

STAFF RECOMMENDATION

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NCPC File No. 6611



FEDERAL OFFICE BUILDING 8 BUILDING MODERNIZATION 200 C Street, SW Washington, DC

Submitted by the General Services Administration

September 27, 2007

Abstract

The General Services Administration (GSA) has submitted a revised concept design for the modernization of Federal Office Building 8, located at 200 C Street, SW. The project will convert the primary building use from laboratory to office space, modernize the existing facade with additional areas of glazing, provide a security screening pavilion as a building addition, and transform a surface parking area in a public plaza. When modernized, the building would house Architect of the Capitol (AOC) staff as the primary tenant, as well as a second federal agency. The project also proposes perimeter security primarily in public space surrounding the building. GSA has determined that it does not require an Environmental Assessment based on its determination that the building would not be eligible for listing on the National Register.

Commission Action Requested by Applicant

Comment on the concept design for site and building plans pursuant to 40 U.S.C. § 8722(d) and Section 5 of the National Capital Planning Act of (40 U.S.C. § 8722(b)(1)) .

Executive Director's Recommendation

The Commission:

Comments favorably on the renovation of the existing Federal Office Building 8 at 200 C Street, SW, as shown in NCPC Map File No. 1.72(38.00) 41669, with the exception of the proposed security screening pavilion and perimeter security elements.

Comments unfavorably on the perimeter security design because the perimeter barrier system intrudes into the public right-of-way on all four sides of the building and **comments unfavorably** on the security screening pavilion proposed for the building yard because the pavilion addition pushes the front of the building 48 feet further north and therefore pushes the perimeter security

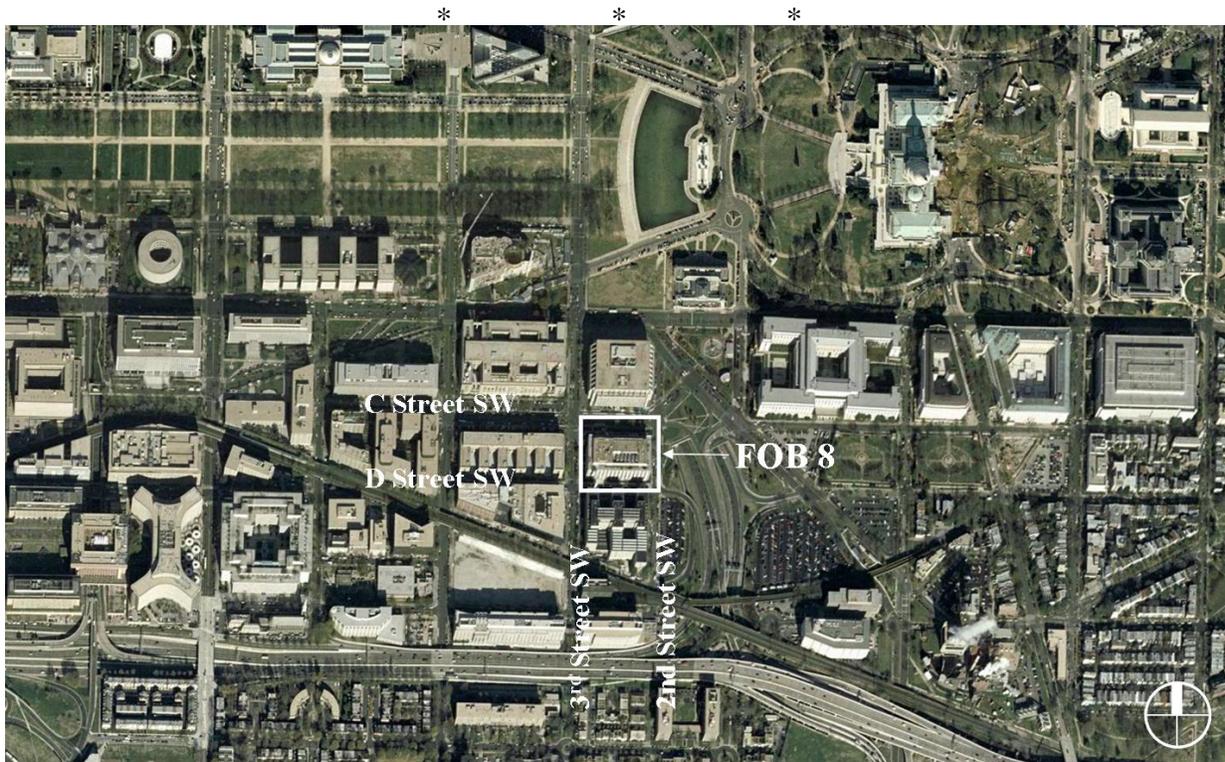
line into public space, and **requires** GSA to submit an analysis of the level of security required in accordance with NCPC’s Urban Design and Security Objectives and Policies adopted May 5, 2005 and related submission guidelines.

