

**Comments on the DRAFT District of Columbia Archives Program of Requirements
submitted by
Archives Advisory Group, Council of the District of Columbia
September 30, 2022**

The District of Columbia's Office of Public Records and the Department of General Services recently released a DRAFT District of Columbia Archives Program of Requirements (hereinafter referred to as "the draft Program") for public comment. (See Contract No.: DCAM-22-CS-SS-0007; PO No.: 522881 prepared by Hartman-Cox Architects with EYP; September 1, 2022.) The Archives Advisory Group (AAG) of the Council of the District of Columbia has reviewed the draft Program and provides the following comments in order of the sections of the Program:

BACKGROUND AND GENERAL

The draft Program represents the first step in the process of designing a new Archives building for the District of Columbia at the University of the District of Columbia, Van Ness Campus. The draft Program addresses a range of architectural and engineering requirements including an evaluation of current holdings in need of storage, records storage options, space requirements, design requirements, and site analysis. Overall, the draft Program represents a significant step forward in the evolution of a new DC Archives and underscores Mayor Bowser's and her Administration's commitment to developing a world-class facility for preserving and showcasing the District of Columbia's rich history.

EVALUATION OF CURRENT HOLDINGS

One of the biggest challenges associated with the new Archives project is estimating storage volume needs. The task is made more difficult by the fact that existing DC records are presently stored in a variety of locations, and some unknown quantity of these records has never been properly inventoried or appraised. While the draft Program has done a creditable job of estimating current and future archival holdings, AAG strongly recommends a comprehensive survey of existing records those not presently held at the DC Archives in Naylor Court or at U.S. National Archives and Records Administration facilities.

RECORDS STORAGE OPTIONS

Planning the safe storage of records in an archival facility involves carefully balancing the need to store and protect the materials with the need to make them accessible to archival staff members and researchers. The draft Program's preferred option for the DC Archives project is 11-shelf high storage for both archival materials and records center materials. AAG recommends a 7-shelf high option for the archival storage. 11-shelf high shelving necessitates purchasing expensive forklift-type equipment to retrieve records or requires staff to climb on ladders for records retrieval. It is difficult to be ADA compliant with 11-shelf high shelving, as a variety of physical conditions make it impossible for persons to work at heights. Higher shelving heights increase the risk of injury to archival staff and to archival materials; lower shelving heights allows easier, unassisted or basic stepstool records retrieval, reducing risk.

PROGRAM SUMMARY AND GROWTH PROVISIONS

The draft Program does a good job of anticipating and planning for future growth and expansion by erring on the side of initial substantial space requirements while recognizing that if future growth is needed, existing spaces could be re-purposed.

AAG appreciates the effort to maximize efficiencies resulting from co-location with UDC. AAG notes the planned incorporation of the UDC archives and the Felix E. Grant Jazz Archives into the scope of the new DC Archives project and cautions about the potential difficulties of placing a dedicated DC archives within a multi-occupant building. AAG understands that the details of OPR and UDC sharing resources is still under review and strongly recommends that the full panoply of co-location opportunities, shared resources, and operational efficiencies be identified and addressed in a detailed Memorandum of Understanding. AAG respectfully requests the opportunity to review the MOU before it is executed.

The AAG is concerned about the new Archives being situated atop a below-ground parking garage. High concentrations of vehicle engine emissions in an enclosed area present a potential source of pollution that can adversely affect sensitive records, the building envelope, and public health. The building envelope control should at minimum specify a strategy to minimize infiltration of combustion products and other pollutants and further specify that any building membranes not be degraded by them. Building security requirements should address the means to ensure that the vehicles in the garage do not pose a safety threat to the building and its contents.

AAG encourages OPR and DGS to consider the possible re-purposing of a portion of the parking space in the underground garage beneath Building 41 for uses such as loading docks and storage of bulky archival and housekeeping supplies and like materials. As we understand it, there are currently over 700 parking spaces in the underground garage. OPR and DGS should obtain more information regarding actual utilization of the garage. Current utilization may decrease after planned new on-campus student housing is added and/or after UDC implements its planned Transportation Demand Management measures. Consistent with recent guidance in the city's Comprehensive Plan, the location's ready access to Metro and public transit, and the shared commitment to sustainable development that stresses public transit over private vehicles, eliminating the existing garage exit ramp to Van Ness Street and positioning the new Archives facility as far south as possible may allow for closure of the garage within the footprint of the new facility.

DETAILED SPACE REQUIREMENTS

AAG strongly supports OPR's desire for a lobby/reception area that is large enough to contain a "strong exhibit component" and that can be used for a variety of public events and gatherings. As such, AAG is pleased to see the draft Program plans for an exhibit gallery, meeting space, and a catering kitchen. We share the vision of the new Archives as not only a place for the functional storage and preservation of records, but also as an inspiring and engaging hub of activity, education, and celebration of the District of Columbia's history.

