

# STAFF RECOMMENDATION

N. Witherell

NCPC File No. 6361



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## AMERICAN PHARMACISTS ASSOCIATION OFFICE BUILDING ADDITION 2215 Constitution Avenue, NW

Submitted by the American Pharmacists Association

April 29, 2004

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### Abstract

The American Pharmaceutical Association has submitted preliminary site and building plans for an office building addition to its historic building designed by John Russell Pope. The Commission approved the concept design in July 2003 with direction for further design development. The American Pharmacists Association must acquire lots at the north side of Square 62 (at C Street, NW) owned by the federal government and managed by the General Services Administration (GSA). A 17-foot strip of land along the west side of the property will continue in federal ownership to protect the viewshed from 23<sup>rd</sup> Street toward the Lincoln Memorial.

### Commission Action Requested by the Applicant

Approval of preliminary site and building plans pursuant to the Deed for the Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, which requires approval by NCPC of all structures erected in the square.

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### Executive Director's Recommendation

The Commission:

**Approves** the preliminary site and building plans for an office building addition to the American Pharmacists Association pursuant to the Deed for Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, as shown on NCPC Map File No. 23.00(05.17)-41356, **except for** the proposed location of the 22<sup>nd</sup> Street, NW parking garage entrance.

**Directs** the American Pharmacists Association to move the garage entrance farther north on the 22<sup>nd</sup> Street elevation, to the new construction, in order to minimize the visual effect on the Pope building.

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## PROJECT SUMMARY

### Site Description

The American Pharmacists Association (APhA) is located on the north side of Constitution Avenue, NW between 22<sup>nd</sup> and 23<sup>rd</sup> Streets, NW. Designed by noted American architect John Russell Pope, the historic building is listed in the National Register of Historic Places and contributes significantly to the row of exemplary monumental, Beaux Arts-style buildings along the north side of Constitution Avenue facing Constitution Gardens. The U.S. Department of State is located directly behind APhA, north of C Street, NW. The National Academy of Sciences is to the east across 22<sup>nd</sup> Street, and the Potomac Annex/Old Naval Observatory is to the west across 23<sup>rd</sup> Street.

### Background

At its July 2003 meeting, the Commissioners approved the concept design with the following conditions for further design development:

- The applicant study the relocation of the parking garage entrance to the addition rather than under the extended terrace adjacent to the Pope building, so that the views of the Pope building and the appearance of its grounds remain as unaltered and as undisrupted by vehicles as possible; so that the basic symmetry of the original terrace around the Pope building be retained; and so that the services for the office building be contained in the office building itself to minimize the adverse effect on the Pope building.
- A monumental, primary entrance be provided to the building from C Street and that the C Street façade be altered at the first story accordingly, as befits a long façade facing a street and a prominent government headquarters building.
- The preliminary and final site and building plans include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23<sup>rd</sup> Street.

In June 1999, the Commission reviewed the notice of availability of excess real property, stating that it had no objection to the site for private development provided the development be compatible with the area, that a 17-foot-strip of land along 23<sup>rd</sup> Street be retained in federal ownership to protect the viewshed from 23<sup>rd</sup> Street, and that the proposed development be reviewed by NCPC and CFA in accordance with the 1958 deed restriction. The deed requires APhA to secure approval from NCPC for any structures erected on Square 62.

### Proposal

The American Pharmacists Association (APhA) has submitted preliminary site and building plans for a new office building addition to its one-story monumental headquarters building. APhA proposes demolishing the 1962 office addition and replacing it with a six-story office building of 166,750 square feet of gross floor area. The office addition will be physically connected to the original Pope building by a one-story section. The proposal has been modified in several respects since the July 2003 concept approval and has been resubmitted for preliminary site and building plans. APhA plans to return to the Commission at the July 2004 meeting with final site and building plans, as well as a referral from the Zoning Commission to establish zoning for the federal land.

