

STAFF RECOMMENDATION



Saum

NCPC File No. MP211/6929

DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION MASTER PLAN MODIFICATION AND U.S. COAST GUARD HEADQUARTERS

St. Elizabeths West Campus
2700 Martin Luther King Jr. Avenue, SE
Washington, D.C.

Submitted by the General Services Administration

December 30, 2009

Abstract

The General Services Administration has submitted the U.S. Coast Guard Headquarters building and the West Ravine Parking Garage, both of which are part of Phase I of the approved Master Plan for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths West Campus. Gate 4 and the proposed access road between Gate 4 and Firth Sterling Avenue, the power plant and the security perimeter are also part of Phase I but are not included in this submission. The headquarters building is a 1.170 million square foot office building that will house 3,860 employees. The parking garage will provide 1,973 parking spaces, of which 983 will be for employees of the U.S. Coast Guard. The remainder will be for staff of the Department of Homeland Security Headquarters. Modifications to the Master Plan that were developed through Section 106 consultation are also included in this submission. Modifications include an increase in the size of the footprints of the Coast Guard Headquarters and parking garage, a decrease in the height of the parking garage achieved by building more of it underground, the realignment of Ash Street to accommodate the increase in building footprints, and the relocation of the security perimeter in the area of the historic cemetery. A Record of Decision and a Programmatic Agreement were completed and included in the submission for approval of the Master Plan. A Section 106 Memorandum of Agreement for this project was completed on December 18, 2009, in accordance with the Programmatic Agreement.

Commission Action Requested by Applicant

Approval of Master Plan modifications and of preliminary and final site and building plans, pursuant to 40 U.S.C. § 8722(b)(1) and (d)

Executive Director's Recommendation

The Commission:

Recognizes that the requirement in the Commission action of January, 2009, that the applicant “document that those portions of Shepherd Parkway required for implementation of [roadway improvements as part of] Phase II are available for use... prior to commencement of construction to implement Phase I” is intended to assure that the traffic generated by the St. Elizabeths West Campus will be managed in a manner that does not overwhelm local roadways.

Notes that the Federal Highway Administration has found that there is no feasible and prudent alternative for providing access to the St Elizabeths West Campus other than using portions of Shepherd Parkway and St. Elizabeths West Campus [Section 4(f) properties]; that the General Services Administration, the Department of Homeland Security, the National Park Service and the Section 106 Consulting Parties have engaged in meaningful consultation since the previous Commission action and have made progress on bringing the access road issue toward resolution.

Notes that the Department of the Interior has expressed its conclusion to the Federal Highway Administration “that either the FEIS preferred Alternative I-2 [Shepherd Parkway] or Alternative A.2.B from the Supplemental [FHWA 4(f) Analysis] could provide adequate access to the St. Elizabeths west campus;” that “until there is further analysis of Alternative A.2.B the DOI cannot concur that there is no feasible and prudent alternative to the use of Shepherd Parkway;” “that DOI is aware that after additional study, the FHWA may find that Alternative A.2.B will not provide the necessary access and may chose to move forward with Alternative 1.2;” and that “regardless of which alternative is chosen, DOI believes that further planning to minimize harm to Section 4(f) properties is needed.”

Concludes that planning for access road improvements to the St Elizabeths West Campus is sufficiently advanced that it is likely to conclude promptly and that GSA will resolve the access road issue for design and location in a manner that does not overwhelm local roadways through further analysis, consultation with NPS and with the Section 106 Consulting Parties, and through adoption of effective minimization measures identified through the final 4(f) process; that this process will be linked to completion of the NEPA and Section 106 review to minimize harm to Shepherd Parkway; and that the applicant anticipates that this will occur by March, 2010.

Finds that effective minimization of harm to Shepherd Parkway through the conclusion of the 4(f) process and effective mitigation for harm to Shepherd Parkway and the St. Elizabeths campus are critically important to the overall success of the project.

Finds that the applicant has met the Commission's requirement that “Shepherd Parkway be available for use,” and that all remaining requirements of the previous Commission action necessary to commence construction of Phase I of the Master Plan have been met.

Approves the proposed modifications to the Master Plan for the Department of Homeland Security Headquarters Consolidation.

Approves preliminary and final site and building plans for the U.S. Coast Guard Headquarters Building and the West Ravine Parking Garage, as shown on NCPC Map File No. 83.10(38.00)42937

Delegates to staff the authority to review and approve façade mockups and any modifications to façade details and materials, but requires the resubmission of any modifications to the building massing.

Commends GSA and DHS for their actions to relocate the security perimeter so that the historic cemetery is within the secured boundary of the West Campus, and their commitment to provide regular public access to the cemetery, the Point, and Hitchcock Hall, and for reducing the height of the West Ravine Parking Garage.

Commends DHS, GSA, NPS, and FHWA for working together to find a solution to the access issue.

Requires the applicant to report back to the Commission at the conclusion of the 4(f) process and to submit the design of the St. Elizabeths West Campus access road for Commission approval.

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PROJECT DESCRIPTION

Site

The site of the proposed U.S. Coast Guard Headquarters Building (USCG HQ) is located in the southwest quadrant of the St. Elizabeths West Campus, in an area identified in the Master Plan as Parcel 4. The West Ravine Parking Garage is in an area of the West Campus identified as Parcel 5. The site includes the western slopes of the plateau on which St. Elizabeths was built and a ravine at the southern edge of the plateau. The site is west of the Center Building, south of the historic cemetery, east of I-295 and north of National Park Service (NPS) land known as Shepherd Parkway. The site was formerly occupied by non-contributing warehouse buildings that have been demolished, and by secondary succession growth woodland. The site slopes 36 meters (118 feet) from top to bottom and is visible from Haines Point and from Ronald Reagan Washington National Airport.

Background

The *Master Plan for the U.S. Department of Homeland Security Headquarters Consolidation* (DHS HQ Consolidation) at St. Elizabeths was approved by the Commission on January 8, 2009. The Master Plan will be implemented in phases over a period of eight years. The current submission represents a portion of Phase I. Construction is scheduled to begin in February, 2010 and occupancy is scheduled to occur in March, 2013. The Commission commented favorably on the concept design for the USCG HQ and West Ravine Parking Garage on May 7, 2009. Congress has appropriated a combination of FY 2009 and American Reinvestment and Recovery Act (ARRA) funds for a total construction budget of \$545,136,000.