AAG understands that the space allocated to staff offices is that specified by DC government regulations. However, archives staff members must be able to work with archival materials in their offices, and the current space plan does not accommodate that business need. Workstation space layout should be adjusted to be large enough to enable each archives staff member to park a cart of records adjacent to the person's office desk.

The draft program includes an Exhibit Support Room to be used for fabrication of displays and exhibits. AAG recommends adding a separate Exhibit Support Room where aerosols such as paint and adhesives can be used (and properly ventilated) without contaminating other archival records or items being prepared for exhibit.

AAG appreciates that the draft Program includes a lactation room; i.e., a private space (other than a bathroom) for breastfeeding mothers. The lactation room should include places to sit, flat surfaces (other than the floor) to place breast pumps and other supplies, and access to electricity. It must lock from within to assure privacy and should be accessible to both staff members and researchers. The proposed lactation room envisions space and seating for one person. OPR and DGS should consider allotting at least one additional space to better assure that the needs of breastfeeding employees and Archives visitors will be met.

DESIGN NARRATIVE

The narrative calls for the new DC Archives building to be built at the current site of UDC's Building 41. The narrative presents a persuasive case that to realize the archives program effectively, Building 41 must be demolished. While we recognize the centrality of Building 41 to the campus design by a leading African American firm of the time, Bryant & Bryant, the new facility presents an opportunity to introduce new aesthetics and connect the campus to the District. AAG supports UDC in its expressed efforts to improve the appearance of campus buildings by moving away from the "Brutalist" style.

The AAG is pleased to see attention paid throughout the building system and envelope sections to energy efficiency. Energy consumed in buildings is DC's most significant source of greenhouse gas emissions. For several years now, the District has set net-zero energy consumption as a goal for public buildings through policies like the 2018 Climate and Energy Action Plan and Sustainable DC 2.0 Plan. Already DGS has opened two net-zero-ready schools with more under construction. Finally, this past summer, the Council passed the Clean Energy DC Building Code Amendment Act of 2021, setting a horizon for *all* new buildings to meet net-zero energy certification sometime after 2026.

The draft Program sets achieving LEED v4 Gold certification as a high priority. This would deliver a facility that is below average relative to projects in DGS's pipeline and short of multiple mayoral and council initiatives. AAG urges OPR to reevaluate the singular opportunities that an archive project presents, suitability of rooftop photovoltaic installation, LEED Platinum certification, LEED Net-Zero, Passive House, Living Future, or other sustainability standards provided under the 2021 Building Energy Performance Standards. The AAG recommends that DGS and OPR reach out to organizations such as the Building Innovation Hub during the charrette, anticipated at an early stage of design.

The AAG finds the Heating, Ventilation and Air Conditioning strategy outlined in the draft Program to be thorough. However, with increased attention to respiratory disease and indoor air quality in the wake of the COVID-19 pandemic, the AAG recommends further study of approaches to environmental hygiene in public areas, such as higher filtration, outdoor air supply, or UV-C fixtures within the path of recirculation.

SITE ANALYSIS

As noted above, co-location of the new DC Archives at UDC affords a variety of programmatic synergies (e.g., training and internship opportunities, joint public programs, and collaborative research endeavors). In addition to the opportunities identified in the draft Program, AAG urges OPR to further examine occasional use of existing UDC space, such as the use of existing UDC auditoriums for large gatherings and public programs. While the draft Program does include meeting-room space, it does not include plans for a slope-floor auditorium for large events with speakers, films, or other public history programs. Slope-floor auditoriums offer much better sight lines for such events.

The draft Program only cursorily addresses zoning and land use requirements that may apply to the razing of a large existing campus building and the construction of a new one in its place. Disposition and/or re-location of the emergency communication facilities currently present on the roof of Building 41 may involve regulatory approvals. OPR and DGS should begin now to identify applicable zoning and land use requirements to ensure this project is not delayed. OPR and DGS should also immediately begin the process of engaging affected Advisory Neighborhood Commissions, the University Community Task Force, community groups, and others.

Similarly, the Program does not discuss the 2021-2030 UDC Campus Plan, recently approved by the Zoning Commission. This document envisions significant changes to vehicular and pedestrian circulation that could mutually benefit the Archives and UDC if the Archives project is coordinated at an early stage. Specifically, the planned consolidation of garage access ramps along Van Ness Street could permit the siting of the Archives building as far south as possible. This may allow for more open circulation to the fields in the west, provide engaging street frontage for the Archives, and secure all areas underneath records storage with minimal loss of parking. Other parts of space reclaimed from the ramp could be useful for stormwater management.

OTHER (Miscellaneous)

DC's Office of the Chief Technology Officer will play a significant role in the development and operation of the new Archives facility. Electronic systems that support archival processes and public access to records will be essential and adequate space to support such systems will be needed, yet OCTO does not appear to have been involved in the development of the draft Program. OCTO should be a full partner in the Archives planning and should be brought into the process as soon as possible.