

# STAFF RECOMMENDATION



Dettman

NCPC File No. 6611

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## FEDERAL OFFICE BUILDING 8 SITE IMPROVEMENTS AND PERIMETER SECURITY

200 C Street, SW  
Washington, DC

Submitted by the General Services Administration

February 25, 2010

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### Abstract

The General Services Administration (GSA) has submitted preliminary and final site development plans for site improvements and perimeter security at Federal Office Building 8 (FOB 8), located at 200 C Street, SW. The proposal replaces the existing surface parking lot located along the north side of the building with a landscaped entrance plaza containing recycled glass pavers, seat-wall planters, and sculptural lawn mounds. At the northeast corner of the plaza, a new glass and stone guard booth will be constructed adjacent to an existing underground parking garage and loading dock entrance. Perimeter security is proposed on all four sides of the building, and is located within the building yard or inside the sidewalk along the north and west sides, and at the curb along the south and east sides. The proposed perimeter security utilizes a variety of hardened street furnishings such as benches, bike racks, bollards, streetlights, garden walls, newspaper boxes, and trash receptacles. Extensive landscaping along all four sides of the building has been proposed in order to help soften the appearance of the security elements, as well as minimize and mitigate their effect on the historic L'Enfant Plan. This project is a component of GSA's larger initiative to convert FOB 8 from laboratory space into office space for use primarily by Legislative Branch staff. At its January 2010 meeting, the Commission approved, by consent, the building renovation portion of the FOB 8 initiative.

### Commission Action Requested by Applicant

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

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## Executive Director's Recommendation

The Commission:

**Approves** the preliminary and final site development plans for site improvements and perimeter security at Federal Office Building 8, located at 200 C Street, SW, as shown on NCPC Map File No. 1.72(38.40)42958.

**Commends** the General Services Administration for its commitment to developing a project with such a high degree of sustainable benefits.

**Notes** that the General Services Administration worked with NCPC and other federal and local agencies in order to ensure that the proposed perimeter security is successfully integrated into the urban landscape, and impacts to the visual and functional quality of surrounding public space is reduced to the greatest extent possible.

**Notes** that NCPC and GSA have agreed that development of a formal master plan for the 3<sup>rd</sup> and C Street area would require detailed, site specific information that currently is not available, and therefore, more conceptual urban design guidelines, such as those contained in GSA's "3<sup>rd</sup> and C Street Urban Design Guide" are more appropriate for guiding future site improvements and perimeter security projects at the Cohen, Switzer, and Humphrey Buildings.

