents the belief that the physical aspects of a neighborhood or city reflect the health and vitality of the citizens, and the nature of the city itself. We are committed to maintaining and improving neighborhoods, and working for visual elements which are not only pleasing but reflective of the residents. The role of diversity in maintaining the life and sense of definition of an area cannot be over-stated. Unfortunately, planning and construction trends of the past decade have been away from diversity and toward single-function land use designations and single-function buildings. We are now seeing with clarity how destructive these trends have been. The Federal government's policies in construction, leasing and renting have helped create the anonymous, dead areas which now characterize many city locations. Accordingly, the Federal government is in a position to make a crucial difference in changing this scene for the better. The Center is delighted at the whole new direction for Federal policy which S. 865 represents.

There are several specific comments we wish to make.

1. The key to effective implementation of this bill, clearly, is the bureaucratic interpretation of "feasible and prudent" alternatives. Hopefully, GSA will assume the positive attitude of the bill's sponsors and not settle on a narrow, overly-quantified method for making these decisions.

For example, many citizen groups who are involved in efforts to save buildings from demolition are presented with a finding by an engineering consultant that the building is not sound, and that modernization would be too costly to consider. These studies are prepared at the request of the agency which wishes to destroy the property. Our experience has been that if time allows a second survey to be made, by a firm with some experience in rehabilitation work, the results are generally quite different. This reflects not only the subconscious desire of consultants to please the client; it shows the simple difference experience makes in working with older structures.

We strongly urge that GSA develop sympathetic criteria for structural analysis of older buildings, utilizing people with knowledge of this work. We also recommend that GSA examine and use a study conducted by the City of Seattle, in cooperation with the National Trust, showing how older buildings can be brought to building code requirements without enormous expense or loss of their integrity.

2. The surveys for significant buildings required by the bill must be conducted in a thorough and careful manner. We urge that local citizen groups (preservation societies and others) be used, or that these groups at least be allowed to comment on available buildings. Local residents have the best feel for buildings which have community significance, for real traffic patterns, and for locations where rehabilitation of a property or designation for mixed-use might truly benefit an area.

3. Similarly, we strongly recommend that the community be allowed to participate in the decision-making process for the selection of commercial rental clients. Federal buildings are paid for by the public, and responsiveness to the community must go beyond simple market economics. Selection of commercial clients will not be an easy process, but we believe the desires and needs of the community should be as valid a criteria for selection as any other. A super market, for instance, is often a strong need of city residents, and would serve the day-time working population of a building as well.

4. It is particularly important that small older buildings, of the type often described as the vernacular architecture of an area, be utilized. Placing Federal offices in areas where their physical isolation is reduced can only be an improvement over the present situation. The more small structures are used (and there are certainly many Federal offices which do not need to be part of a mammoth labyrinth to function,) and the more mixed-uses can be adopted, the more the growing Federal paranoia and exclusiveness will be reduced. The estrangement of government from people is clearly a major problem of our time, and it applies at all levels. Let the Federal government take the leadership in changing this attitude, by making its offices, information and personnel truly available.

Center for the Visual Environment  
Page 3

5. The criteria for selecting Federal users for prime space contained in the legislation, those "requiring regular contact with members of the public," should also be used and extended for selecting commercial rental clients. Facilities with long open hours should have priority over those which close early or often. We particularly recommend the inclusion of restaurants wherever possible.

6. Many new Federal buildings are generating large open areas. Some are popular and some are not. We wish to bring to the attention of the Committee a study now underway in New York City evaluating plazas and other urban open spaces. The author, well-known writer and scholar William H. Whyte, describes in the attached article simple changes which can convert barren, dirty or dangerous expanses of concrete into attractive and useable areas for people. We recommend that GSA be directed to study this report and incorporate its common-sense conclusions into present and future Federal plaza areas.

The Center works with many people across the country who are part of an effort to appreciate, protect and enhance the physical and social aspects of our cities. Cities are still the heart of our civilization and the magnets for our population. We welcome this opportunity to share our views with the Committee, and look forward to a changed and positive approach by the Federal government toward cities as a result of this bill.

Sincerely yours,



Nancy Carson Shirk  
Director

DOWNTOWN BROOKLYN DEVELOPMENT ASSOCIATION, INC., 26 COURT STREET, BROOKLYN, NEW YORK 11242. TELEPHONE (212) 522-7200

March 25, 1975

The Hon. James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your letter of March 19 and the accompanying material on your proposed "Public Buildings Cooperative Use Act of 1975."

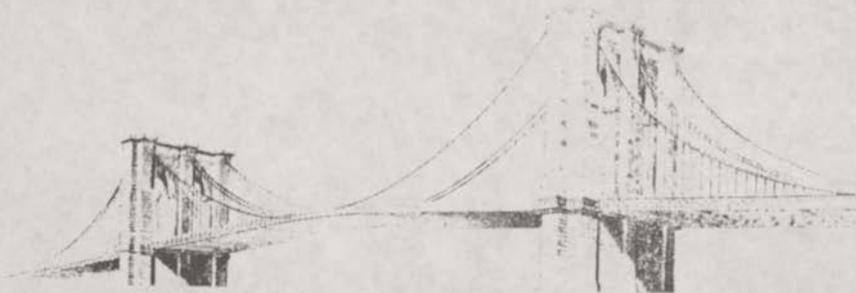
The concept is enormously important, I think. Having spent last Friday in Albany and the previous Friday in Washington, I've been especially depressed at a fundamental inequity in our society--which is that the capitals seem to have untold billions to spend in developing incredible and sterile architectural monuments while a great and privately productive place like Downtown Brooklyn finds it almost impossible to find either private or public capital to build anything. If you could somehow develop a comparison as the development-cost-per-person benefited ( or even per-person-able-ever-to-see-the-building), the difference between Washington and Brooklyn, or between Albany and Brooklyn must be 100-to-one.

We are taxing the productive sector of our society, especially in major cities, to a point where its collapse must be considered a real possibility. If monument-building is not the chief reason for the great burden, it is at least the most visible, and it is rankling indeed.

With all our chauvinistic hopes for progress in Downtown Brooklyn, we do not feel we need another government building. What we do need is exactly what you propose--that the office space needs of the national, state, city and borough governments be utilized intelligently to stimulate mixed-use private construction and recycling efforts. As you indicate in your floor statement, New York City has begun to do some of this, and it has been beneficial to the economy of our area.

I've no way of providing estimates as to savings that might result from your proposal, but also no doubt that they would be enormous.

As to buildings and cities where these concepts might be most effectively tried, I've two suggestions: 1) Work with us in Downtown Brooklyn as it relates to Federal space needs in the New York



The Hon. James L. Buckley

March 25, 1975

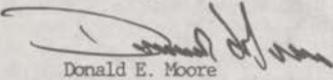
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metropolitan area; 2) Ask the approximately 100 members, in as many cities, of the International Downtown Executives Association--of which I am president-elect--for their ideas in each locality.

The most recent issue of our newsletter, enclosed, has an "editorial" on page 2 which you may find interesting and somewhat connected with the matter you raise.

Please let me know if we may provide anything more helpful.