Requires that the applicant reduce the size and mass of the security screening pavilion to minimize impact to building’s setting if the screening pavilion remains a part of the project.

Requires that GSA submit its Third and C Streets Southwest Master Plan for Urban Improvements for NCPC review and approval prior to submitting the preliminary phase of this project.

Reminds the applicant that the scope of the project does not fall within NCPC’s criteria for categorical exclusion under NEPA, and therefore GSA must prepare and submit an environmental assessment for the project before it is submitted for preliminary review.

Reminds GSA that it must consult on the full effects of the undertaking to include perimeter security under NHPA Section 106, which requires establishing an area of potential effect, and notes that in its determination GSA has not considered the L’Enfant Plan and adjacent buildings that form the setting at 3rd and C Streets, SW.



Site Context

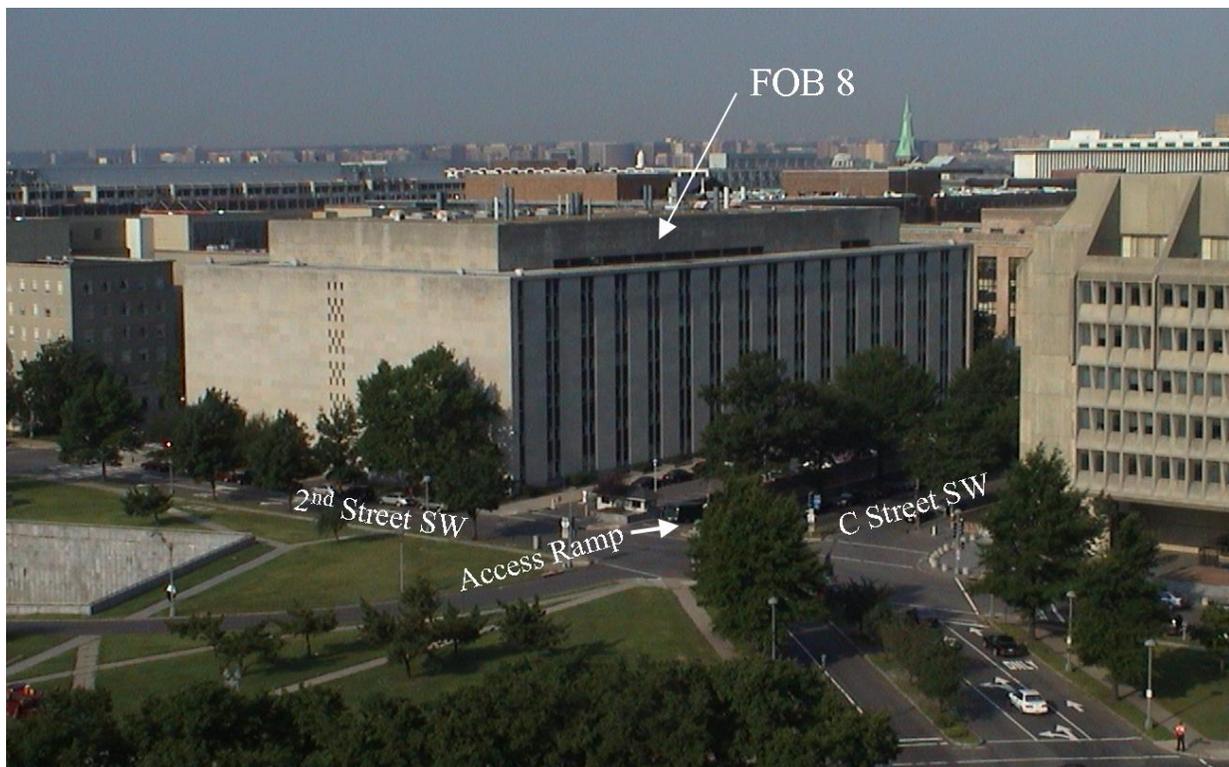
PROJECT DESCRIPTION

Site

Federal Office Building 8 (FOB) 8 is located southwest of the Capitol, one block south of Independence Avenue and the National Mall in the Southwest Federal Center. FOB 8 fronts on C Street with views of the Capitol dome through open space to the northeast (the site for the future American Veterans Disabled for Life Memorial). The rectangular building is set back from C Street by over 100 feet. The set-back in front of FOB 8 contains a ramp to underground parking, accessed from 2nd Street, and surface parking. The limestone faced building (windowless for most of its east and west elevations except for slit windows at stairwells), has six levels above grade.