APhA has modified the design by:

- Creating a substantial pedestrian entrance on the C Street elevation (at the Commission's request).
- Aligning the addition's floor level with that of the Pope building, resulting in the insertion of a sixth floor of office space and an additional 2.5 feet of building height.
- Developing the fenestration of the office building addition as an appropriate backdrop to the Pope building (as a result of inserting a floor and at the Commission's request).
- Designing the flanking terraces and a schematic planting plan.
- Developing the design of the 22<sup>nd</sup> Street parking garage entrance under the terrace at the south location beside the Pope building presented in the concept.
- Retaining the existing 23<sup>rd</sup> Street parking lot driveway that had been proposed for elimination and creating a parking garage entrance in the new addition's west elevation.

In addition, at the Commission's request, APhA has submitted studies for a parking garage entrance at the north location (in the office building addition) on 22<sup>nd</sup> Street. APhA prefers the south location.

## PROJECT ANALYSIS

### Executive Summary

The staff recommends *approval* of the preliminary site and building plans *except for* the proposed parking garage entrance at the south location on 22<sup>nd</sup> Street, NW.

The staff notes the improvements in the addition's fenestration and massing, particularly as a result of the taller middle portion of the building. The terraces have been designed to enhance the Pope building and its relation to the office building addition.

However, the staff continues to believe that the parking garage entrance should be as visually distinct from the Pope building and its setting as possible. Staff directs APhA to continue studying possible locations for an entrance farther north than the currently proposed entrance at the side of the Pope building, in order to minimize the visual effects on the historic structure.

#### Office building addition and site design

The design of the office building addition is improved. The office addition appropriately reflects a neoclassical balance of solid to void (masonry facades to window openings) while conveying the appearance of a modern office building. The reconfiguration of the interior office plan has allowed opportunities for the improvement of the exterior fenestration and massing. The windows have sufficient surface area both to be distinguished from the Pope building's monumental facades and to indicate a modern office use. They are grouped vertically in a manner similar to the windows in the 1920s and 1930s office buildings along Constitution Avenue but they constitute a more contemporary version of that earlier era. The base of the building is now less neoclassically monumental and more similar in appearance to an office building, now that larger windows are used at the ground level. The architects are continuing to study the fenestration in preparation for the next phase of review.

The proposed additional 2'6" in height, which raises the height of the C Street elevation to 84 feet, does not appreciably affect the appearance of the addition, its relationship to the Pope building, or the sightlines from Constitution Avenue.

APhA has created a handsome C Street pedestrian entrance, as requested by the Commission. The interior plan has been modified as well, so that the principal circulation spine runs north-south.

The schematic planting plan shows the retention of the mature trees in front of the building, and the addition of street trees and other trees where space is available. Appropriately for APhA, medicinal herbs will be planted in the flanking terraces. A sidewalk and accessible ramp are proposed for the northern half of the block on 22<sup>nd</sup> Street, NW. This may need to be adjusted as the garage location is changed.

#### Parking garage entrances

The current submission shows two entrances to the 150-space parking garage, one on 22<sup>nd</sup> Street in the same location that the Commission reviewed at concept design. The other, on 23<sup>rd</sup> Street, is new.

The staff previously recommended that the 22<sup>nd</sup> Street entrance be located in the new office building, at the north end of the site. The Commission's Commission Action asks that the north location be studied. (Please see the text in the first bullet of the Background section on page 2 of the EDR.) APhA continues to prefer the south location due to a better grade situation and the potential for vehicle congestion at the north end of the street.

Staff acknowledges the operational difficulties at the north end of 22<sup>nd</sup> Street in front of the Department of State, but believes that the protection of the Pope building from the impacts of the new office building addition—which include the appearance of garage doors on the elevation beside (and in the foreground of the Pope building when seen from 22<sup>nd</sup> Street) at a location close to Constitution Avenue—is a significant concern.

Commendably, APhA has embraced a design philosophy of protecting the Pope building from the impacts of the new office addition as much as possible. This concern should be carried over to the garage entrance, which should be incorporated in the new construction behind the Pope building if at all feasible. One idea is to place it in the new one-story connector immediately behind the Pope building. This location is not as far north as the “north” corner location proposed at one time by APhA and recommended by the staff last year, but it has some of the advantages of the grade situation at the south location and it places the garage entrance door in the new portion of the building, north of the Pope building. The architects are studying this option and will provide something for discussion when ready.