Sincerely,



Donald E. Moore  
President

# DOWNTOWN PROGRESS

National Capital Downtown Committee, Inc. 521-12th Street, N.W. Washington D.C. 20004 • 393-8387

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Foster Shannon  
John S. Prescott, Jr.  
Paul E. Reichardt  
Frank A. Rich  
William Rubinowitz  
Woodrow W. Russell  
Foster Shannon  
Douglas H. Smith  
Jeffrey G. Spingarn  
John W. Stantien  
Richard E. Stein  
John W. Thompson, Jr.  
W. Reid Thompson  
Thomas M. Walsh  
Larry C. Williams, Sr.  
Burt M. Winstead  
J. Herman Zahn

April 3, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your recent letter inviting the comments of Downtown Progress on S. 865, the "Public Buildings Cooperative Use Act of 1975." We are pleased to offer this letter for the record at the hearing that you indicate should be scheduled shortly.

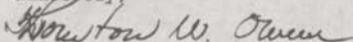
We are delighted to support this legislation since we have been working for more than twelve years to encourage the use of ground floor space in public buildings for commercial and related activities for the very reasons you state. As you know, Downtown Progress is also active in support of appropriate historical and architectural preservation in the square mile of Downtown Washington between The White House and The Capitol. We have played a major role in Ford's Theatre restoration, preservation of Adas Israel Synagogue, and preservation of the landmark Union Station for its conversion to National Visitor Center use. We are now working with others to help advance prospects for the reopening of the Willard Hotel and for the creative reuse of the Old Post Office Building.

S. 865 encourages "cooperative use" and "adaptive use" in the Federal office building program. This should do much to advance prospects for the creative reuse of buildings such as the Old Post Office. As you have pointed out in introducing the bill, this "... would bring new life, new activity, and new vitality to the blocks around . . . Federal office building(s)." This "better neighbor" approach on the part of the Federal Government could help immensely in carrying out downtown revitalization programs in many cities, including the Nation's Capital. A host of public initiatives have been taken to accomplish

Downtown revitalization here, including the planning for Pennsylvania Avenue, Downtown redevelopment actions, and METRO. The success of these initiatives is important nationally as well as locally for many reasons including the fact that Washington is regarded as a model for the country. S. 865 would provide additional, positive, reinforcement to the thrust of these public efforts. With S. 865 enacted, practicable ways could be explored for incorporating compatible uses, attractions, and activities in buildings within the Federal Triangle, for example, in order that the millions of visitors to Washington, D. C., annually can be better accommodated and served and can have a more enjoyable and educational experience here. It may be still possible to incorporate active uses along the ground floor frontages of the J. Edgar Hoover Building also, substantially adding to its vitality and that of Downtown. Our earlier efforts to accomplish this in the design, prior to construction, were not successful.

The concepts embodied in S. 865 appear to be sound and workable. This legislation could do much to advance downtown revitalization efforts here and elsewhere. Downtown Progress heartily supports the bill and urges its prompt enactment and implementation.

Sincerely,



Thornton W. Owen  
Chairman of the Board

DUBIN - MINDELL - BLOOME  
ASSOCIATES, P.C.  
CONSULTING ENGINEERS

FRED S. DUBIN, P.E. • HAROLD L. MINDELL, P.E. • SELWYN BLOOME, P.E.

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212 - 868-9700  
FRED S. DUBIN ASSOC.  
INTERNATIONAL  
VIALE TIZIANO 3  
ROME, ITALY  
TEL. 301-282

REPLY TO  
42 WEST 39TH STREET  
NEW YORK, N.Y. 10018

March 24, 1975

Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

In your letter of March 19, 1975 you ask if I would offer an opinion on Bill S.865 "Public Buildings Cooperative Use Act of 1975". I would like to offer the following opinions which are my own, based on my personal knowledge, and emphasize that these do not necessarily reflect the opinions of the American Consulting Engineers Council for which I am the Chairman of the Energy Committee.

I heartily endorse the idea of multi-use buildings for the following reasons:

1. The capital costs of building and mechanical and electrical systems are lower.
2. Energy consumption is less in the buildings.
3. Energy consumption for transportation is reduced when facilities are combined. It has been our experience that combined facilities may reduce the initial size and capital costs of mechanical equipments by 15 to 20% as compared to housing the same functions in dispersed structures because the multi-use buildings take advantage of diversity in sizing equipment.

Consumption of energy in the multi-use building will generally be less than separate structures for the same functions, due to a great reduction in building area, i.e. same corridor space can supply the diversified functions within one building; whereas the corridorspace would have to be duplicated in separate structures, and the reduced perimeter area, in most climatic zones of the country, will result in energy savings for the multi-use buildings.

(Cont'd. page 2)

By renovating existing buildings, rather than constructing new structures, considerable less energy will be required in the production and distribution of construction materials.

While the energy required for construction materials is generally less than 1/20 of the energy required to operate the building, it is still a considerable quantity and must be reckoned with in view of the energy situation as it exists today and in the foreseeable future.

In our energy studies we have found that buildings of later vintage than 1950, generally consume less energy than those built in the last decade.

While some of the difference in energy usage can be contributed to lower levels of lighting and less air-conditioning, after making allowance for these differences, the energy used for old buildings is still less than the newer ones because of the thicker walls which provide thermal mass and smaller windows.

We are finding that the lower levels of lighting and a reduced amount of air-conditioning are often adequate and are unlikely to be raised to the same thoughtless levels that have been characteristic of buildings design within the last 10 to 15 years.

I have recently completed a study and report for the Federal Energy Administration consisting of two volumes, each about 350 pages long, devoted to energy conservation for existing buildings. These reports document our findings that, it is possible to conserve almost as much energy in the operation of the heating, ventilating, air-conditioning, lighting and power systems by retrofitting an existing building, as it is in the operation of these systems in a new building designed for energy conservation, especially when extensive modifications to the interior of the existing building are required for other functional use.

The interior of buildings can be retrofitted without destroying or altering the exterior facades, so that buildings of historic and architectural significance, will not be adversely affected.

I would urge that any building which the Federal Government retrofits for its' own or co-operative use, that an energy budget be established which limits the number of BTU's per

Honorable James L. Buckley

-3-

3/24/75

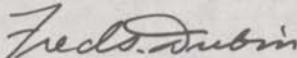
square foot per year it consumes for all services. There is sufficient data available now to promulgate energy budgets and interim standards for design and construction to attain the energy budget.

I would respectfully suggest that demonstration buildings be selected in six distinct climatic zones within the United States to develop and test the concepts and philosophy expressed in the Bill S.865, and in accordance with our suggestions for energy budgets.

I appreciate your asking me for opinions on the Bill.

Yours sincerely,

DUBIN-MINDELL-BLOOME ASSOCIATES, P.C.



Fred S. Dubin, P.E.  
President

FSD/bb.

**First National Bank in St. Louis**

Broadway, Locust, Olive, Sixth  
St. Louis, MO 63166

Clarence C. Barksdale  
President  
314/342 6201

First Union  
Group

March 28, 1975

Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

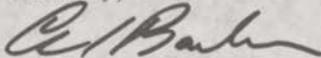
Dear Senator:

In response to your letter of March 19, 1975, I want to thank you for sending to me a copy of your "Public Buildings Cooperative Act of 1975" and requesting my reaction to that bill.

While I am not eminently conversant with the intricacies of our Federal Government's present policy toward creating needed facilities, I am impressed with your suggestion that, wherever possible, we attempt to make use of existing office space and "recycle" existing buildings into new federal offices, where appropriate. Conceptually, I am in agreement with your approach to this problem, and I commend you for your efforts to avoid the creation of expensive, and sometimes inefficient, new monumental types of structures.

I hope that this will be helpful in your efforts to promote approval of your bill when hearings are held before the Senate Committee on Public Works.