Approved Master Plan showing the USCG HQ and the West Ravine Parking Garage building footprints

Project Proposal

The current submission includes the USCG HQ and the West Ravine Parking Garage. The USCG HQ will be housed in a 1.170 million square foot office building to be built on a steep embankment just west of the historic Center Building and south of the historic cemetery. The formal building entry will be through a paved courtyard at the top of the slope, across from the west wing of the Center Building. The most dominant element of the building design is a “head-house” that contains the building lobby and executive offices. The lobby façade features a zinc-clad frame and walls clad in native Carderock stone. Remaining elements of the building are more horizontal in nature. The building steps down the hillside and frames a series of courtyards.

The elements of the building that frame the courtyards are two to three stories high along the perimeter and three to five stories high along the facades that face the courtyards. Façade materials include brick and native stone that recall materials used in existing buildings on the site, vegetated “green walls,” and glass and metal curtain walls. The building massing has not changed significantly from the previous submission, but the facade design has been refined.



View of USCG HQ entry area, showing the zinc-clad frame and Carderock stone walls

Since two-thirds of the rainwater that falls on the West Campus drains through the USCG HQ site, the landscaping is designed to contain rainfall for up to a 15-year storm event through the use of green roofs and a landscape designed to dissipate the energy of a storm event and filter the water as it moves down the slopes, thus improving the water quality while relieving pressure on the city’s combined storm and sanitary sewer system. The design of the building’s courtyards is inspired by the geomorphology of the Chesapeake Bay watershed, with the entry courtyard mimicking plant materials and land forms found in the mountains of the Blue Ridge, mid-level courtyards mimicking areas of the Piedmont, and the lowest areas mimicking tidal wetlands and coastal plains. A series of rain gardens step down the hillside along the building’s perimeter. The concept has not changed significantly from the previous submission but the design of the entry and upper courtyards has been refined.

The parking garage has been significantly redesigned since the previous submission. These changes were made to minimize adverse effects to the site through Section 106 consultation. Where in the previous submission the garage had five levels of parking above ground and two below, the design as currently proposed has two levels above ground and five below. A zinc-clad frame on the north façade was eliminated and replaced with an expanded green wall system. The precast structural system originally proposed has been replaced with a poured-in-place system with a larger bay size (30 x 30). The parking garage was originally proposed to be built in two phases, but because of the increased excavation required, the parking garage will now be built in one phase and the building footprint will be slightly larger.

Proposed Master Plan Modifications



Aerial of proposal site showing USCG HQ and Parking Garage building footprints and limits of disturbance

The design guidelines for the USCG HQ, as shown in the approved Master Plan, established a “virtual grade” for the slope on which the USCG HQ was to be built, above which the building height was restricted to no more than two or three stories, depending on location. As a result, the building footprint was divided into modules that stepped down the slope. The modules were grouped compactly, with small courtyards. During development of the concept design, it was determined that expanding the size of the courtyards would allow room for trees planted in the courtyards to grow to a size that would be visible above the roof line of lower modules when viewed from areas such as Hains Point and Ronald Reagan Washington National Airport, thereby reducing the apparent building mass. This was accomplished, in part, by expanding the building footprint to the south, east and west. This required a realignment of Ash Street, which is a contributing historic resource. As noted above, changes in the design and construction method of the parking garage have also resulted in a lower overall building height but a larger building footprint. Together, the site area of the USCG HQ and the parking garage as shown in the Master Plan occupied 11.415 hectares (28.2 acres). The site area of the current proposal is 12.51 hectares (30.8 acres).



Perimeter security barrier line in Master Plan



Perimeter security barrier line as currently proposed

In the approved Master Plan the historic cemetery was located outside the secured perimeter. The security barrier is not part of this submission, but the submission materials include illustrations showing the applicant’s intent to relocate the barrier line so that it parallels the proposed access road, thereby restoring the cemetery to its place as an integral part of the West Campus. DHS has agreed to this change as part of Section 106 consultation efforts to reduce adverse effects to the cemetery and its setting.



Aerial view of current proposal, showing lowered parking garage at the far edge of the site

Development Program

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| Concept Design: | Perkins + Will |
| Design-Build Team: | Clark Design Build, LLC (in partnership with HOK) |
| Total Site Area: | 125,130 square meters/30.8 acres |

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| Construction Budget: | \$351,290,000 appropriated funds/\$193,846,000 ARRA funds |
| Construction Schedule: | Commencement February 2010/Occupancy March 2013 |
| USCG HQ Floor Area: | 109,198 square meters/1,174,972 square feet |
| USCG HQ Population: | 3,714 in the HQ building/146 additional staff in adjacent facilities |
| Parking Garage Floor Area: | 78,996 square meters/850,000 square feet |
| Parking Allocation: | 1,973 total spaces/983 for USCG HQ/990 for DHS HQ (Phase II) |

PREVIOUS COMMISSION ACTIONS

As noted above, the Master Plan for the U.S. Department of Homeland Security Headquarters Consolidation was approved by the Commission on January 8, 2009. The Commission noted that approval of the Master Plan was contingent upon GSA's ability to construct an access road connecting Firth Sterling Avenue, SE to a modified Malcolm X Avenue SE/I-295 interchange through Shepherd Parkway, and required the following as conditions for further approval.

That GSA submit to NCPC for review and approval an Amendment to the Final Master Plan for the Interchange/Access Road Improvements that includes the following:

- An environmental document that complies with the National Environmental Policy Act (NEPA), including a Record of Decision by the Federal Highway Administration with regard to the Malcolm X Avenue, SE/I-295 Interchange, and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency.
- Any modifications to the *Transportation Management Plan* resulting from ongoing analysis of the Interchange/Access Road Improvements.
- Any revisions to the concept design of the modified Interchange or Access Road as a result of NEPA or Section 106 consultation.