At the April 15 Commission of Fine Arts meeting, CFA also stated its concern for the proposed south parking garage entrance, preferred an entrance in the new construction, and suggested moving the garage location northward as much as possible.

Last year the Commission saw one parking garage entrance, on 22<sup>nd</sup> Street. The current plan shows a second entrance on 23<sup>rd</sup> Street, in the location of the current curb cut and parking lot entrance. It will be used regularly for right in, right out garage traffic. It will also serve all garage traffic if 22<sup>nd</sup> Street is temporarily closed by the Department of State for security reasons. The garage entrance will be constructed in the new office building addition, north of the Pope building, at the lower level of the one-story connector. One garage entrance would be preferable, but staff acknowledges the desirability of a second entrance on a through street in this area.

#### Conditions for review of final site and building plans

At the July 2003 meeting, the Commission asked that a landscape plan, material samples, and documentation for the protection of the 17-foot strip of land along 23<sup>rd</sup> Street be provided at the time of preliminary and final site and building plan review. Since the current review is for preliminary site and building plan only, these requirements do not need to be met at this time. However, the landscape plan is well-developed. Materials will be presented during final review. NPS states that it is working with APhA to develop the terms for the protection of the 17-foot strip of land.

#### *COORDINATION*

##### Coordinating Committee

This project was coordinated at the Coordinating Committee’s June 18, 2003 meeting.

### Commission of Fine Arts

The Commission of Fine Arts (CFA) approved the revised concept design at its April 15, 2004 meeting. The commissioners commented positively on the fenestration and massing improvements, but asked APhA to move the parking garage entrance northward as much as possible. They also suggested that retaining walls be used at the sides of the garage entrance rather than grading the lawn to slope toward the driveway.

### National Historic Preservation Act

GSA is serving as lead federal agency for the purposes of consultation under Section 106 of the National Historic Preservation Act. The D.C. State Historic Preservation Office (DC SHPO) has been consulted since Spring 2002 to seek ways to minimize the adverse effects of the office addition on the Pope building and its setting. The D.C. Historic Preservation Review Board (HPRB) approved the current proposal at its April 22, 2004 meeting. Staff placed the report on the consent calendar; therefore the staff report was limited to approval of the height and fenestration changes without mention of the continuing study of the 22<sup>nd</sup> Street garage entrance location or the addition of a second garage entrance on 23<sup>rd</sup> Street. The HPRB is advisory to the DC SHPO in Section 106 matters. Section 106 consultation with staff and with HPRB at a future meeting will continue through the final design phase, culminating with GSA's Memorandum of Agreement already in early draft.

### National Environmental Policy Act

NCPC staff has analyzed, in conformance with the requirements of NEPA, the prepared Environmental Assessment (EA) completed by the General Services Administration for both the final disposition of the property and a proposed building addition. Staff has prepared a Finding of No Significant Impact (FONSI) based on adoption of the EA and its independent review determining that the EA conclusions represent an effective analysis of the potential environmental impacts of the plans submitted to the Commission by the American Pharmaceutical Association for the new headquarters addition.

Under the proposed plan, as described in the EA, no significant adverse impacts to the soils at the site are anticipated. Temporary disturbance to surface soils would occur during the removal of the existing surface landscaping and hardscape along the south side of C Street, NW. To reduce the potential adverse impacts associated with soil disturbance, a Soil Erosion and Sedimentation Control (SESC) plan for construction activities on the property would be developed. The SESC plan would incorporate best management practices (BMPs) to prevent erosion of soils from the property. District of Columbia stormwater management objectives would be adhered to with the introduction of additional catch basins and vegetated swales. As part of the application for a construction permit, the contractor must submit an erosion and sediment control plan or a storm water management plan (or both, depending on the nature of the construction). Storm water management, erosion and sediment control, and floodplain management within the District are regulated in accordance with District of Columbia regulations at DC MR, Title 21, Chapter 5 and Title 20, Chapter 31.

Other issues of the environmental review focused primarily on air quality consequences, traffic effects, and cultural/architectural resource impacts.