Sincerely,



Clarence C. Barksdale

CCB:pc

## Frederick Gutheim AIP

1750 Pennsylvania Avenue NW Washington DC 20006 Telephone: (202) 298-7780

Professional Memberships: AMERICAN INSTITUTE OF PLANNERS HON. AMERICAN INSTITUTE OF ARCHITECTS AMERICAN ASSOCIATION OF MUSEUMS  
 SOCIETY OF ARCHITECTURAL HISTORIANS NATIONAL TRUST FOR HISTORIC PRESERVATION

25 March 1975

The Honorable James L. Buckley  
 United States Senate  
 304 Russell Office Building  
 Washington, D.C. 20510

Dear Senator Buckley:

Thank you for sending me S. 865 and requesting comment. I have long been interested in this subject.

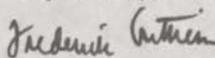
The priority given historic and other existing buildings is a welcome recognition of both the need to enliven the public working environment and to achieve preservation objectives, particularly in the case of the larger structures such as public buildings, railroad depots, etc. It may even save money. This category of building should be broad enough to include some important non-architectural structures that are usually considered works of engineering; and the legislation should consider the possibility of alteration or additions to existing structures, and some design problems associated with such changes. This suggests amendments to Sec. 2, (1).

The objective of diversified use is also a welcome authorization but requires more detailed discussion and provision. In particular, if one recognizes present security arrangements (and I believe these are the main bar to public use of public buildings) the more practicable measures toward enlivening the public working environment will be (a) after hours uses; (b) services to occupants of the building, or users of public services; (c) specially organized events, such as concerts, lectures, etc. It should also be recognized that the principal areas used will not be the Federal office space proper but lobbies, corridors and other public spaces, outside space (viz Sec. 4 (17)). Perhaps it would be worth specifying the objective of these authorizations as being diversified use, a livelier social atmosphere, etc.

Sec. 3 (3)(c) requires consultation with the National Trust for Historic Preservation. The Administrator should further be required to consult the National Register of Historic Places and State registers or inventories of historic buildings. I hope that previous experience in this context has been examined to determine its effectiveness and any associated problems.

In conclusion, I feel the greatest benefits will come from the use of Federal space after working hours, and by the ground floor commercial uses and/or concessions. These are matters of buildings management as well as of buildings design.

Very sincerely,



Frederick Gutheim

**Mitchell/Giurgola Associates Architects**1315 Arch Street Philadelphia Pennsylvania 19107  
215/561-1600Ehrman B. Mitchell, Jr. FAIA  
Ronaldo Giurgola AIA

Fred L. Foote AIA

Rollin R. La France AIA

John G. Lawson AIA

G. Daniel Perry AIA

Peter W. Parsons

7 April 1975

The Honorable James L. Buckley  
 United States Senator  
 304 Russell Senate Office Building  
 Washington, D. C. 20510

Dear Senator Buckley:

Thank you for writing to me concerning your proposed legislation, the "Public Buildings Cooperative Act", Senate Bill S. 865. This subject is of high interest to me.

The provision for "cooperative use", encouraging outside interests to participate with the Government as described in your presentation to the Senate is indeed an innovative idea. Your proposal could have all the beneficial effects you foresee and enhance the possibilities for "adaptive use" of old buildings which have ground floor space that originally served these purposes.

As a member of the National Board of Directors of the American Institute of Architects, I am familiar with the AIA's extensive program in the area of preservation of historic and architecturally significant buildings across the country. Their resources could be most helpful to you in developing substantive material pertinent to your Bill. In this regard, I am taking the liberty of introducing your request for thoughts and suggestions to the President of the Institute, Mr. William B. Marshall, FAIA, 1735 New York Avenue, N. W., Washington, D. C. 20006; telephone: 202/785-7300.

In addressing your specific questions, I comment as follows:

1. Is the idea a sound and workable one? Yes. There are many fine examples of restoration of significant or historic buildings that have been adapted for Municipal or State Government use that would support this conclusion. The National Park Service has pioneered in this field for the Federal Government over the past several decades achieving considerable success in Philadelphia.

**Mitchell/Giurgola Associates Architects**

1316 Arch Street Philadelphia Pennsylvania 19107

The Honorable James L. Buckley

7 April 1975

page two

2. Suggested changes to the Bill. I find it difficult to suggest changes to your Bill. It is succinct and adequate from a layperson's view.
3. Suggestions on buildings or cities where these concepts might be most effectively tried. The broadest source of information concerning buildings and cities suitable for trial of your concepts is the American Institute of Architects. The AIA has a nationwide network of architects whose principal concern is the preservation of historic and architecturally significant buildings. I am sure this resource could be most valuable in assisting you to determine those cities and specific buildings that would be most suitable for your purposes.
4. Estimates on savings, either in capital cost or energy use. Savings in capital costs or energy use are difficult to generalize principally because each situation will have its particular aspects which will bear on this issue. However, I think one could suggest that recycling costs would tend to be less expensive than building anew. The range could be from 10% to 25% depending on circumstances. It should be anticipated that not all buildings will yield a savings as suggested. Concerning conservation of energy for operating such buildings, I'm encouraged to believe this is possible in recycled old buildings because they generally have less glass area and thicker enclosing walls. Rehabilitation techniques can be employed to improve their energy efficiency such as replacing defective windows, insulating walls and roof areas, and many other like measures.

Our firm is currently engaged in restoring and preparing the Wainwright Building in St. Louis, Missouri for general offices for the State of Missouri. We are anticipating a savings in capital costs, and we are employing techniques to conserve energy.

I would like to take this opportunity to commend you for initiating this important concept and transforming it into positive action. You have my full support for this measure, and I shall urge my colleagues to join with me in this. I will bring this to the attention of the American Institute of Architects. They can offer you much assistance in carrying out this legislation.

**Mitchell/Giurgola Associates Architects**

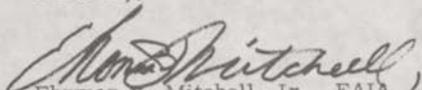
1316 Arch Street Philadelphia Pennsylvania 19107

The Honorable James L. Buckley  
7 April 1975  
page three

Thank you for your invitation to comment on Senate Bill S. 865.

My best wishes for its successful enactment.

Sincerely,



Ehrman B. Mitchell, Jr., FAIA

cah

cc: William B. Marshall, FAIA  
President, American Institute of Architects

William B. Slayton, Hon. AIA  
Executive Vice President  
American Institute of Architects  
1735 New York Avenue, N. W.  
Washington, D. C. 20006

# University of Illinois at Urbana-Champaign

COLLEGE OF LAW · 209 LAW BUILDING · CHAMPAIGN, ILLINOIS 61820 · (217) 333-0931

March 25, 1975

Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

It is a pleasure to respond to your request for comments on Senate Bill 865. Despite the bill's obvious advantages regarding such matters as energy conservation, employment, etc., I will restrict my comments to the bill's potentialities for historic preservation.