That GSA take the following actions prior to commencement of construction to implement Phase I of the Final Master Plan. These actions are consistent with NCPC's Comprehensive Plan for the National Capital, GSA's mission and goals for this project as stated in the Final Master Plan, and GSA's Programmatic Agreement executed on December 9, 2008 to conclude Section 106 review for the Final Master Plan:

- Document that those portions of the Shepherd Parkway required for implementation of Phase II of the Undertaking are available for use; and, in collaboration with DHS and the National Park Service, initiate Section 106 consultation for roadway design in accordance with the Stipulations set forth in the Programmatic Agreement.
- Verify that it has submitted a Phase II prospectus authorization and funding request to Congress, consistent with federal requirements, in accordance with Stipulation I.B.1.c of the Programmatic Agreement, acknowledging that rehabilitation of historic buildings and landscapes in Phase II is essential to mitigate adverse effects to the National Historic Landmark.
- Establish a schedule for ongoing Section 106 consultation with Consulting Parties addressing the East Campus and any Phase I projects currently funded.

- Identify and implement, in collaboration with signatories of the Programmatic Agreement, opportunities and means for the public to have regular access to the Point, the Cemetery, and Hitchcock Hall.
- Collaborate with Consulting Parties and District of Columbia agencies to explore traffic, access and design alternatives for the setting at Gate #1, including follow-on Section 106 consultation in accordance with Stipulation III.C of the Programmatic Agreement; and continue to explore alternatives that designate Gate #2 as the primary entrance to the West Campus.
- Conduct additional Section 106 consultation to evaluate the feasibility of placing the cemetery inside the secure perimeter of the West Campus, in accordance with Stipulation III.C of the Programmatic Agreement and in response to access concerns expressed by the Consulting Parties.

That GSA submit to NCPC for review and approval, an Amendment to the Final Master Plan for the East Campus portion of the DHS Headquarters Consolidation that includes the following:

- An environmental document that complies with the National Environmental Policy Act and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency. Evaluations shall include an assessment of the cumulative effects of the proposed plan in addition to other reasonably foreseeable development for the site and adjacent neighborhood.
- Any modifications to the *Transportation Management Plan* related to ongoing analysis of the East Campus portion of the Plan.
- A *View Shed Analysis* of the impacts of East Campus development, including road widening, on views to the East Campus from Martin Luther King Jr. Avenue, SE and from the Suitland Parkway.
- A *Summary of Planned Amenities*, describing shared use facilities that would be included in the East Campus portion of the proposed federal development that would also be available to the general public.
- A *Construction Staging Plan* that describes the timing, location, and impacts of construction staging areas on the East Campus.

The Commission commented favorably on the concept design for the USCG HQ and West Ravine Parking Garage on May 7, 2009, and reiterated that approval of the Final Master Plan is contingent on the General Services Administration's ability to construct the west access road connecting Firth Sterling Avenue, SE, to a modified Malcolm X Avenue, SE/I-295 Interchange through the Shepherd Parkway.

The Commission recommended that in further development of the design for Phase I, GSA

- Conduct further study of building facades, with particular attention to the northern façade, to provide a level of depth and detail that will reduce the potential for monotony
- Preserve the variety and size of plant materials shown in the concept for the landscape design

- Conduct additional Section 106 consultation to evaluate the feasibility of placing the cemetery inside the secure perimeter of the West Campus, and notes the need of resolution of this issue before the security fence is submitted for approval

The Commission also strongly encouraged GSA to build one or more additional levels of the West Ravine Parking Garage underground, thus reducing its height and bulk.

PROJECT ANALYSIS

Executive Summary

The first issue to be addressed is the conformance of the applicant's response to the previous Commission actions, notably those regarding the availability of Shepherd Parkway for the construction of an interchange linking the new access road with a new interchange at Malcolm X Avenue SE and I-295. Staff finds that "availability" is the standard established by the Commission in its January 2009 action and that sufficient analysis and consultation have occurred for the Executive Director to recommend approval of the current proposal. The remainder of the conditions for construction of Phase I, which includes the USCG HQ and the West Ravine Parking Garage, have been met.

Modifications to the Master Plan included in this submission have all been made in response to concerns raised by NCPC, CFA or by the Consulting Parties during Section 106 consultation, and are considered improvements to the plan. Staff therefore recommends that the modifications be approved.

This project is being construction through a design-build process, meaning that construction of the building foundation will begin while the design of the building envelope is being finalized. The design has been modified to address issues raised by the Commission at the concept review stage, in particular the fenestration, but some decisions remain. The Commission of Fine Arts (CFA) has raised concerns about the design of the "head house," the green walls, and the brick selection, and has requested that full-scale mock-ups of the façades be constructed on site. Staff recommends that the Commission approve the design as submitted and delegate to staff decisions regarding detailing and building materials, but require the resubmissions of any modifications to the building massing.

Previous Commission Action: Shepherd Parkway

While the access road and the interchange are not part of this submission, the Commission action approving the Master Plan notes that approval of the Master Plan is contingent upon GSA's ability to construct an access road connecting Firth Sterling to an improved interchange at the intersection of Malcolm X Avenue SE and I-295 through Shepherd parkway. The Commission action also requires that GSA document that a portion of Shepherd Parkway is available for use for highway purposes, and that Section 106 for the roadway design be initiated before GSA commences construction to implement Phase I. **The Commission included these requirements to assure that the traffic generated by the St. Elizabeths West Campus will be managed in a**

manner that does not overwhelm local roadways. Similar requirements are included in the 2008 Programmatic Agreement for the Master Plan, to which NCPC is a signatory.

The process for determining the availability of land for a roadway project funded through the U.S. Department of Transportation (USDOT) that requires the use of an historic property or public parkland is regulated by Section 4(f) of the Department of Transportation Act of 1966. The construction of the Access Road and Interchange projects will require the use of both a historic property (St. Elizabeths) and parkland (Shepherd Parkway). The 4(f) process includes two phases. The first phase is a determination by the Federal Highway Administration (FHWA) that there is “no feasible and prudent alternative to the use of protected 4(f) properties.” The second phase requires FHWA to conclude that “all possible planning has been done to minimize harm” to the 4(f) properties.