Under the submitted proposal, significant adverse impacts to air quality of the region or surrounding area are not anticipated. Regional mobile source air emissions from trucks and heavy equipment would occur only during construction for short durations. All construction activities would comply with local and regional air quality regulations. Implementation of project would result in an increase of pollutant emissions generated by employee, visitor, and delivery vehicles. Mobile emissions were calculated from the vehicle trip generation data for the project traffic analysis emissions factors using the USEPA model MOBILE 5, and an approximated average trip length of 18 miles per trip (Wells and Associates, 2002). The estimated post-construction emissions under preferred plan would be less than the *de minimis* thresholds, and less than ten percent of the projected area emissions. Therefore minor, adverse, short-term, direct impacts to air quality would occur during post-construction.

In addition to the possible regional impact of vehicle emissions, a review of potential for local carbon monoxide (CO) “hot spots” at locations where traffic is potentially congested has been accomplished in the NEPA review. Procedures and guidelines used by agencies that sponsor transportation projects to evaluate the potential local level CO impacts of a project are contained in Transportation Project-Level Carbon Monoxide Protocol (the Protocol) (UCD ITS, 1997). The protocol provides a methodology for determining the level of analysis, if any, required on a project. The guidelines comply with the Federal Clean Air Act, Federal conformity rules, and NEPA. Although the Proposed Action is not a transportation project, the project would result in an increase in vehicle trips on local roadways and intersections. Therefore, the use of the protocol is appropriate for determining potential local level CO impacts.

The Metropolitan Washington DC area is a regulated area for CO. Therefore in accordance with the Protocol, only projects that are likely to “worsen air quality” necessitate further analysis. The protocol indicates that projects that increase delay at signalized intersections operating at level of service (LOS) F worsen air quality. LOS D is considered the minimum acceptable LOS in urban areas, such as Washington, DC. However, there are many areas within an urban region (e.g., downtown) for which LOS E (saturated flow or full capacity) is believed workable for short periods of time, such as during peak commuter periods (Wells and Associates, 2002). The traffic analysis conducted for project indicates that the site intersections in proximity to the proposed addition would operate at LOS D or better, except for the intersection of 23rd Street and Constitution Avenue, which would operate at LOS E. Using the protocol screening procedure for estimating CO concentrations, it was determined that implementation of project would not increase CO levels at this intersection during peak morning or afternoon periods when compared to the year 2005 build-out without project implementation. Therefore no direct impacts to air quality are anticipated due to future potential increased traffic.

Vehicular Traffic and Local Roadways (Level of Service -LOS) impacts are varied for the project, but overall are not significant. The proposed new APhA building addition would provide an increase of approximately 111 parking spaces (146 in the proposed underground parking garage, with a loss of the existing 35 surface spaces). Given that on-street day-long

parking is not available, nor are there available public parking garages less than one-fourth mile away, there are limits toward the number of vehicles that occupants of the proposed building could use. Only slightly more than 100 vehicles could be accommodated at the new building at one time, so there would be an increase of approximately 100 vehicles using the adjacent roads. The project traffic study estimates that at the morning (a.m.) peak hour, about 93 vehicles would be arriving or departing the site, with about 88 doing so during the afternoon (p.m.) peak hour. (The difference represents irregularities in work hours--on any given day, some people go home before or after peak hours.) Although the detailed traffic study based trip projections on a slightly smaller building (178,000 square feet versus 193,000 square feet), it assumed essentially the same number of parking spaces. The study concludes that all intersections in the project area would continue to operate within their theoretical capacities (at LOS E or better in 2005, with full build-out and occupancy of the APhA expansion, whether or not C and 21st Streets, adjacent to the State Department, are open to traffic). Consequently, the proposed APhA expansion would have a minor adverse impact on traffic in the area.

Construction traffic activities associated with the expansion of the APhA would be required by the District of Columbia to adhere to controls listed in the Manual on Uniform Traffic Control Devices (USDOT, 2000), and any additional District of Columbia requirements, such as those in the District of Columbia Department of Public Works Traffic Control Manual, Standard Specifications for Highways and Structure (DCDPW, 1996). Trucks associated with the removal of excavated materials and heavy construction equipment accessing the APhA site could adversely impact traffic flow during the peak a.m. and p.m. hours. As a result, these trucks would be restricted from accessing the site or using local roadways during the a.m. and p.m. peak hours. Variations, however, may occur in scheduling of certain material deliveries.