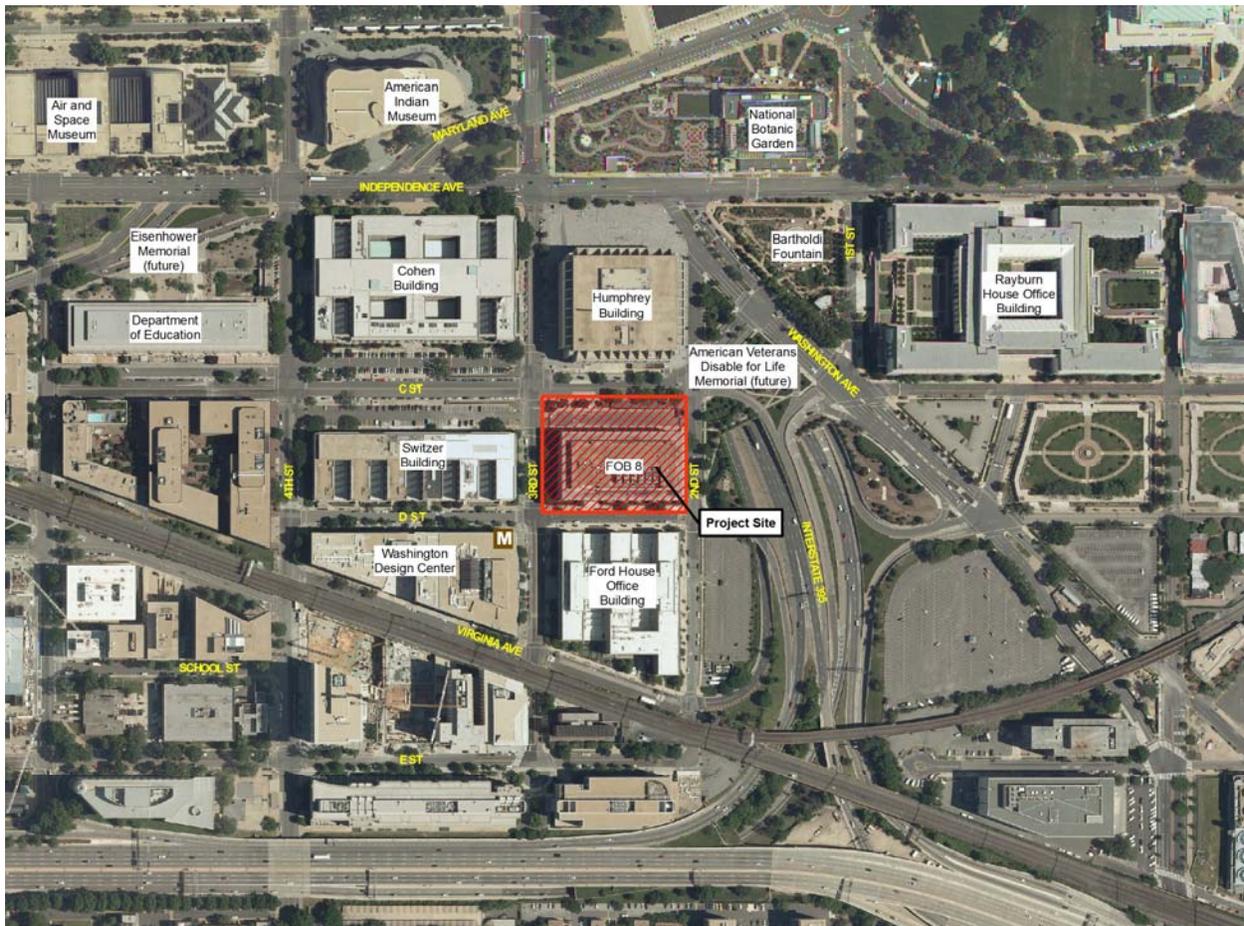
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## PROJECT DESCRIPTION

### Site

Federal Office Building 8 ("FOB 8", "the Project Site", "the Site") occupies an entire city block within the Southwest quadrant of Washington, DC. The area in which the site is located is commonly referred to as the Southwest Federal Center. FOB 8 is bounded by C Street to the north, D Street to the south, 2<sup>nd</sup> Street to the east, and 3<sup>rd</sup> Street to the west. The building is setback approximately 75 feet from its northern property line, creating a front yard area that currently serves as a 60 vehicle surface parking lot. Along 3<sup>rd</sup> Street the distance between the building and the property line is slightly more than five feet; the building is constructed to the property lines along 2<sup>nd</sup> and D Streets. An entrance to the building's underground parking garage and loading dock is located partially in public space at the northeast corner of the property. Other existing building features located within public space include a sunken courtyard along 3<sup>rd</sup> Street, and areaways along D Street. The project site is primarily surrounded by federal office buildings. To the north is the Humphrey Building, headquarters to the Department of Health and Human Services. The Switzer and Cohen Buildings are located to the west and northwest respectively. The Washington Design Center and entrance to the Federal Center Southwest Metrorail station are located approximately 150 feet southwest of FOB 8, and the Ford House Office Building is located directly south. Finally, to the east of 2<sup>nd</sup> Street is the future site of the American Veterans Disabled for Life Memorial, and an entrance ramp to I-395. Also located within two blocks of

the project site are the National Mall, National Botanic Garden, and the site of the future Eisenhower Memorial.



Project site and surrounding context

### Background

FOB 8 was originally constructed in 1965 for use as laboratory space by the U.S. Food and Drug Administration (FDA). This Modernist-style building was designed by Naramore, Bain, Brady and Johnson Architects and Engineers, and is characteristic of many modern buildings that were constructed during the same time period, a particular characteristic being its significant setback from C Street. The building is 78 feet high with eight levels: a basement, ground-level, and six above-grade stories. In 2002, the FDA vacated the building and the General Services Administration (GSA) initiated the process of converting the building from laboratory space to office space suitable for use by federal agencies.