On December 8, 2008, FHWA issued a Section 4(f) Evaluation to the Department of the Interior (DOI) for review and comment. The Evaluation concluded that there is no feasible and prudent alternative to constructing the interchange across a section of the Shepherd Parkway and the St. Elizabeths West Campus, and authorized the use of Shepherd Parkway contingent on the review and approval by FHWA of the design so that the action minimizes harm to the 4(f) properties. On January 23, 2009, DOI responded to FHWA with a letter stating that DOI did not concur with the conclusion and stating that FHWA’s conclusion was based on inaccurate and incomplete analysis. Over the spring and summer, FHWA consulted with National Park Service staff (acting on behalf of DOI), GSA and DHS to develop additional alternatives for analysis.



Alternative I-2 for Malcolm X/I-295 Interchange (FEIS Preferred Alternative) as shown in FEIS

On November 6, 2009, FHWA issued a Supplemental Analysis as an addendum to its previous 4(f) Evaluation to DOI for review and comment, and released a Supplemental Transportation Analysis document for public comment as a prelude to FHWA’s adoption of GSA’s Final Environmental Impact Statement. The addendum evaluated the prudence and feasibility of twelve additional alternatives that minimize or avoid use of Shepherd Parkway. Among these alternatives was one, Alternative A.2.B, which features a ramp from South Capitol Street over I-295 into Gate 4 of the West Campus. FHWA’s analysis of this alternative concluded that it would not be prudent because it would result in unacceptable safety or operational problems. The

overall conclusion of the addendum was to reiterate FHWA's earlier conclusion that there is no feasible and prudent alternative to constructing the interchange across a section of the Shepherd Parkway and the St. Elizabeths West Campus, and authorized the use of Shepherd Parkway contingent on the review and approval by FHWA of the design and related contract provisions.

On December 23, 2009, DOI responded to DOI with a letter stating that DOI **“has preliminarily concluded that either the FEIS preferred alternative I-2 or Alternative A.2.B could provide adequate access to the St. Elizabeths west campus”** and that “additional study is required to make a determination as to whether Alternative A.2.B is, in fact, prudent. Until there is further analysis of Alternative A.2.B., DOI cannot concur that there is no feasible and prudent alternative to the use of Shepherd Parkway, nor can it concur that all possible planning has been done to minimize harm.” The letter also states that **“DOI is aware that after additional study, FHWA may find that Alternative A.2.B will not provide the necessary access and choose to move forward with Alternative I-2. Regardless of which alternative is chosen, the DOI believes that further planning to minimize harm to Section 4(f) properties is needed.”**



Alternative A.2.B as shown in 4(f) Supplemental Analysis

On December 23, NCPC also received a copy of a report dated December 21, 2009, titled “Supplemental Traffic Analysis Results for the Malcolm X Avenue Modification 4(f)” that was prepared at the request of FHWA and NPS. The conclusion of this report states that A.2.B is not a prudent alternative because it would result in failing traffic operations due to unsafe traffic weaving along southbound South Capitol Street, AM peak hour queuing inhibiting northbound movement through the Malcolm X Avenue/I-295 interchange, and PM peak hour queuing that adversely impacts traffic conditions at both the Firth Sterling Avenue/Suitland Parkway interchange and the Suitland Parkway/I-295 interchange.

FHWA guidance on 4(f) states that “planning to minimize harm” consists of “those measures necessary to preserve the historic integrity of the site and agreed to, in accordance with 36 CFR Part 800 [i.e., Section 106] by the FHWA, the SHPO, and as appropriate, the ACHP.” Section 106 consultation for roadway construction was initiated on October 9, 2009. On October 21, 2009, a workshop was held for the consulting parties to collectively explore design alternatives to minimize adverse effects. Two more such workshops are anticipated in January, 2010, and a signed MOA for roadway improvements is anticipated in February, 2010.

“Availability” is not a term of art found in the 4(f) regulations and the Commission may determine for itself whether the progress made to date is sufficient to satisfy the previous Commission action before it grants further approvals. Taken alone, the most conservative interpretation of “availability” is that both phases of 4(f) must have been completed. However, given that both the Programmatic Agreement (PA) and the previous Commission action include the requirement that GSA and FHWA initiate Section 106 consultation for roadway construction before commencing construction of Phase I, and conclude all necessary Section 106 compliance prior to Phase II design completion, it is reasonable to conclude that GSA has complied with the intent of the PA and the previous Commission action.

Given that the General Services Administration, the Department of Homeland Security, and the National Park Service have engaged in meaningful dialog since the previous Commission action and have made progress on bringing the access road issue toward resolution, and that consultation under Section 106 has been initiated and is underway, staff **concludes that planning for access to the St. Elizabeths West Campus is far enough along that it is likely to conclude promptly, and that GSA will resolve the access road issue for design and location in a manner that does not overwhelm local roadways through further analysis, consultation with NPS, and adoption of effective minimization measures identified through the final 4(f) process; and that GSA anticipates that this process will be linked to completion of NEPA and Section 106 review to minimize harm to Shepherd Parkway and the St. Elizabeths Campus, and that this will occur by March 2010.**

Staff therefore recommends that the commission **find that effective and full minimization of harm to Shepherd Parkway through the conclusion of the 4(f) process and effective minimization for other harms are critically important to the overall success of this project, and that GSA has met the Commission’s requirement that “Shepherd Parkway be available for use.”**

Previous Commission Action: Additional Requirements

In addition to the requirements regarding Shepherd Parkway, the Commission action approving the Master Plan requires that GSA take the following actions prior to commencing construction to implement Phase I of the Master Plan. All actions have been completed as noted.

- *Verify that it has submitted a Phase II prospectus authorization and funding request to Congress, consistent with federal requirements, in accordance with Stipulation I.B.1.c of the Programmatic Agreement, acknowledging that rehabilitation of historic buildings and landscapes in Phase II is essential to mitigate adverse effects to the National Historic Landmark.* GSA has received Congressional authorization and appropriations for Phase II design, which include significant rehabilitation of buildings and landscapes as shown in the master plan; and has acknowledged that rehabilitation is essential to mitigate adverse effects of the undertaking.
- *Establish a schedule for ongoing Section 106 consultation with Consulting Parties addressing the East Campus and any Phase I projects currently funded.* GSA has provided Section 106 consultation schedules to Consulting Parties which address the East

Campus and any Phase I projects currently funded. GSA continues to refine and update the schedules and issues such schedules to the Consulting Parties on a monthly basis.