With the assistance of the National Trust for Historic Preservation and the United States Department of Housing and Urban Renewal, I completed last May a study, Space Adrift: Landmark Preservation and the Marketplace, a copy of which is enclosed. A major concern of the study was to profile the comparative characteristics for downtown office and commercial use of landmarks and of their typical modern replacements. Chapter III of Space Adrift leaves little doubt that in Chicago's Central Business District (the area examined in the study) the use of landmark structures for contemporary office and commercial needs is entirely feasible. From the perspectives of on-site amenity considerations and of contribution to the city's urban design and environmental fabric, in fact, landmarks are decidedly superior to their glass and steel competitors. The study reports, moreover, that landmarks are not economic "white elephants", as often uncritically asserted by those who misguidedly identify "progress" with newer and bigger buildings, but that the structures earn a reasonable return on invested equity. It is obvious that firm governmental commitments to lease or otherwise acquire space in these buildings--as called for in the bill--can only enhance their competitive position, thereby providing an invaluable assist to their preservation similar to that afforded to St. Louis' Wainwright Building by Missouri Governor Bond's decision to locate state office functions in it.

In short, by directing the federal government to consider historic and other existing buildings in assessing its space needs, the bill will surely contribute to the maintenance of vital, truly exciting American cities and protect cherished landmarks that would otherwise be lost to the forces of an indiscriminate marketplace.

I have only one major observation regarding the bill's language. It seems to me that Section 2(a)(1) gives insufficient attention to buildings listed on the National Register of Historic Places and, perhaps, those formally designated as landmarks by state and local governments as well. As presently drafted, the section empowers the Administrator to decline to utilize space in these buildings if "use of such space would not prove feasible and prudent compared with available alternatives." The quoted language is unduly vague, inviting circumvention by those who--like most real estate management firms and organizations--assume that differences in space lay-out, utilities and other "efficiency factors" between older and modern buildings presumptively

Honorable James L. Buckley  
March 25, 1975

Page 2

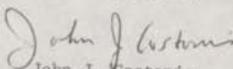
establish that choice of the older over the newer is not "feasible" or "prudent." In fact, many landmarks, e.g., Old Boston City Hall or Chicago's Marquette Building, are quite competitive with modern structures on a straight efficiency basis.

But what of the case of a National Register property or designated landmark that is not? As drafted, the bill would permit these to be passed over. I would urge that the bill be tightened to provide that for such buildings the following factors be taken into account in assessing the "prudence" or "feasibility" of use:

1. the possibility through renovation of making these structures reasonably competitive on an efficiency basis even if the costs of renovation would exceed those that the private sector would normally undertake acting exclusively for profit considerations; or
2. the extent to which the building's architectural or historic distinction and its urban design contributions to its surrounding area and its city merit protection notwithstanding the building's rating on a straight "efficiency" basis.

These changes would stress that government's stewardship of buildings that contribute mightily to the nation's heritage entails responsibilities of a wholly different order from those of private entrepreneurs whose stewardship is governed by profit considerations. This view is recognized and implemented in virtually every other country that I have visited. With our Bicentennial only one year away, Senate Bill 865 promises to correct an imbalance that has gravely hindered preservation efforts in the United States.

Sincerely yours,

  
John J. Costonis  
Professor of Law

JJC:ds

Enclosure

Johnson / Burgee Architects

375 Park Avenue  
New York, NY 10022  
212/751-7440

March 27, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

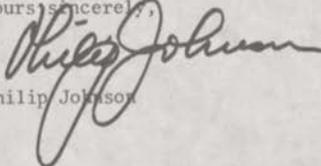
My dear Senator Buckley:

I have read your bill called "Public Buildings Cooperative Use Act of 1975." I have no particular comment except enthusiastic endorsement.

It is very pleasing to an architect that our lawmakers are so aware of trends in architectural and urban design thinking.

Congratulations and good luck!

Yours sincerely,



Philip Johnson

PJ:jg

LANDMARKS  
ASSOCIATION  
OF  
CENTRAL NY

April 2, 1975

Senator James Buckley  
5323 Dirksen Senate Office Building  
Washington, D. C. 20510

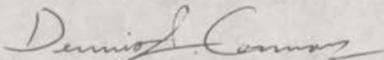
Dear Senator Buckley:

Your recent introduction of legislation in Congress to help the federal government recycle valuable older buildings instead of constantly erecting "concrete monoliths" is another welcomed sign that historic preservation should be, and is, becoming accepted practice at all levels.

The Landmarks Association is the main vehicle for historic preservation activities in the Central New York area. Both our membership and the Central NY community would be extremely interested to learn more about why you, as a U. S. Senator, believe in the importance of preserving the best of our historic environment. A marvelous opportunity presents itself, and we would be highly honored if you would be willing to do this at our Annual Meeting, before at least part of the constantly growing "preservation constituency" in New York State. This will be the evening of May 15 in Syracuse.

It is generally recognized that New York State leads the nation in organized preservation activity, and we are all pleased to see one of our senators taking a leadership role.

Sincerely yours,



Dennis J. Connors,  
Executive Director

enc.

678 W. Onondaga St./Syracuse, NY 13204



## Landmarks Preservation Service

407 South Dearborn Street · Chicago, Il. 60605 · 312-922-1742

April 2, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Mr. Buckley:

I was pleased to receive your letter of March 19 and have examined Senate Bill 865 introduced by you, as well as the text of your floor statement.

As one who is deeply involved in the problems of central city vitality and the economic reuse of older buildings in conjunction with new development, I applaud the bill and the floor statement most heartily.

The idea is both sound and workable, and Chicago would offer an exciting arena for testing it. In downtown Chicago we have buildings ideally situated and in close proximity to the Federal Center. Furthermore, they have recognized national and international significance which was officially documented by the U.S. Department of the Interior in its March 1973 report on the Chicago School of Architecture. (I will enclose a condensation of that report in two parts. The full report is available from the U.S. Government Printing Office, stock No. I29.2:C43.)

I also will enclose a copy of CHICAGO'S LANDMARK STRUCTURES: AN INVENTORY in which I have indicated the location of the Federal Center complex on the map on page 3. I would particularly recommend to your consideration the buildings listed in that document as buildings C40, C41, C42, C43 and C45 which are described on pages 11 through 13.

We have not been successful in interesting the General Services Administration in considering nationally important landmark structures in the City of Chicago for federal office space usage. Indeed, we have encountered similar difficulties with other agencies of government whose mandate for the use of funds does not include the purposes treated in your Bill.

The Honorable James L. Buckley  
April 2, 1975  
Page Two

The placement of Federal offices and the utilization of physical facilities has an enormous impact on the character and vitality of affected communities, but many aspects of that impact is simply ignored.

Your Bill would be most helpful in rectifying an extremely serious urban problem, especially in central city locations which are fighting to retain their vitality.

I would observe that merely permitting GSA to embark on such projects when "desired" by local people and GSA may be insufficient since that agency and the local officials it will deal with have not evidenced any present orientation to the problems you address.

Now some comments on specific provisions of the Bill:

Page 2, line 12: Your encouragement of commercial use is important and desirable. A major problem in the reuse of older buildings for preservation or other purposes is to make them self sustaining. The usual focus on cultural and civic activities use often produces either an endless drain on municipal finance or an unrealizable project. Commercial use is self sustaining.

Page 4, line 23: Requiring that space be leased at prevailing commercial rates on the ground floor of new buildings often would preclude uses which contribute most to the activity and amenity of the area. In Chicago, older buildings provide facilities for restaurants, retail shopping, and service functions which contribute to activity at street level and to servicing those who shop and utilize office space in the Loop. New construction often requires a rent structure which forces such enterprises out. I therefore suggest your consideration of an exception to the prevailing commercial rate requirement where a lower rate is necessary or desirable to generate commercial or non-commercial uses which will enhance the social or economic environment within or surrounding Federal office buildings.