At its September 2005 meeting, the Commission commented favorably on GSA's first concept design for the modernization of FOB 8. In general, the project consisted of converting the former laboratory space to office space, replacing the existing building façade with a glass curtain wall, and making several alterations to the project site including the transformation of the northern surface parking lot into a public plaza, and the integration of perimeter security into the overall landscape design.

In 2007, GSA submitted a revised concept design for the modernization of FOB 8. In addition to the renovation of the building and improvements to the site, this revised design included perimeter security around all four sides of the building, located primarily within public space under the jurisdiction of the District of Columbia. GSA's revised concept submission also indicated that upon completion of the project, the primary tenant of the building would be Legislative Branch staff. At its October 2007 meeting, the Commission reviewed, and commented favorably on a revised concept design for the modernization of FOB 8, but commented unfavorably on the proposed security screening pavilion and perimeter security elements. The basis for the Commission's unfavorable comments was that the perimeter security intruded upon the public right-of-way on all four sides of the building caused in part by the size of the proposed screening pavilion. Following its review, the Commission required GSA to: reduce the size and scale of the pavilion to minimize its impact to the building's setting; conduct a security analysis carried out in accordance with NCPC's Urban Design and Security Plan Objectives and Policies; and submit its 3<sup>rd</sup> and C Street Master Plan for review and approval prior to submitting the FOB 8 project for preliminary review.

At its January 2010 meeting, the Commission approved the preliminary and final building plans for the renovation of FOB 8, and noted that site improvements and perimeter security would be submitted at a later date. Furthermore, the Commission noted that although its previous action requested that the 3<sup>rd</sup> and C Street Master Plan be approved by NCPC prior to GSA submitting preliminary and final plans for the FOB 8 project, NCPC staff and GSA have since agreed that development of a formal master plan for the 3<sup>rd</sup> and C Street area would require detailed, site specific information that currently is not available, and therefore, more conceptual urban design guidelines, such as those contained in GSA's "3<sup>rd</sup> and C Street Urban Design Guide" are more appropriate for guiding future site improvements and perimeter security projects at the Cohen, Switzer, and Humphrey Buildings. The current proposal for site improvements and perimeter security at FOB 8 is consistent with these guidelines and is a product of extensive consultation with NCPC and other federal and local agencies.

### Proposal

The proposed site improvements and perimeter security at FOB 8 is a component of GSA's initiative to renovate and modernize the existing building, originally constructed as laboratories for the FDA, into high-quality office space. The site improvements include the replacement of a surface parking lot with a landscaped plaza, and extensive landscaping along all four sides of the building both within the building yard and in public space. All improvements to public space have been coordinated with the District of Columbia and meet or exceed local guidelines and regulations. This includes the choice of paving material, tree box dimensions, sidewalk width, street furnishing design, and sustainable requirements. Despite being designed to meet a K-12 rating, the perimeter security has been successfully integrated into the building and proposed site improvements. Along C and 3<sup>rd</sup> Streets, where the building yard is greater than 20 feet, the security elements have been located inside the sidewalk. Along 2<sup>nd</sup> and D Streets, where the building yard ranges between zero and five feet, security elements have been located along the curb. The proposed perimeter security plan avoids the repetitive use of one security element. Instead, the plan employs a variety of streetscape furnishings such as seatwall planters, garden walls, benches, bike racks, bollards, streetlights, newspaper boxes, and trash receptacles.

Bollards within this particular perimeter security plan are 3'3" in height, 11" in diameter, and spaced 4'11" on-center. The proposed bollard spacing provides 4 feet of clear walking clearance between elements.



Proposed site improvements and perimeter security

The key element of the site improvements is a new landscaped plaza along C Street. The plaza will replace an existing surface parking lot and serve as a welcoming entry forecourt to FOB 8. The pedestrian entryways into the plaza are located on 2<sup>nd</sup>, 3<sup>rd</sup>, and C Streets. The entry on C Street is centered on the new glass-enclosed security pavilion.<sup>1</sup> The entrances along 2<sup>nd</sup> and 3<sup>rd</sup> Streets lead pedestrians into the space towards the entry pavilion, and provide another east-west passage in lieu of the narrow sidewalk condition that exists along C Street. Each entrance is marked by a low, oval planter. Along the south side of the plaza, seatwall planters will extend the length of the north building façade on either side of the pavilion. The planters will contain perennials, ground covers and deciduous trees. Along the north side of the plaza, sculptural lawn mounds with ornamental trees will provide a softer edge to the plaza and informal seating. Paving for the plaza will consist of exposed aggregate concrete, consistent with what will be used throughout the surrounding public space, accented with bands of green recycled glass pavers.