- *Identify and implement, in collaboration with signatories of the Programmatic Agreement, opportunities and means for the public to have regular access to the Point, the Cemetery, and Hitchcock Hall.* In the MOA signed on December 18, 2009, GSA commits to work with DHS to develop a Public Access Program that includes limited, controlled, regular daily access to the West Campus including, at a minimum, the Point, the Cemetery, and Hitchcock Hall, subject to demonstrated public demand.
- *Collaborate with Consulting Parties and District of Columbia agencies to explore traffic, access and design alternatives for the setting at Gate #1, including follow-on Section 106 consultation in accordance with Stipulation III.C of the Programmatic Agreement; and continue to explore alternatives that designate Gate #2 as the primary entrance to the West Campus.* GSA has continued consultation regarding Gates #1 and #2, but has concluded that the designation of Gate #2 would not reduce the size or character of the security of requirements at Gate #1 and does not have the capacity to handle all the traffic from MLK Avenue. The design of Gate #1 has improved significantly, however, as a result of consultation.
- *Conduct additional Section 106 consultation to evaluate the feasibility of placing the cemetery inside the secure perimeter of the West Campus, in accordance with Stipulation III.C of the Programmatic Agreement and in response to access concerns expressed by the Consulting Parties.* The current submission materials document the agreement by GSA and DHS to relocate the barrier line so that the cemetery will be inside the secured perimeter. The proposed modifications to the Master Plan document this change.

The Commission action approving the Master Plan also requires that GSA submit for review and approval an amendment to the Master Plan for the Interchange/Access Road Improvements that includes an environmental document that complies with NEPA, including a Record of Decision (ROD) by FHWA for the Access Road/Malcolm X Avenue SE/I-295 interchange, and with the National Historic Preservation Act. The ROD will include the Supplemental Transportation Analysis, the 4(f) Evaluation and Supplemental Analysis, and a signed MOA. The public comment period on the Supplemental Transportation Analysis is December 23, 2009, FHWA will sign the Supplemental Analysis to the 4(f) Evaluation in early January, and a signed MOA is anticipated in February, 2010. Completion of the ROD is anticipated in March, and the amendment to the Master Plan will be submitted for NCPC approval shortly thereafter.

And finally, the Commission action approving the Master Plan requires that GSA submit to NCPC for review and approval an Amendment to the Master Plan for the East Campus portion of the DHS Headquarters Consolidation that includes a variety of specified elements. No deadline was specified for this submission, but GSA has retained a consultant to develop the Master Plan modification for the East Campus, has met with NCPC, CFA and the DCSHPO on design concepts, and has indicated that a submission for approval will be forthcoming in mid-2010.

Therefore, staff recommends that the Commission find that all remaining requirements of the previous Commission action necessary to implement construction of Phase I of the Master Plan have been met.

Staff also recommends that the Commission commend GSA and DHS for their commitment to providing regular, daily public access to the Cemetery, the Point and Hitchcock Hall.

Master Plan Modifications

As noted above, the proposed modifications to the approved Master Plan include the expanded footprints of the USCG HQ building and the West Ravine Parking Garage and a modification the amount of the garage that will be built underground, the realignment of the Ash Street right-of-way, and the relocation of the security perimeter in the vicinity of the historic cemetery. The proposed modifications have all been made as a direct result of Consulting Party comments made during Section 106 consultation, and reflect either minimization or mitigation of adverse effects to the National Historic Landmark or to the Topographic Bowl as viewed from sites such as Hains Point and Ronald Reagan Washington National Airport. Specifically:

- The larger building footprint of the USCG HQ building is the direct result of larger courtyards that will accommodate larger trees that will, in turn break up the visual building mass and, at maturity, help the building blend in to the tree cover of the Topographic Bowl.
- In its comments on the concept design for the USCG HQ building and the West Ravine Parking Garage, the Commission strongly encouraged GSA to build one or more levels of the garage underground. During Section 106 consultation, NCPC staff also advised GSA that reducing the height of the garage would be the single greatest mitigation for adverse effects to the NHL that could be offered. Although the change in building technology that will make this possible will result in a slightly larger building footprint, the benefits far outweigh any resulting harm. In acknowledgement of the increased cost that will be required to accomplish this change, **staff recommends that the Commission commend GSA for reducing the height of the parking garage.**
- The Consulting Parties recognized that expanding the footprint of the USCG HQ and garage would require the realignment of Ash Street, which is a contributing element of the historic landscape. They agreed, however, that the benefits of breaking up the visual mass of the USCG HQ building outweighed the harm to the landscape.
- The original location of the secured perimeter in the area of the historic cemetery was driven by security requirements that were complicated by the topography. Placing the cemetery outside the secured campus eliminated these complications but would have kept the cemetery from being experienced by visitors as an integral part of the St. Elizabeths campus. It would also have required the permanent removal a significant number of trees that currently comprise the cemetery's wooded setting. Through consultation, NCPC, GSA and DHS staff were able to resolve these issues; but in recognition of the flexibility that was required, **staff recommends that the Commission commend GSA and DHS for relocating the secure perimeter so that the cemetery is within the secured boundary.**

Staff therefore recommends that the Commission approve proposed modifications to the Master Plan for the DHS Headquarters Consolidation.

Building Design Issue 1: Design-Build Process

The USCG HQ and West Ravine Parking Garage are being designed and constructed through a design-build process. The traditional design and construction process, on which NCPC's submission guidelines are based, is known as a design-bid-build process in which construction documents for a fully developed design are completed before a construction contract is let. Under the design-build process, a design team develops what are known as bridging documents that are more fully developed than at the traditional concept or schematic design stage, and another design team, working in partnership with a construction contractor, completes the construction documents while the contractor commences construction. In this case the original design was developed by Perkins + Will and the design is being implemented by Clark Design Building, LLC, working in partnership with HOK. One risk of design-build is that the quality of the execution will not live up to the concept due to "value engineering" during the design-build. Staff is pleased to note that HOK appears to be hewing to the vision created by Perkins + Will.