Page 3, line 9: GSA should be required to consult with community leaders outside government. "Such . . . leaders . . . as he thinks appropriate" is simply not sufficient. Public officials are busy. They will touch base with one or two key municipal officers, and often will ignore "community leaders" for a variety of reasons. The Administrator should be required to consult with at least three community leaders engaged in activity or involved with organizations whose interests may be affected in the execution of his duties under Subsection (a) of the Section. For example, where our organization is engaged in efforts to preserve landmark commercial buildings in downtown Chicago, and GSA is proposing uses for downtown Chicago, our interests would be affected and we should be consulted.

The Honorable James L. Buckley  
April 2, 1975  
Page Three

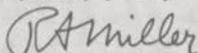
Page 6, lines 19 through 21: The provision which does not limit historical or architectural significance to National Register Buildings is wise because registration is a complex process and it simply is not possible to get everything onto the National Register in timely fashion. We have repeatedly encountered specific difficulties because an opportunity or problem arose which could not be anticipated and the building involved had not yet been nominated.

I and my colleagues would be most interested to discuss this legislation and its implementation with you, your staff, and any members of the Committee on Public Works.

Because the senators from Illinois have taken a particular interest in our work, I am taking the liberty of forwarding to them a copy of this letter.

Our sincere thanks for your interest and consideration in addressing this problem.

Very truly yours,



Richard A. Miller  
President and General Counsel

RAM:sg  
Encls.

cc (w/encls):

The Honorable Adlai Stevenson  
The Honorable Charles Percy



WILLIAM J. WHITE  
EXECUTIVE DIRECTOR

THE COMMONWEALTH OF MASSACHUSETTS  
MASSACHUSETTS HOUSING FINANCE AGENCY  
OLD CITY HALL • 45 SCHOOL STREET  
BOSTON, MASSACHUSETTS 02108 • (617) 723-9770

April 9, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your letter of March 19 along with the copy of S. 865. I think this is a very exciting bill, and I believe very strongly that so many of our beautiful old buildings have new life, and in many cases are looking for a user.

Our Agency has been encouraging the rehabilitation and recycling of many of our fine old buildings in this state, and our offices are in a building that is in the National Register and has been restored. It is used as an office building with some commercial facilities such as a bank and a restaurant.

I would be delighted to either send a statement when the Committee holds its hearings or I would be pleased to testify before the Committee. I am enclosing some material which might be of interest to you.

Sincerely,

A handwritten signature in cursive script, appearing to read "William J. White".

William J. White

WWJ/lb



Telephone (202) 393-4332

## National Urban League, Inc.

Washington Bureau

Ronald H. Brown, Director

425 Thirteenth Street, N.W.

Suite 515

Washington, D.C. 20004

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 JAMES A. LINEN  
 HENRY STEEGER

April 18, 1975

The Honorable James L. Buckley  
 United States Senate  
 304 Russell Senate Office Bldg.  
 Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your letter of March 19, 1975. Your concerns about more efficient use of the nation's construction resources and the preservation of buildings of historic or architectural significance within and surrounding federal office buildings is shared by the National Urban League. Clearly, this is a neglected problem and the solution will require the kinds of efforts your bill seeks.

On behalf of the National Urban League and myself, let me commend you for introducing S. 865.

Sincerely,

Ronald H. BROWN  
 Director

RHB/bj

Contributions to the National Urban League are tax deductible.

# National Trust for Historic Preservation

740-745 JACKSON PLACE, N. W. WASHINGTON, D. C. 20006 (202) 382-3304



March 28, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

Thank you for your letter of March 19, 1975, asking for our thoughts and suggestions on the "Public Buildings Cooperative Use Act of 1975" which you introduced as S. 865 on February 27, 1975.

By letter dated March 25, 1975, we responded to Public Works Committee Chairman Randolph's request of March 6, 1975, for our comments on the bill. You will note from the copy of our response, forwarded herewith for your information, that the National Trust fully supports all of the provisions of the bill. In our particular area of interest we believe, further, that enactment of the measure would favorably impact the preservation of buildings significant to American history and culture throughout the nation.

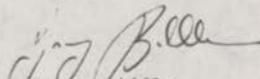
It should not only reverse the Federal trend of abandoning its own historic structures, but also bring about use of increasing numbers of other historic buildings not presently owned by the Federal government.

We have made no survey to determine the number or location of such buildings potentially suitable for Federal use, with or without renovation and restoration. We believe, however, that they exist in almost every major city and in many other centers of Federal concentration.

Our views on resulting energy conservation and labor-intensity relationship between renovation and new construction are set forth in our letter to Senator Randolph. While, again, we have no estimate of the capital cost savings as compared to new construction, we believe they would be significant.

We are pleased to have had the opportunity to acquaint you with our views on the measure.

Sincerely,

  
James Biddle  
President

Enclosure



March 25, 1975

The Honorable James L. Buckley  
 United States Senate  
 Washington, D. C. 20510

Dear Senator Buckley:

Thank you for allowing me to react to your Bill "Public Buildings Cooperative Use Act of 1975."

I found the proposal to be commensurate with the general principles of economics and conservation of energy and materials. I believe Section 3 of the Bill has the potential to elevate depressed areas and in combination with Section 4, provide economic stimulation which would serve as an additive to the overall effect.

I am particularly impressed by Section 4 of the Bill, which, among other things, would permit multi-use or cooperative use to ground floor space for "commercial, cultural, educational, or recreational" use. Having worked in both Government and commercial buildings, I believe this arrangement would have a very positive effect on the overall morale and activity of Government employees. Isolating bureaucrats in the "rabbit hutch" environment typical of many Government buildings is both stifling and depressing. Your proposal would, in my opinion, help overcome that phenomenon and could further induce substantial economic enterprise.

I hope my above remarks will be helpful as you contemplate the merits of your Bill.

Sincerely,

Richard O. Keelor, Ph. D.  
 Executive Vice President

## NEW YORK LANDMARKS CONSERVANCY

17 BATTERY PLACE, NEW YORK, N.Y. 10004

425-4085

April 28, 1975

Senator James L. Buckley  
Russell Senate Office Building - Room 304  
Washington D. C. 20510

Dear Senator Buckley:

The New York Landmarks Conservancy, a private, not-for-profit organization engaged in architectural and historic preservation throughout the State of New York, is in full support of the spirit and intentions of the Public Buildings Cooperative Use Act of 1975. That the legislation heralds the concepts of cooperative uses and the recycling of noteworthy Federal buildings in the urban environment as energy conserving and economically stimulating devices is an encouraging indication that progressive measures are being undertaken to make cities and communities more diverse and livable through the incorporation of innovative ideas and practical methods.

For the past two years, the New York Landmarks Conservancy has been involved in developing and implementing adaptive re-use proposals for architecturally and historically significant structures in New York City, including two properties that are under the jurisdiction of the United States General Services Administration (GSA): the United States Custom House at Bowling Green and the Federal office building at 641 Washington Street in Greenwich Village. The Custom House project exemplifies a cooperative, and thus far successful, effort on the part of public and private interests to preserve this distinguished structure through recycling. The Federal office building at 641 Washington Street was brought to the attention of the Conservancy by Administrator Sampson's office, who requested that we conduct a feasibility study for the re-use of this imposing ten-story building, now vacant, except for a post office occupying only a small portion of the total space. Under the aegis of the Conservancy, the Center for Research and Environmental Affairs at Columbia University is preparing this analysis.