Background

GSA plans to modernize the building comprehensively, after which its use will be converted from 70% laboratory to office space. It will remain a GSA owned building, although the Architect of the Capitol (AOC) will be the primary tenant. GSA proposes to reconfigure interior space for lobby and entry atria as well as reconstruct the exterior façade to add windows and modernize the building façade. At its September 1, 2005 meeting, the Commission commented favorably on a concept that featured a new exterior composed of mainly glazed curtain wall to maximize the amount of daylight of the interior of the building, for which a security pavilion addition was not proposed. The Commission deferred comment on the landscape until more information on perimeter security was included. Since then, the primary tenant has rethought the image it wished to project from that of a contemporary seemingly transparent glass building to one of heavier construction and greater solidity.



Existing Building: Corner of 2nd and C Streets, SW

Proposal

As currently proposed, the new exterior would retain existing limestone but bands of horizontal windows would be replaced with projecting window bays, and window glazing would be added on the east and west ends of the building. A security pavilion would be provided as a building addition in front of the existing north entrance. Building alterations would include:

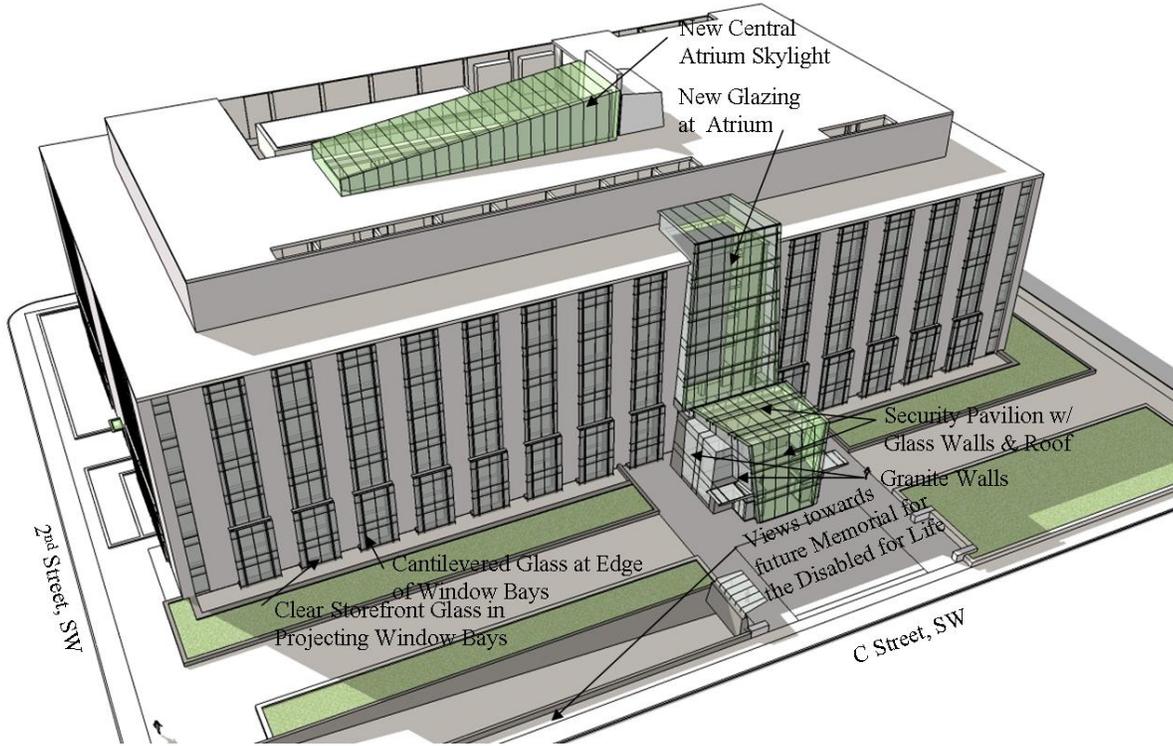
- Conversion from laboratory space to modern office space.
- Reconfiguration of interior space for lobby and entry atria to maximize amount of daylight to the interior of the building.
- Two-story addition of glass and granite security screening pavilion at building entrance.
- Projecting window bays with clear glass cantilevered at edges would replace vertical bands of windows on north and south faces.
- Wide projecting window bays with clear glass would replace portions of limestone punctuated by full height vertical “columns” of existing limestone. The pattern of slit windows would remain, but would be replaced with new glazing.
- Angled metal panels at the roof penthouse would screen mechanical equipment.
- Blast resistance for exterior walls, windows and frames to meet a medium level security.