Building Design Issue 2: USCG HQ Building Facades and Massing

The Commission commented favorably on the concept design submission on May 7, 2009, but recommended that the applicant conduct further study of building façades to provide a level of depth and detail that will reduce the potential for monotony. Staff noted that the simple brick skin with punched windows, particularly along the northern façade of the building facing the cemetery, appeared to be limited in depth that would create shadows and did not yet show the level of detailing that would keep the façade from being flat and monotonous. The designers have responded by introducing a pattern of fenestration that incorporates horizontal bands of windows that are punctuated by vertical accents with spandrel glass. Details of the window openings show them to have a depth—approximately 15"—that will create a pattern of light and shade, highlighted by broad horizontal and vertical louvers.



View of USCG HQ building from historic cemetery (without plantings) showing modified façade

Staff is generally supportive of the materials selected but notes that some of the materials may change as a result of further consultation requested by the Commission of Fine Arts (CFA) in their review of the proposal on November 19, 2009. In particular, CFA expressed concern regarding the green wall system used on the USC HQ building, and suggested that a more

uniform brick selection might be more in keeping with the historic materials used elsewhere on the campus. CFA requested an on-site mockup showing representative sections of the major exterior cladding to establish design intent as part of the final review process. Staff therefore **recommends that the Commission approve the design as submitted and delegate to staff the authority to review and approve façade mockups and any modifications to façade details and materials, but require the resubmission of any modifications to the building massing.**



View of upper courtyard looking north from Parking Garage, showing head house and green walls

Building Design Issue 3: USCQ HQ Landscape Design Concept

In its comments on the concept design, the Commission recommended that the applicant preserve the variety and size of plant materials shown in the concept. At that time, staff noted that the relatively low building height and the fact that portions of the courtyards are at existing grade will allow future development of a tree canopy that will exceed the height of the surrounding walls and become visible at a distance, allowing the building to blend in to the surrounding landscape of the Topographic Bowl. While the design-build process makes it difficult to assure the size of plant materials that will be used, staff reiterates its opinion that the design-build team appears to be conforming to the intent of the original design, and finds that modifications to the original design included in this submission are refinements to the original concept, not departures from it.



Upper Courtyard from Concept Design



Upper Courtyard as Currently Proposed

Design Issue 4: West Ravine Parking Garage

The parking garage, which was originally proposed to have five stories above ground and two underground is now proposed to have five stories underground and two above ground, thus reducing its height and bulk and reducing its visibility and prominence relative to the building it serves. As noted in comments on modifications to the Master Plan, this is considered by staff to be a major mitigation for other adverse effects. In addition, the design has eliminated the zinc frame on the western façade. This element is a defining feature of the head-house, and staff supports its elimination from this more utilitarian structure. Staff therefore **recommends that the Commission approve the design of the West Ravine Parking Garage.**



Western Façade from Concept Design



Western Façade as Currently Proposed

CONFORMANCE

Comprehensive Plan for the National Capital

Staff has evaluated the concept for the USCG HQ for conformance with five of the seven Federal Elements of the Comprehensive Plan: the Federal Workplace, Transportation, Parks and Open

Space, Federal Environment, and Preservation and Historic Features elements. In summary, staff finds the project to be in conformance with the goals and policies associated with each Element.

Federal Workforce Element: The Federal Workplace Element encourages the federal workforce to be located within the District of Columbia to enhance the efficiency, productivity, and public image of the federal government; to strengthen the economic well-being and expand employment opportunities of the region and the localities therein; and to encourage federal agencies and communities to work together to improve operational efficiency and productivity of federally owned and leased workplaces and the economic health and livability of communities within the region. The construction of the USCG HQ will retain approximately 4,000 federal employees currently working in the District of Columbia by relocating them from leased to federally owned space. This project is therefore in conformance with this Element.

Transportation Element: The Transportation Element promotes a balanced, multi-pronged strategy to maximize federal employees' and facilities' access to the region's extensive transit system. The policies of this element address parking at federal facilities, impacts to the local and regional traffic/transit networks, and transportation management. The Final Master Plan submission conformed to the *Parking*, *TMP*, and *TDM* policies of the Comprehensive Plan by including a fully developed Transportation Management Plan, including commitments for extensive use of public transportation (35% Metro to 42% commuter bus – Metro combination). The USCG HQ will conform to the Comprehensive Plan parking ration of 1:4 by providing approximately 1,000 parking spaces for approximately 4,000 employees.

Parks and Open Space Element: The Parks and Open Space Element establishes policies to protect, enhance, and expand the region's parks and open space system, and to protect the forested ridgelines of the topographic bowl that surrounds the District. By reducing the above-ground development and limiting building heights, the Final Master Plan strives to reduce the impacts to important green spaces and the visual qualities they provide. The Design Guidelines included with the Final Master Plan were written to improve conformance with this element. Concept designs for the USCG headquarters building exhibit GSA's commitment to preserve open space and the green topographic bowl as much as possible by reducing the monolithic appearance of the building and by integrating the structure into the wooded hillside to a greater degree than that depicted in the Final Master Plan; and by keeping the roofs below the ridgeline.

Federal Environment Element: The Federal Environment Element promotes the federal government as an environmental steward and identifies the Commission's planning policies related to the maintenance, protection, and enhancement of the region's natural environment. The USCG HQ includes measures for stormwater management techniques to reduce or eliminate runoff into the local rivers. Building plans would incorporate green roofs, local materials, and other sustainable materials and methods to achieve at least a LEED Silver certification.

Preservation and Historic Features Element: The Preservation and Historic Features Element helps to strengthen the significant architectural and planning character that makes the national capital a unique place, including protection of the topographic bowl (see Parks and Open Space Element above). There are several measures identified in the Programmatic Agreement, which concluded Section 106 consultation for the Master Planning phase of the project, that are consistent with the objectives of the Preservation and Historic Features Element of the

Comprehensive Plan as well as with Section 110 (f) of the National Historic Preservation Act (see *National Historic Preservation Act* section, page 40).

The Final Master Plan includes extensive rehabilitation and preservation of nearly all of the contributing buildings and a large number of contributing landscape features extant on the site. Nevertheless, GSA has determined that the undertaking would cause adverse effects to the National Historic Landmark. Staff has concurred with this determination throughout the Section 106 consultation process. The executed Programmatic Agreement is intended to address these adverse effects as carefully and comprehensively as possible, and recognizes the need to balance the project's operational requirements with appropriate treatments of the NHL; but the proposed alterations to the setting of the National Historic Landmark mean that the policies of this Element would not be fully met.