Because the number of vehicles that could be accommodated at the project site would be limited, some of the 700 to 850 workers using the proposed new building would have to arrive by carpool or mass transit, with perhaps some limited number of walkers or bikers. The project's traffic analysis assumed an average vehicle occupancy of 1.4 people, in part due to the carpooling that is encouraged by many downtown private office operations and regional jurisdictional emphasis with High Occupancy Vehicle initiatives. This would leave about 525 to 650 workers (75 percent of the workforce) to arrive by Metrorail or Metrobus. This is roughly consistent with general projections by the Washington Metropolitan Area Transit Authority (WMATA) of mass transit use (45 to 75 percent) at several major downtown office buildings, and the Metropolitan Council of Governments' projections of 66 to 70 percent mass transit usage (ARC, 1999). WMATA expects ridership to increase roughly three percent annually due to growth in the Metropolitan Area. WMATA also has studied and forecasted ridership to 2025 based on projected growth in the Metropolitan Area. Projected growth includes all proposed projects known by the District planning agencies. Based on these projections, both the Foggy Bottom and Farragut North Metrorail Stations are considered adequate to handle the increased growth projected to 2025, with potentially only limited station modifications that would improve circulation between the mezzanine and platforms at both stations. It should be noted, however, that recently Metro's Board of Directors has highlighted limited funding for future improvements to the system.

An approximate worst-case estimate was made to gain information on possible impacts on Metrorail from the proposed APhA expansion. The rough estimate used Metrorail's ridership station entry and exit numbers during the a.m. and p.m. peak hours for June 2002 at the Foggy Bottom and Farragut North Metrorail Stations (Stedman, 2002). The rough estimate assumed 600 of the office workers in the proposed APhA building would use Metrorail, and that these users might all be new users of the system. The EA analysis assumed that half of these workers used the Foggy Bottom Metrorail Station and half used the Farragut North Station, with the approximate estimated increase due to APhA expansion in the a.m. peak and p.m. peak hours at Foggy Bottom being less than three percent. The Farragut North Station rough estimate increase would be less than two percent. Both of these estimates are within WMATA's expected annual increase.

NCPC submission guidelines require that a Transportation Management Plan (TMP) be prepared for any project that would increase employment level of a site to 500 or more persons. Even though the project is a non-federal operation, the Commission does have full approval authority over its implementation. Based upon its proposal to provide an office building that would employ 850 employees to the project site, the APhA is obligated to implement an effective TMP that would conform to the Federal Transportation Management Program Guidelines adopted by the Public Building Service of the GSA. *The APhA must submit its TMP to the NCPC for approval prior to final approval of the project design given that the current proposal is modifying parking facilities within its existing site.*

The principal objective of a TMP is to reduce single-occupant vehicular work trips within the National Capital Region, thereby reducing traffic congestion, vehicular miles of travel, and vehicular emissions, all in keeping with the objectives of the Clean Air Act Amendments. Expected build-out for the proposed APhA expansion is anticipated for 2005 to early 2006.

Based on the proposed tenant/user characteristics for the new building, the following are expected to be key elements of the final TMP for the proposed APhA expansion:

- Parking Management - APhA could use pricing to further reduce the number of vehicles brought to the building. It could also allocate spaces for vanpools or carpools.
- A Transportation Coordinator -APhA could establish a Transportation Coordinator for the building, who would provide employees with transit and ridesharing information, help coordinate formation of vanpools or carpools, and oversee assignment of parking spaces.
- Vanpools - Under this arrangement, building employees would be encouraged to share the ride to work using vans with capacities of 7 to 15 passengers. Options include employer-owned vans, employer-leased vans, employee-owned or leased vans and contractor/operator provided vans.
- Carpools - Basically, this arrangement calls for commuters to share auto use, and is formed with a minimum of two people commuting together on a regular basis. Participants would share common residential areas and work schedules. The utilization of Diamond/HOV lanes on the regional commuting routes is a further incentive for this strategy.
- Guaranteed Ride-Home Program - APhA could also subsidize this program to assure carpools that they would be able to get home if unexpected circumstances arise during a given day that prevents them from riding home with their usual carpool.