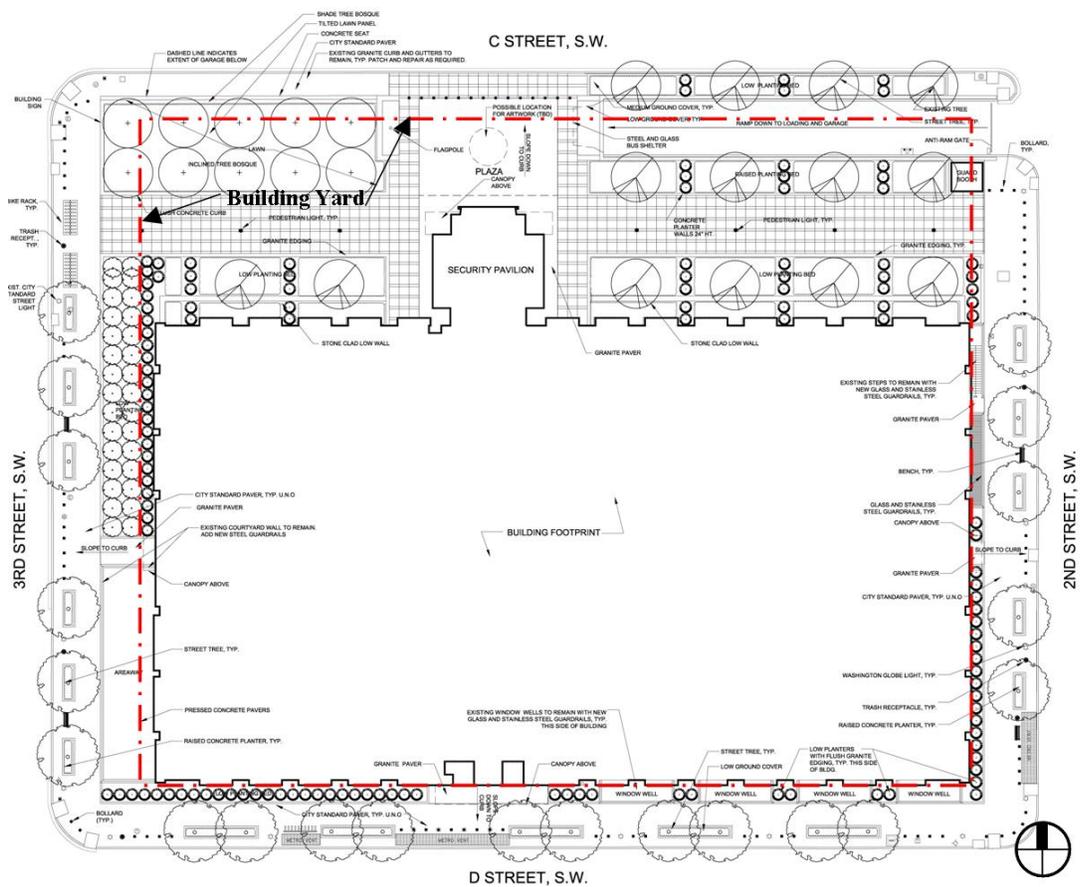
Rendered View at Corner of 3rd & C Streets, SW

Site and landscape alterations are shown in concept submission but anticipated to be developed further with submission of preliminary site and building plans:

- Replace paved parking between the building and C Street with a public plaza and green open space with public art leading to a security pavilion for screening pedestrians in front of the building lobby.
- Perimeter security formed mainly by raised planters interspersed by bollard lines on all sides of building with varying indications of benches shown in different views either as



Aerial View of 2nd and C Streets (Above); Perimeter Security & Landscape Plan (Below)



PROJECT ANALYSIS

Building Renovation

Staff supports the use of clear glass to allow maximum visual access to the building interior at the ground floor level. Staff notes that atria at the entry lobby and interior of the building would maximize the amount natural daylight to the interior of the building. Glazing added to east and west ends will allow additional daylight into the building. The pattern of slit windows will be retained on the east and west, which will preserve that aspect of the building's modernist character. As noted earlier, clear glazing will be used both for both window replacement and the addition of windows to previously solid limestone exteriors.