Federal Capital Improvements Plan

The Federal Capital Improvements Program for 2010-2015, adopted by the Commission on September 3, 2009, shows the St. Elizabeths Hospital West Campus DHS Consolidation project as Recommended and Strongly Endorsed. According to information provided in the current submission, \$545,136,000 has been appropriated for the construction of this project, of which \$193,846,000 represent ARRA funds. The total budget estimate for the DHS HQ Consolidation between FY 2010 and FY 2015 is \$1,361,500. The total budget estimate for related infrastructure improvements is \$285,800,000.

Relevant Federal Facility Master Plan

With the incorporation of the currently proposed modifications to the Master Plan, staff finds that the current submission is in conformance with Final Master Plan for the DHS Consolidation at the St. Elizabeths West Campus. Building heights and density conform to the standards for new construction included in the *Preservation, Design and Development Guidelines*, and the programmatic requirements regarding gross square footage and number of employees conform to the Master Plan. The landscape design conforms to the goals identified in the Master Plan of removing alien invasive plants and reestablishing biodiversity, and storm water will be managed in conformance with the Master Plan's principles.

National Environmental Protection Act (NEPA)

Pursuant to the requirements of NEPA, GSA, in cooperation with DHS, NCPC, FHWA, and the District Department of Transportation, prepared an Environmental Impact Statement (EIS) for the St. Elizabeths Final Master Plan. The Final EIS (FEIS) was issued by GSA on November 7, 2008 and, following receipt of public comments that were due on December 8, 2008, GSA issued its Record of Decision on December 16, 2008. The current proposal for the USCG HQ is consistent with the Environmentally Preferred Alternative as identified in the FEIS.

The EIS included consideration of alternatives for the USCG HQ and associated projects and their impacts on the 176-acre federal campus. GSA made the draft EIS available to the public for

a 90-day public comment period and circulated the FEIS for a 30-day review period starting November 7, 2008. GSA completed a review of comments and concluded its NEPA work on December 16, 2008 with a Record of Decision (ROD).

NCPC is a federal agency with its own NEPA obligations set forth in its Environmental and Historic Preservation Policies and Procedures. NCPC participated as a Cooperating Agency in GSA's development of its EIS, and NCPC provided comments on the draft and final documents. The FEIS was also made available to the Commission members. NCPC's Executive Director adopted GSA's FEIS under NCPC and Council on Environmental Policy procedures, and in conjunction with this report, has satisfied NCPC's independent NEPA obligations.

NCPC is, in this EDR, using the GSA Final EIS for the St. Elizabeths Final Master Plan to inform its review of and recommendations for the USCG HQ. NCPC is also monitoring GSA's implementation of its impact mitigation commitments through its review under the National Capital Planning Act. A summary of the environmental considerations, as required by NEPA Regulations, 40 CFR 1505.2, and NCPC's conclusions regarding the Final Master Plan, including the USCG HQ, was included in the Executive Director's Recommendation for the Final Master Plan dated December 31, 2008.

National Historic Preservation Act (NHPA)

Staff notes for the Commission that the design development of the Coast Guard headquarters and the parking garage have achieved a notable minimization of anticipated adverse effects through improvements in the proposed massing, footprint, landscape setting, and materials and surface treatment of the headquarters building; the reduction in the above-grade height of the parking garage; and the revised placement of the security barrier to the perimeter of the site so that the cemetery remains an integral feature of the historic campus. Staff commends the applicants and their design and consultant teams for these minimization measures, among others, achieved through project development and Section 106 consultation during the past year.

GSA has served as lead federal agency for Section 106 compliance throughout the investigation and development of the undertaking on the St. Elizabeths campus. In December 2008, prior to the Commission's January 2009 action on the St. Elizabeths Master Plan, a Programmatic Agreement (PA) was executed. The PA addressed the effects of the overall development proposed for the site, a National Historic Landmark, and established the process for further consultation on individual projects to come. It was anticipated that each subsequent development project or phase would be the subject of a Memorandum of Agreement (MOA).

The first MOA pursuant to the PA was executed on December 18, 2009 by GSA, the Advisory Council on Historic Preservation, the District of Columbia State Historic Preservation Office, the National Capital Planning Commission, and the U.S. Department of Homeland Security. The MOA is specific to the proposal before the Commission: a 30.91-acre site within the West Campus for the new U.S. Coast Guard (USCG) Headquarters, including construction of a 1.2 million gross square feet (GSF) facility, a 860,000 GSF parking garage, site work in the immediate vicinity of the headquarters building and garage, protection and rehabilitation of

cultural landscape features, and the location of the security perimeter in the vicinity of the cemetery.

Some aspects of the current proposal require modifications to the Master Plan approved by the Commission in January 2009; these modifications have come about through ongoing Section 106 consultation to minimize the adverse effects of the undertaking, and were advocated for or agreed to by the consulting parties and signatories.

The MOA contains measures to minimize or mitigate the adverse effects of the undertaking, which have been the subject of intensive consultation with consulting parties for the past year. The consulting parties include preservation, planning, and citizen groups, in addition to the relevant federal and District of Columbia agencies.

The consultation has also included related undertakings that will be the subject of future MOAs, including one to address the effects of the proposed Shepherd Parkway access road, and one to address the effects of the design and location of perimeter security around the campus. Additional future MOAs are contemplated as the phases and components of the Master Plan are designed and developed further. The future Master Plan for the DHS site on the East Campus will also be the subject of a future MOA.

Further, GSA has already presented to the consulting parties and posted on the project website preliminary findings on the physical condition and proposed rehabilitation of the historic buildings on the campus, as well as the findings of a detailed examination of the cultural landscape and recommended actions to protect and rehabilitate landscape features.