Letter to Senator James L. Buckley

April 28, 1975

Page 2

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Our experiences with these Federal properties and in other projects in the City prompted us to initiate a survey of publicly-owned buildings, for it was clear that scant information existed regarding real estate owned by Federal, State and City governments in New York City. In developing the scope and design of this study, and during the first stages of data collection, we learned a great deal about the use and management of publicly-owned properties which forms the basis for the following comments concerning the Public Buildings Cooperative Use Act of 1975:

- 1) The institution of a cooperative use policy for Federal properties is a worthwhile venture, however, further incentives for public groups to utilize Federal buildings and their surrounding areas may be essential for the success of the program. While a certain amount of flexibility is contained in the legislation with regard to maintenance and after-hours activities, there are limitations of ground floor occupancy and competitive rent levels. The spatial needs of cultural and civic organizations and the amount of rent that many not-for-profit groups can afford to pay may require the inclusion of a rent abatement clause, or some sliding scale structure to encourage these entities to use Federally-owned space.
- 2) A clarification is needed in regard to payment of collected rental sums in lieu of taxes to localities for the purposes of municipal fiscal planning. It is not clear what happens to payments if these sums exceed or fall below tax valuations. It would be fruitful if any additional funds that are collected could be reserved for either preservation or cultural activities.
- 3) The National Trust for Historic Preservation is designated by the Act to recommend architecturally and historically significant buildings that may fulfill spatial needs of the Federal government as determined by GSA. A question arises as to whether or not the National Trust is the appropriate agency to perform this function. While it is the lead agency for historic preservation at the national level, its familiarity with properties in local areas may be insufficient to make recommendations concerning the possibility of cooperative uses in given locations. It may be useful to structure specific procedures for further coordination among local, state and federal agencies into the legislation to facilitate information exchanges.
- 4) It is significant that the legislation attempts to preserve buildings through recycling, however, there are no provisions in the Act to ensure that the properties that GSA will acquire will be treated in an architecturally sensitive manner.
- 5) The policies regarding publicly-used space and surplus properties vary in each unit of government and among each agency that has jurisdiction over properties. It would be highly valuable if this legislation could be structured to serve as a model or a directive

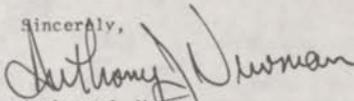
Letter to Senator James L. Buckley  
April 28, 1975  
Page 3

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to state and local governments to pursue a similar approach  
to the management of their real estate.

I hope that some of these suggestions can be incorporated into  
any further revisions of the Act, and I look forward to its  
prompt passage.

Sincerely,



Anthony J. Newman  
Executive Director

cc: Mr. Hal Braymen ✓  
Mr. Arthur S. Sampson

**ANDERSON NOTTER ASSOCIATES INC.**

ARCHITECTS AND LAND PLANNERS • 10 THACHER STREET, BOSTON, MASSACHUSETTS 02113 • (617) 227-9272

April 11, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

I very much appreciated your letter of March 19 to me in which you requested my review of your proposed "Public Buildings Cooperative Use Act of 1975".

I have reviewed your proposed bill in detail and have also had our development counsel review it.

We feel that this proposed act is imaginative and should achieve long-needed consideration by the Government in utilizing existing resources while achieving the proper protection of America's heritage. I feel it is also significant that you are introducing this bill as we begin to celebrate America's Bicentennial. My comments, which are minor, are as follows:

1. On page 2, lines 3 and 8, and page 4, line 11, I would suggest that the ability to lease space be included as in many instances the use of space by the government may be more efficient on a lease basis rather than an actual acquisition of property.
2. On page 4, the Act calls for the National Trust for Historic Preservation to identify existing buildings. You may wish to consider the National Advisory Council of Historic Preservation which is a governmental agency to conduct this function rather than the National Trust. The National Advisory Council has specific purposes which are complimentary to this proposed act and they also maintain continual liaison with the preservation officers of each individual state.
3. I would suggest that the term "historical or architectural significance" on page 6, line 20 include not only buildings but also properties and that at the end of line 21, the following additional language be considered: "or those buildings and properties deemed to be of National Register quality as determined by the state historic preservation officer for the state in which the building or property is located."

You also requested a building where the act could be effectively tried. The New London Connecticut Railroad Station is a National Register property that was designed in 1885 by H.H. Richardson, America's outstanding architect.

J. TIMOTHY ANDERSON  
GEORGE M. NOTTER, JR. •  
JAMES G. ALEXANDER  
ANTHONY C. PLATT  
PAUL J. MCGINLEY •

## ANDERSON NOTTER ASSOCIATES INC.

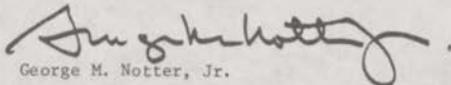
Attention: The Honorable James L. Buckley  
April 11, 1975  
Page 2

We are presently involved as architect-developer in saving this landmark from demolition and have plans ready for restoration. Our program calls for approximately 7,500 square feet of office space in addition to an AMTRAK passenger facility. The occupancy by the Federal Government for office use in conjunction with nearby government facilities would be an ideal demonstration of your proposed act. I would be happy to pursue this matter in more detail at your convenience.

I deeply appreciate your consideration in giving me an opportunity to comment on this innovative act.

Very truly yours,

ANDERSON NOTTER ASSOCIATES INC.



George M. Notter, Jr.

N/b  
Enclosures

**I. M. PEI & PARTNERS** *Architects*

*I. M. Pei FAIA  
Eason H. Leonard FAIA  
Henry N. Cobb FAIA*

*Associate Partners  
Leonard Jacobson AIA  
James I. Freed AIA  
Werner Wandelmaler AIA*

May 15, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

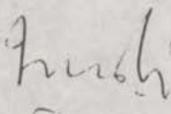
Dear Senator Buckley:

Please forgive my delay in responding to your letter of March 19, 1975 regarding the "Public Buildings Cooperative Use Act of 1975". In my absence from the office, members of my staff prepared comments which I am pleased to offer you in the memorandum attached.

Since our firm has been involved in the planning and design of urban renewal projects for many years and more recently active in several significant landmark conservation programs, we support this proposal being introduced by you and the Senate Committee on Public Works.

Sincerely,

I. M. PEI & PARTNERS

A handwritten signature in dark ink, appearing to read "Ieoh", followed by a long horizontal line extending to the right.

Ieoh Ming Pei  
aik  
att.

To Eason H. Leonard  
From Harold Fredenburgh  
Date April 30, 1975  
Re: Public Buildings Cooperative Use Act  
copy to

The Public Buildings Cooperative Use Act of 1975 (S.865) laudably seeks to foster the conservation and use of historic and architecturally significant buildings and to stimulate the social and economic life of the city within and surrounding Federal buildings.

While renewal, rehabilitation and restoration have been a part of Federal policy for years, the concept of recycling worthy buildings not only as a means of preservation but also as a way of making our cities more liveable represents an imaginative and timely departure from previous government attitudes concerning urban redevelopment.