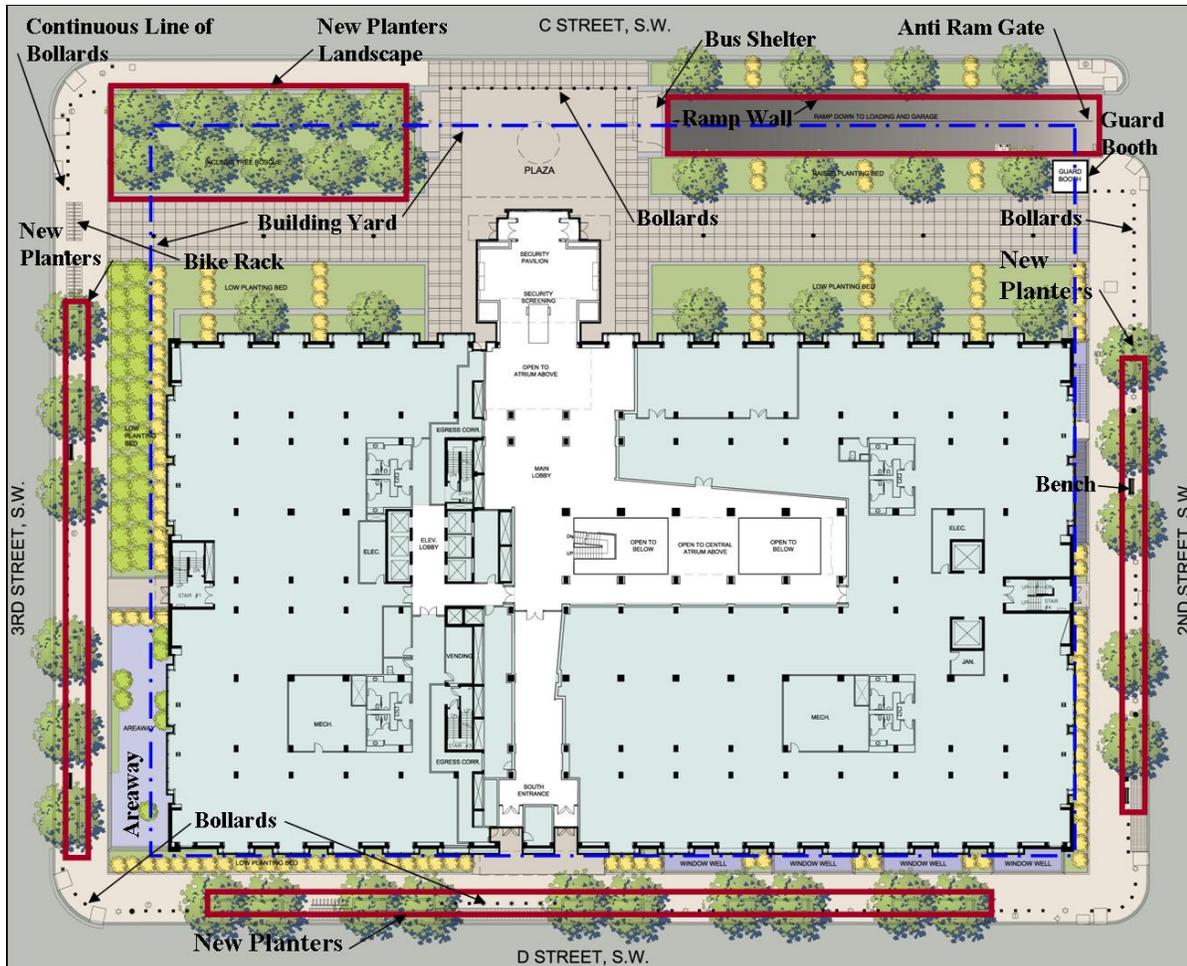


Rendered View at 3rd and C Streets; North and West Faces

NCPC Urban Design and Security Objectives and Policies adopted May 5, 2005 state that building additions to accommodate pedestrian screening security operations should be compatible with existing architecture and not project into L'Enfant Plan rights-of-way, other public space, or viewsheds. The proposed addition projects beyond the building envelope into the site's setback, which the applicant proposes to use as public space.