The 2008 PA set forth conditions to be met before Phase I construction could commence, including documenting that portions of Shepherd Parkway are available for use, that a final 4(f) determination by FHWA was made, that GSA and FHWA initiate Section 106 consultation for roadway design and construction, and that GSA verify that a Phase II prospectus authorization and funding request to Congress be submitted for the significant rehabilitation of buildings and landscapes as shown in Phase II of the Master Plan (including the Center Building and many of the surrounding buildings). After consultation, the signatories have agreed on the conditions being satisfied to the degree set forth in the MOA, including FHWA's Supplemental Section 4(f) Evaluation with its conclusions and contingencies, the initiation of Section 106 review of roadway design and construction, and the receipt of congressional authorization and appropriations for Phase II design. Section 106 review of an access road through Shepherd Parkway is continuing, with the resolution of effects in a separate MOA anticipated for February 2010, prior to project review by the Commission.

The 2009 Coast Guard MOA establishes the measures by which GSA will ensure that the undertaking is carried out, so that the development of the site is compatible with its historic character and exceptional significance, balanced with meeting the programmatic, security, functional, and operational needs of DHS. Other governing documents include the Master Plan; the PA for the Master Plan; the Preservation, Design, and Development Guidelines; the Landscape Preservation Treatment and Management Plan; the Archaeological Resources Management plans, and the Secretary of the Interior's Standards.

GSA is responsible for the ongoing stabilization, maintenance, upkeep and protection of contributing landscape features on the site during all construction activity. Among notable landscape features, the cemetery is one of the most significant. The MOA stipulates that the perimeter security fence surround the site from outside the cemetery, so that the cemetery remain physically related to the historic campus. The cemetery and related and nearby landscape features will be protected during construction of the Coast Guard facility.

While public access to the site during construction may be affected, GSA and DHS have committed in the MOA and pursuant to further development of a public access program, to “limited controlled, regular daily access to the West Campus, including, at a minimum, the Point, the Cemetery, and Hitchcock Hall, subject to demonstrated public demand for such access” once construction is completed. Access will be scheduled in advance and will be subject to provisions for identification and screening, and for circumstances related to elevated threat conditions, similar to public access provisions for other Level 5 ISC facilities.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its December 16, 2009 meeting and forwarded it to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were NCPC; the National Park Service; the General Services Administration; the District of Columbia Office of Planning, Department of Transportation, and Fire and Emergency Medical Services.

Commission of Fine Arts

In its meeting of November 19, 2009, the Commission of Fine Arts reviewed the final design documents for the proposed project. The Commission approved the final design with conditions regarding the treatment of the exterior of the building. Those conditions include modifying the vertical articulation of the head-house so that it is less obtrusive; reducing or eliminating the use of the panelized green-wall system on the USCG HQ building, which they thought appeared flimsy; required the presentation of an on-site mockup showing representative sections of the major exterior cladding assemblies to establish design intent; recommended the elimination of Cor-Ten steel in the landscape courtyards; and requested a study of night lighting on the building to assess its impact on the context of the city. A copy of the Commission’s letter to the General Services Administration dated November 30, 2009 is attached.

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2100 FAX 202-504-2195 WWW.CFA.GOV

30 November 2009

Dear Mr. McGill:

In its meeting of 19 November, the Commission of Fine Arts reviewed the final design documents for the proposed U.S. Coast Guard headquarters facility on the St. Elizabeths West Campus. The Commission acknowledged the difficulty in resolving the design of the 1.4-million-square-foot building on this sensitive hillside site and commended the General Services Administration (GSA) for its efforts in responding to the Commission's concerns from the last review in April 2009. The Commission approved the final design with conditions regarding the treatment of the exterior of the building as noted below.

Acknowledging the need to break down such an immense project into pieces, the Commission members noted that the approach of modulating the building as many smaller elements and layers may be carried too far given the great scale of this project. They commented that the overall building design is generally successful in its horizontal articulation and proposed materials, but noted that there are instances where the layered complexity of the facades may detract from the architecture. In particular, the members characterized the vertical articulation of the prominently framed volume at the uppermost part of the building as incongruous; it should be modified to be less obtrusive in keeping with the horizontal spirit of the entire complex. They also suggested that the panelized green-wall system, clipped on to some surfaces of the upper volumes of the building, appears flimsy and may be one layer too many in the composition; they recommended reducing or eliminating the use of this system in the design.

The Commission members complimented GSA for its willingness to consider the use of new materials and systems which may have unusual maintenance requirements. They supported the use of the metal mesh fins on the office complex, suggesting that these could be made more dense in pattern to increase energy performance. They also supported the use on the garage of the mesh green-screen system, which they commented has ample precedent as a means of softening the visual impact of that immense structure. In their discussion, the Commission members considered the proposed materials on the building and cautioned that the design-build process inherently creates a risk of losing in construction what is presented as a design. Given the design-build process and the absence of prior review of the selection of cladding materials, the Commission required that an on-site mockup showing representative sections of the major exterior cladding assemblies be presented to establish design intent as part of the final review process.

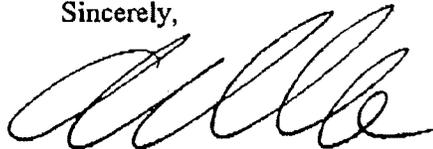
Regarding the design of the site, the Commission members continued to raise concerns about the movement of thousands of workers through this complex, not only in the Coast Guard headquarters, but between the garage structure and the historic campus on the

hilltop. They recommended that amenities such as food service and other convenience retail be provided within the campus and, as appropriate, within the large Coast Guard building. While they reiterated their support for the landscape design of the courtyards as a means to improve the experience of working in and moving through the complex, they recommended the elimination of the metal retaining walls proposed throughout the courtyard gardens, as they found Cor-Ten steel to be an extraneous additional material unrelated to the palette of the entire project.

Given the great prominence of the site within the larger composition of Washington, the Commission requested a study of night lighting on the building to assess its impact on the context of the city—particularly when seen from a distance, as this is the primary way most people will experience this facility.

In its action, the Commission members included these comments as conditions that must be addressed to complete the final approval process. They look forward to the review of the mockup as well as documentation of redesign of the cladding systems at the upper volume of the building, including the west-facing vertical element and the use of the green-wall panel system. As always, the staff is available to assist you with future submissions.

Sincerely,



Thomas E. Luebke, AIA
Secretary

Michael McGill
Special Assistant for Regional Coordination
National Capital Region
U.S. General Services Administration
301 7th Street, SW Room 7600
Washington, DC 20407-0001

cc: John R. Lowe, WDG Architecture
William Hellmuth, HOK