In order to best achieve the goals of this Legislation, I would offer the following comments and suggestions:

1. The National Trust for Historic Preservation is designated by the Act to recommend architecturally and historically significant buildings which may meet the space needs of Federal agencies. While the Trust is the leading agency for historic preservation at the National level, its familiarity with local properties may be insufficient to make recommendations concerning appropriate structures and cooperative uses. For instance, in New York City, the New York City Landmarks Commission, the New York City Landmarks Conservancy, and the Municipal Arts Society are all actively involved with the conservation and use of notable buildings within the City. Reference in the Act to procedures for coordination among Local, State and Federal agencies would be desirable.
2. Further incentives for public groups to use Federal buildings and their surrounding areas may be necessary for the success of the program. While a certain amount of flexibility is contained in the Act with regard to maintenance and after-hours activities, there are the limitations of ground floor occupancy and competitive rent levels. The space needs of cultural and civic organizations and the amount of rent that many non-profit groups can afford to pay may require the inclusion of a rent abatement clause, or some sliding scale to encourage such uses.

3. There is no provision in the Act to ensure that the properties acquired by the GSA will be developed in an architecturally sensitive and compatible manner.
4. There is no provision for the finances necessary to administer the Bill, and/or to implement appropriate studies to determine the feasibility of recycling specific properties.
5. A clarification is needed with regard to payment of collected rental sums in lieu of taxes to localities for the purpose of municipal fiscal planning (Section 4(a)(1)). What happens to payments if these sums exceed or fall below tax evaluations? Can additional funds be reserved for either preservation or cultural activities?
6. The policies regarding publicly-used space and surplus properties vary with each unit of government. Can this Legislation serve as a model or directive to State and Local governments to pursue a similar approach to the management of their properties?

# Progressive Architecture

*Reaches more individuals who practice architecture than any magazine in the world*

600 Summer Street, Stamford, Connecticut 06904 203 348-7531

April 1, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

I fully endorse the intent of your public buildings bill, and I have no recommendations for changes in it. As far as I can tell, it meets all of the needs for legislation in this area quite well.

As you indicated in your floor statement, this bill would put into effect the recommendations of the Federal Architecture Task Force of the National Endowment. I am convinced that such legislation would be highly constructive; it is only regrettable that we have not had the benefit of such a policy sooner.

As for opportunities to apply these concepts, I cannot give a comprehensive list. There are, however, many commercial buildings of real architectural distinction and great potential usefulness which could be conserved under such a program. The Guaranty Building by Louis Sullivan in Buffalo, one of the key landmarks of American architecture, is in danger and is located close to the government center of the city. In Chicago many of the finest office buildings of the 1890's and the early decades of this century lie within a block or two of the new Federal Center and could conveniently be used for the extension of Federal functions. The commercial district of New Orleans, which has become the recent subject of a conservation effort, is also well located for such use, if the buildings are of an acceptable standard. I do not have an estimate of potential savings at hand. One case which might yield pertinent economic data would be that of the conversion of the Wainwright Building in St. Louis, another Sullivan landmark, for use by the state of Missouri. For information on that I would refer you to the architects, Hastings & Chivetta (7733 Forsyth, Clayton, Mo. 63105).

# Progressive Architecture

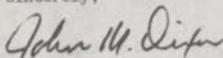
*Reaches more individuals who practice architecture than any magazine in the world*

800 Summer Street, Stamford, Connecticut 06904 203 348-7531

The Honorable James L. Buckley  
Page two  
April 1, 1975

Thank you for contacting me regarding this bill. If I discover further information of possible value to you, I will pass it along promptly.

Sincerely,



John Morris Dixon  
Editor

/bmc



## OFFICE OF THE MAYOR · CITY OF SEATTLE

WES UHLMAN MAYOR

April 14, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D.C. 20510

Dear Senator Buckley:

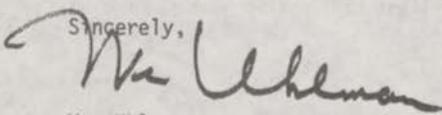
I have reviewed with great interest your proposed "Public Buildings Cooperative Use Act of 1975". Our efforts here in Seattle have been devoted to fostering the preservation of buildings of historic or architectural significance for some time and I feel that Seattle is one of the nation's leading cities in this regard. I can point with pride to our own efforts in Pioneer Square for recognizing and encouraging renovation efforts as well as occupying space in renovated structures. I certainly welcome and encourage further renovation of existing buildings into new federal offices, especially in Seattle.

Seattle is encouraging a more pedestrian-oriented and active environment in its downtown. As part of this direction, we have been advocating a more intense use of public space in and around public and private developments. We recognize the value of a more multi-use concept of activities within the downtown as well as encouraging additional public use of public facilities after normal working hours.

Your proposed legislation would support local efforts by adding another dimension of public-private use of space in federal office buildings. I certainly appreciate and support your efforts toward the desirability of commercial space in public buildings as well as rehabilitation of worthy and feasible structures for expanding federal government needs.

My thanks for your interest and support.

Sincerely,



Wes Uhlman  
Mayor

WU:aws

Your  
Seattle

Department of Community Development

OFFICE OF URBAN CONSERVATION - Suite 919 - Arctic Building  
Seattle, WA 98104

James Braman, Director



Wes Uhlman, Mayor

March 26, 1975

OUC 120/75

Senator James L. Buckley  
United States Senate  
Washington, D. C. 20510

RE: S. 865 - Public Buildings Cooperative Use Act of 1975

Dear Senator Buckley:

It is indeed an honor for me to comment on your proposed legislation "Public Buildings Cooperative Use Act of 1975."

We in Seattle, and I am sure the situation is similar across the country, have been looking forward to the introduction of such legislation at the federal level. Our experiences in Seattle have indicated, as quoted in your statement on the introduced bill and joint resolution, that the term "public buildings" has indeed become a contradiction.

We have taken steps to alleviate this problem at the local level by establishing such policies as necessary to allow the City of Seattle to lease overflow office space in significant buildings in need of restoration for competitive rates. The immediate benefits of this type of policy are apparent. The City's credibility provides a lease commitment that lending institutions will honor. The owner of the building can then solicit financing to affect the restoration of this significant building. City leases need not be longer than 3 to 5 years and after that term is up, the City can move on to another site and perform the same service for another property owner, while giving the first property owner the ability to rent space at a higher rate to private tenants.

Some of the indirect benefits that we have witnessed are: the increased property value after restoration, which provides an increase in tax revenue to the city and state; private buildings housing public facilities are brought up to full code compliance thus eliminating public hazards; and all

Senator James L. Buckley  
March 26, 1975  
Page Two

architectural barriers are removed to provide complete access for the handicapped, which normally would not occur through complete private tenancy. Also by injecting a fully occupied building into a neighborhood that would otherwise be unstable, provides a degree of stability, security, and incentive for buildings and operations to be maintained and grow within the immediate neighborhood. There are other benefits that we have seen through our own experience that I could elaborate on, but I believe you see the feasibility and common sense behind this approach which is embodied in your proposed legislation.

I would like to make the following constructive comments regarding S. 865.

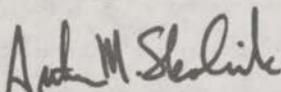
- (1) That you expand the description from buildings of historic or architectural significance to historical sites as specified in the National Register of Historic Places. Many times swapping property that is open space for buildings or visa-versa can be a useful tool to avoiding demolition of significant structures. Flexibility is the key.
- (2) That the federal government, where applicable, join with other government agencies - city, county, state - to jointly occupy individual sites when in fact each agency does not have the capacity to occupy a complete building.
- (3) That the location of such facilities take into consideration local development problems and how the specific location of a federal facility could aid in the resolution of those problems.
- (4) That, wherever possible, the federal government lease with the option to purchase, rather than to purchase directly; thus, keeping its options open to affect a greater number of restorations and adaptive uses.
- (5) That priority should be given to those significant sites in need of restoration and secondly to those that have been restored but are in need of tenants. Lease commitments should be viewed as an incentive to restoration.
- (6) The legislation should specify not just the National Trust for Historic Preservation, but those agencies (federal, state and local) that are involved in preservation activities within specific localities.