Security Pavilion Details



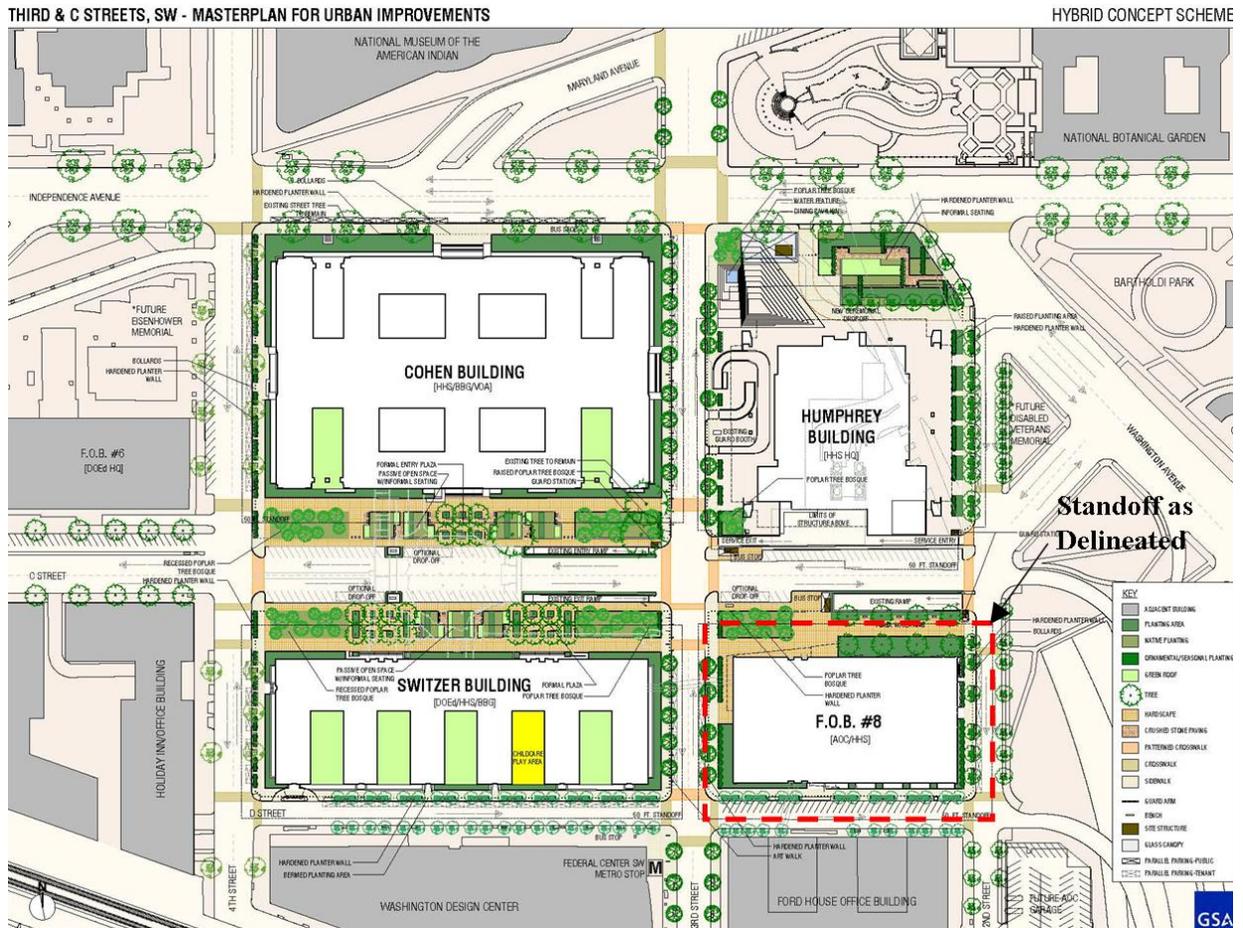
Site Plan: Landscape and Perimeter Security

While staff acknowledges the validity of emphasizing the existing understated building entrance by making it more visible, staff recommends that the proposed two-story security pavilion with battered glass and granite walls and angled glass ceiling adds significantly more bulk than needed to create a legible entrance. If the screening pavilion remains, staff recommends that the applicant reduce its size to minimize impact to the public plaza.