- **Transit Services** - The APhA site is accessible from two Metrorail stations, Foggy Bottom, about 7 blocks away, and Farragut North, about 13 blocks away, as well as the WMATA Metrobus service that runs 7 lines in the area. Because of the distances to the Metrorail stations, APhA's TMP might establish a shuttle van service from its building to the Metrorail stations, much like the one run by the Department of State. APhA could also provide fare subsidies to workers using Metrorail.
- **Staggered Work Hours** - APhA could also establish a variable work program that includes flextime, a compressed workweek, and staggered work hours for workers in the new building to reduce the peak hour vehicular trips and peak hour use of Metrorail.
- **Bicycling** - APhA could also encourage bicycling to work by providing secure storage for bicycles along with locker, shower, and dressing facilities. To the extent that measures such as these are incorporated into the TMP, the effects on traffic and on Metrorail/Metrobus services would be further lessened.

Cumulative Impacts of the proposed project have been estimated with an annual traffic growth rate of one-half percent growth compounded for four years to 2005 in the EA. This growth reflects the cumulative impact of regional traffic growth and traffic that would be generated by current and proposed projects in the area. While the one-half percent annual growth rate was used in the interest of conservatism, it is recognized by NCPC staff to be acceptable to both the District of Columbia Department of Transportation standard and current guidelines utilized by FHWA in similar studies regarding nearby areas of the city. The growth rate was applied to all movements (with the exception of those entering or exiting the APhA site) on 23rd Street, C Street, 22nd Street, and Constitution Avenue. The results indicate a Levels of Service with C Street and 21st Street closures that would have limited increase traffic delays at the intersections of Constitution Avenue with 22nd and 23rd Streets. The Constitution Avenue/23rd Street intersection would operate at LOS D (instead of LOS E) in the morning peak hour and LOS E (instead of LOS D) in the afternoon peak hour. The Constitution Avenue/22nd Street intersection would continue to operate at an acceptable LOS. Therefore, the proposed APhA expansion would have no cumulative adverse impact on traffic in the area with the closure of C Street.

With regard to contaminants at the site, under the proposed action, the GSA parcel would be sold to the APhA, and an addition would be constructed. Site decontamination and preparation for construction, demolition of the existing APhA annex, construction of new building and parking garage, and new building operations and maintenance would be the activities conducted involving this issue and would be the responsibility of APhA under the terms agreed to with GSA. The first phase of site preparation for construction would be decontamination. A commercial hazardous waste disposal company would be contracted to handle the transport and disposal of the contaminated soils. The contaminated soils would be excavated using a backhoe and placed in dump trucks to be hauled off-site to a hazardous waste permitted landfill outside the District. The contaminated soils would be immediately removed, and would not be stored on-site for any duration of time. A hazardous waste manifest would accompany each shipment of waste from the point of pick-up to the destination. This process would take approximately four months before all the contaminated soil is removed from the site and deposited in a permitted landfill. During transport, the soils would be covered to prevent spills during transit. Removal of contaminated soils from the GSA parcel would contribute to the remediation of groundwater contamination that potentially would occur in the general vicinity of the project.

With the proposed action, no significant adverse impacts to terrestrial resources or wildlife are anticipated. During construction, clearing of existing vegetation would be minimized as much as possible. Impacted vegetation would consist of cultivated species of grass and ornamental species of trees and shrubs. Limited wildlife habitat would be temporarily disturbed for the duration of the construction activities. However, after construction, vegetation would be reestablished and would provide similar habitat for urban wildlife.

Staff finds overall that the proposal incurs minor environmental effects and the mitigation of those impacts is fully defined by the NEPA document evaluation. The separate National Historic Preservation Act Section 106 review and mitigation actions will be further specified by additional analysis and design efforts in consultation with the District of Columbia State Historic Preservation office, and a Memorandum of Agreement will be developed. Staff believes GSA's determination is sufficient for evaluation of the effects of the proposed project and supports the mitigation actions identified for release of the land area from federal ownership or control. Staff further believes that the design issues regarding the effects on the historic property have been identified and are being mitigated through further design development, as noted in the EDR.