Senator James L. Buckley  
March 26, 1975  
Page Three

In summing up, I believe that the passage of this bill would do more towards federal participation in local preservation efforts than any single effort yet undertaken of this type.

I, not only endorse this legislation, but would stand ready to provide any back-up assistance or supporting data that you might need to justify the rationale and common sense of this bill.

Sincerely,

Handwritten signature of Arthur M. Skolnik in cursive ink.

Arthur M. Skolnik  
City Conservator

AMS:ww



STATE  
UNIVERSITY  
CONSTRUCTION FUND

April 22, 1975

The Honorable James L. Buckley  
United States Senate  
Washington 25, D.C.

Dear Senator Buckley:

Chancellor Boyer has given me the opportunity of responding to your recent letter regarding the "Public Buildings Cooperative Use Act of 1975."

I have reviewed the material you sent, and have considered it in light of our activities in constructing facilities for State University of New York. In response to the questions raised, I do, indeed, believe that the idea is a sound and workable one.

Regarding changes in the Bill, it is difficult at the State level to assess the impact of these proposals on the federal building program. I would like to suggest, however, that the relationship of this proposal to the federal facility delivery process be carefully considered, in order that the process is not distorted and delivery of facilities unnecessarily delayed.

Because of the rapid growth of State University, the vast majority of the buildings in our university system are relatively new. As to your request for suggestions regarding buildings, or cities, where these concepts might be most effectively tried, there are, in many New York State communities, original sound structures that could be rehabilitated. The University would have no difficulty supporting such activities in communities where we have campuses.

State University has made a singularly significant decision with regard to rehabilitation of existing buildings in Albany in the instance of the new headquarters of State University. These buildings in the capital city, will, when completed, be an example of the results that your legislation might be expected to achieve.

The University is currently in process of rehabilitating three major downtown structures: the former main office building of the Delaware

The Honorable James L. Buckley  
 April 22, 1975  
 Page Two

and Hudson Railroad, built in 1917; the Times-Journal Building (1918); and the original Federal Post Office Building (1884). The Delaware and Hudson Building is a copy of the famous Cloth Guild Hall in Ypres, Belgium, and is neo-Gothic in style. Because of its key location in the City of Albany, the rehabilitation of this building will help to upgrade the surrounding area.

Chancellor Boyer has said, "We as a society have come to the realization that the world of the future is not one of twenty-acre plots for each family. I believe that the city is the place of the future, tied to the nature of an ever more complex world." In this context he further pointed out that "It is especially appropriate for aesthetic as well as practical reasons that these buildings once again play a significant and important role in Albany's second major move to revitalize this historic region."

The University was aware that it would have been easier to find a site outside of the city on which to build a new structure. After considerable study, Chancellor Boyer was able to say, "No private enterprise could afford to renovate and rehabilitate the D & H, but it will cost the University no more to restore it than to build a new facility. What we are getting is a trade-off in heritage."

This effort has had the community's support, and in an editorial on November 13, 1972, the Albany Knickerbocker News concluded with this phrase: "So, a salute to University Chancellor Ernest L. Boyer and all others who had this vision for a University headquarters. Downtown Albany's day is dawning."

Although the cost of rehabilitating this building will be approximately the same as if a new building were to be constructed, there are, we believe, in addition to the preservation of our heritage, practical reasons for doing so. The entire exterior and all major interior aspects of the buildings are to be saved. This represents a saving in cost and in energy of mining, manufacturing, transporting, and erecting those portions of the buildings which are being saved. This, we believe, is a significant saving of natural resources, particularly energy, which at the same time does not measurably reduce the potential for employment in conjunction with the rehabilitating.

In rehabilitating existing buildings, there is the potential to build in energy savings. The American Institute of Architecture, in its pamphlet entitled "A Nation of Energy Efficient Buildings By 1990," pointed out:

The Honorable James L. Buckley  
April 22, 1975  
Page Three

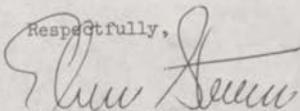
"If we adopted a high-priority national program emphasizing energy efficient buildings, we could, by 1990, be saving the equivalent of 1.925 million barrels of petroleum a day." This program envisions that "in retrofitting existing buildings, the demand upon the traditional energy systems would be decreased by an average of 30 percent." In new buildings, 60 percent savings are possible, according to AIA estimates.

In considering the question of rehabilitating existing buildings, it is usual to think of major undertakings. We believe, however, in an ongoing program of minor rehabilitation, which we practice and which is the process of continuous renewal of older building.

The proposed legislation, as you point out in your introductory statement, cannot be expected to work miracles. It does, however, provide an additional option for the preservation of federal facilities. The decision regarding the rehabilitation of an existing building is very complex. Each case should be evaluated on its own merits, taking into consideration history, aesthetics, energy conservation, community needs, and cost. There are many cases where existing buildings, for a combination of these reasons, are not worthy of rehabilitation. Further, there are those situations in which facility needs may best be satisfied by new buildings.

The wider range of alternatives that an administrator has at his disposal, the easier it is to find the best possible solution. The proposed Public Buildings Cooperative Use Act offers a new alternative, and we are pleased to know of its introduction.

Respectfully,



Elwin Stevens  
Manager of Marketing and Research

ES:vv

SECRETARY OF STATE



STATE OF WASHINGTON

BRUCE K. CHAPMAN

~~XXXXXXXXXXXX~~

OLYMPIA 98504

SAM SUMNER REED  
ASSISTANT SECRETARY OF STATE

April 2, 1975

The Honorable James L. Buckley  
United States Senate  
Washington, D. C. 20510

Dear Senator Buckley:

Thank you for your letter and accompanying material concerning the Public Buildings Cooperative Use Act of 1975. I am pleased to be asked to comment on the bill, and you may certainly use any of my statements for inclusion in the hearing record.

I think that this is an excellent bill, and the concept that it embraces is one that I have long endorsed. While I was a member of the City Council in Seattle, I was able to successfully push a similar program of adaptive use to encourage municipal agencies to locate in restored buildings.

There is no question that private enterprise needs to be encouraged to undertake restoration and preservation projects. If a governmental body or agency is able to promise to lease space in a building considered for restoration, the building owners are that much more encouraged to complete restoration. In Seattle, we were able to use this method effectively in a number of instances.

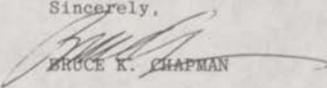
I am currently urging Governor Evans to adopt a similar policy directive for the Department of General Administration at the state level.

The multi-use concept is one with which I have had less experience, but one for which I can provide a useful anecdote to illustrate your point.

When the General Services Administration was negotiating with the local architects on the design of the Federal Building in Seattle, the design team asked GSA for permission to include shops on the ground floor. GSA was amenable "in principle". The Architects introduced idea after idea for florist shops, sidewalk cafes, specialty stores and so on, but each, in turn, was rejected by GSA. Finally, in exasperation, the architects asked, "What is acceptable?" The reply from GSA was, "Public toilets." Ultimately, some GSA information and publications outlets managed to get on the otherwise dead ground floor, but that was it.

Best of luck,

Sincerely,

  
BRUCE K. CHAPMAN

rs