Site, Landscape, and Perimeter Security

The deep setback on the building’s C Street front is characteristic of its modernist origins and is shared by three of the four buildings intersecting at 3rd and C Streets. Part of the assessment of the building’s significance and character-defining features will involve an assessment of its setting, including the characteristic setback of a building of this era on its site. As proposed, the security screening pavilion on the C Street facade as well as the lines of bollards and planters and at the sidewalk curb surrounding the building on all four sides would project beyond the building wall envelope into space intended for use as a public plaza and into other public space under the jurisdiction of the District of Columbia government.

Staff believes that the setback is a characteristic setting from the modernist era and expresses concern that the screening pavilion should be designed to take into consideration the views out across the plaza's setback and along C Street. Although the plaza is not within the L'Enfant rights-of-way, GSA intends for it to function as public space in that it will serve as a public plaza for employees, visitors, and other pedestrians. NCPC's Urban Design and Security Objectives and Policies of May 5, 2005 encourage building additions for pedestrian screening operations to be compatible with existing architecture and not project into L'Enfant Plan rights-of-way, other public space, or view-sheds; and also encourage that perimeter security be kept within the building yard.



In-Progress Master Plan Concept for 3rd and C Streets, SW

The front building set back depth would also enable the applicants to achieve the stated security level and required building standoff, which is delineated by a dashed line on the Third and C Streets, SW Master Plan for Urban Improvements “Hybrid Concept Scheme” (HCS), enclosed for reference. However, the barrier line proposed on the FOB 8 site plan is shown outside the standoff as delineated on the HCS, and outside of the building yard, within the L'Enfant right-of-way. Staff recommends that the applicant consult with NCPC staff and DDOT's Office of Public Space in developing perimeter security that respects the public space and L'Enfant rights-of-way for FOB 8. Staff reminds the applicant to consult on public space impacts of the Third and C Streets SW Master Plan for Urban Improvements with DDOT's Public Space Committee Requires and submit

the Master Plan Improvements to NCPC for review and approval prior to submitting the preliminary phase of this project to resolve discrepancies.

NCPC's Urban Design and Security Objectives and Policies state that interior building space programming for new buildings, or for major renovation projects, in urban settings should consider locating critical uses and operations in areas of the building that will minimize the need to place perimeter security in public space. For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet. If the distance from the face of the building to the outside edge of the building yard is less than 20 feet, then perimeter security barriers may be permitted in public space adjacent to that building. The placement of security barriers in public space is generally discouraged and should be minimized.

Staff notes the Commission's requirement that the applicant submit its analysis of the level of security required in accordance with NCPC's Submission Guidelines prior to submitting the project for preliminary site and building plans. Therefore, staff concludes that information on perimeter security elements is insufficient for favorable comment at this time. Placement of bollards shown at C Street in front of the plaza is inconsistent, as are the security elements shown. Staff urges GSA to further study and refine the perimeter security design on all four sides of the building, including the placement of the screening pavilion, as encouraged in NCPC's Urban Design and Security Plan Objectives and Policies.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed the proposal on September 12, 2007. The Committee forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies represented, the participating agencies were: NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the Fire Department; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

CONFORMANCE

The National Capital Urban Design and Security Plan Objectives and Policies

Staff finds that the project as submitted is not consistent with relevant policies, including Urban Design and Security Plan Objectives and Policies that NCPC adopted May 5, 2005

- that building additions to accommodate pedestrian screening security operations should be compatible with existing architecture and not project into L'Enfant Plan rights-of-way, other public space, or view-sheds, and
- that interior building programming for new buildings, or for major renovation projects, in urban settings should consider locating critical uses and operations in areas of the building that will minimize the need to place perimeter security in public space.

Comprehensive Plan for the National Capital

Staff finds that the proposed project would not be inconsistent with the relevant policy below in the Comprehensive Plan for the National Capital, largely due to GSA's demonstrated efforts to:

- Modernize and rehabilitate existing federally owned facilities in the monumental core for federal workplaces before developing new facilities.

However, in light of the proposed security pavilion at the north entrance, the project may be inconsistent with the following relevant policies if no further consideration is given to the setting and placement of the pavilion on the building's site:

- Protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image, and
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.

Master Plan

Although the applicant has not submitted its Third and C Streets, SW Master Plan for Urban Improvements for NCPC review and approval, GSA has included the Hybrid Concept Scheme" (HCS) showing its progress, for reference with this submittal of FOB 8. The HCS delineates bollard lines, often outside of standoff distances shown for the FOB 8 and the three buildings that share the intersection with it. (Three of the four buildings have the same deep setbacks from C Street, allowing them to meet standoffs as delineated on the plan). The set back depth on C Street would enable achieving the stated security level and required building standoff, shown delineated by a dashed line on the HCS. However, the bollard line as proposed on the FOB 8 site plan is outside the standoff delineated on the HCS, as well as outside of the building yard, within the L'Enfant right-of-way. Because GSA indicates that it will further develop the master plan for this area, staff reiterates that the applicant should submit the Master Plan to NCPC for review and approval prior to submitting the preliminary phase of this project to resolve discrepancies.

National Environmental Policy Act

The current submission, as a concept design proposal, does not require the Commission to complete its NEPA determination at this stage of project review. However, based on the information supplied by GSA, that agency has identified the action as a Categorical Exclusion determination in accordance with GSA requirements. Staff reminds GSA that the Commission's NEPA procedures do not have a categorical exclusion for perimeter security within public space, and therefore, an environmental assessment will be required with the project when it is submitted for preliminary review.

GSA determined its earlier concept submittal for September 1, 2005 Commission review as a Categorical Exclusion in accordance with GSA requirements. However, the previous concept design did not include a security pavilion projecting beyond the building envelope and street wall into the deep site set back from C Street.

National Historic Preservation Act

GSA wrote to the DC SHPO on September 13, 2007 to inform the office that GSA was in an initial design phase for the modernization of FOB 8. GSA requested the DC SHPO's opinion on the eligibility of the building, which was designed by Naramore, Bain, Brady, and Johanson Architects and Engineers of Seattle, Washington. It was constructed between the years 1961-1965.

Under the general regulations of the National Register of Historic Places, buildings are not eligible for listing if they are less than 50 years old. If they are not eligible, they are not subject to further review under Section 106 of the National Historic Preservation Act. However, federal agencies also have a responsibility under Section 110 of the NHPA to evaluate its buildings to determine their eligibility.

Nationwide, GSA and other federal agencies have been undertaking these steps to survey, evaluate, and protect buildings of the Modernist era--the next stylistic architectural era that is reaching 50 years in age. GSA, in fact, has taken the lead in working with the National Register and SHPOs around the country to convene scholarly conferences, undertake research, interview architects of the era, and to survey its Modernist buildings to assess their significance and eligibility. In Washington, GSA has worked with the DC SHPO and the DC Preservation League, among others, to study and assess Modernist buildings, many of which were built by the government—either as office buildings or in partnership with private developers in the urban renewal areas, most importantly in Southwest. This major initiative is underway and will continue for several years.

GSA's letter to the DC SHPO determined that FOB 8 is not eligible for listing in the National Register and is therefore not subject to further review by the DC SHPO under Section 106 of the NHPA. The DC SHPO gave a preliminary opinion that concurred with GSA's assessment but has not yet concluded its study of the building's significance in relation to other Modernist buildings in the Southwest Federal Center. Part of the assessment of the building's significance and character-defining features will involve an assessment of its setting, including the characteristic setback of a building of this era on its site.

The SHPO and the Commission staff note that GSA's September 13, 2007 determination of no effect for the alteration and modernization of the building itself does not take into account the full scope of the undertaking because it makes no mention of the possible effect of the security elements on the L'Enfant Plan: the proposed *projecting security screening pavilion* on the C Street façade as well as the lines of *bollards and planters at the sidewalk curb surrounding the building on all four sides*. Staff recommends that GSA consult on the effects of the full scope of the undertaking with the DC SHPO and others. GSA has not defined the Area of Potential Effect (APE) for the undertaking.

The staffs of the Commission, the DC SHPO, and the Commission of Fine Arts have attended earlier meetings in which GSA's Master Plan for Urban Improvements at 3rd and C Streets, SW have been discussed. The Master Plan is essentially a streetscape plan for security barriers and some street furniture amenities in a four-block area of buildings controlled by GSA; FOB 8 is one of the four buildings. The streetscape plan is subject to Section 106 review as well as review by DC's public space committee and DDOT.