<sup>1</sup> The security pavilion was approved by the Commission at its January 2010 meeting as part of the modernization of the existing building.



Perspective showing landscaped plaza along C Street

Perimeter security around the three sides of the plaza is provided primarily within the building yard. Along C Street, security elements will include a hardened outside parapet wall of the existing garage ramp, located within public space, and a series of garden walls separated by narrow pedestrian pathways (Image A). The garden walls will be composed of precast concrete with a limestone veneer, to match the

building, with a powder-coated steel top railing. They will be buffered along the sidewalk by low planting beds. Five bollards will cross the main pedestrian path leading to the entry pavilion, and will be finish in the same manner as the garden walls. Both the garden walls and the bollards will be located within the building yard.

Security along the 3<sup>rd</sup> Street side of the plaza is partially provided by the large, oval planter that has been hardened and designed to match the garden walls along C Street. The remainder of the security line along this side of the plaza is composed of two bollards on either side of the oval planter, and a continuation of the seatwall planter that wraps around the northwest corner of the building and continues along 3<sup>rd</sup> Street (Images B, C, and D). Security along the east side of the plaza is provided by four retractable bollards across the garage entrance and four additional bollards that transition to the curbside security elements along 2<sup>nd</sup> Street. In addition, a new guard booth is proposed at the northeast corner of the project site next to the garage ramp. The booth will be hardened and constructed of glass and stone similar to the entry pavilion (Image E).

The perimeter security along 3<sup>rd</sup> Street has been successfully integrated into the proposed site improvements of the building yard. The seatwall planter that wraps around the northwest corner of the building will become a hardened garden wall backfilled with a variety of shrubs, perennials, and groundcovers. The garden wall will be topped with a connecting guard rail (Image D). Further south along this side of the building, the existing parapet wall and guardrail of the sunken courtyard will be reconstructed and hardened (Image F). Similar to C Street, the 3<sup>rd</sup> Street security elements are located within the building yard and have been designed to relate to the architecture of the building.

Due to the lack of a building yard, the perimeter security along 2<sup>nd</sup> and D Streets is proposed to be located along the curb (Images G and H). Generally, the security elements will be setback two feet from the edge of the curb except for where existing Metrorail ventilation shafts require the elements to be setback approximately 6 feet from the curb. The security elements along 2<sup>nd</sup> and

D Streets consist of a variety of hardened streetscape furnishings such as benches, bike racks, bollards, streetlights, garden walls, newspaper boxes, and trash receptacles. Since these elements are located within public space they have been designed to relate to the surrounding urban context and will be of a consistent dark color to help blend in with the extensive landscaping proposed.



A: Garden walls along C Street



B: Garden wall and bollards at 3<sup>rd</sup> and C Streets



C: Oval planter and bollards at 3<sup>rd</sup> and C Streets



D: Garden wall along 3<sup>rd</sup> Street



E: Guard booth and bollards at 2<sup>nd</sup> and C Streets



F: Courtyard wall and bollards at 3<sup>rd</sup> and D Streets



G: Bollards at 2<sup>nd</sup> and D Streets

H: Bollards along 2<sup>nd</sup> Street

PROJECT ANALYSIS

Executive Summary

Staff has analyzed the proposed site improvements and perimeter security at FOB 8 and recommends that the Commission approve the project. Overall, the landscaped plaza, additional plantings around the building, and extensive vegetation within the surrounding public space will be a significant improvement to what currently exists on the project site. The landscaped plaza will provide a welcoming entry forecourt to the newly modernized office building, and provide a place where people can sit and relax perhaps during a lunch break, or as they make their way between buildings or nearby attractions such as the sites of the future Eisenhower and American Veterans Disabled for Life Memorials. In addition, the replacement of the existing surface parking lot with the plaza will result in numerous environmental benefits that are described in the

“Executive Order #13515” section of this report.



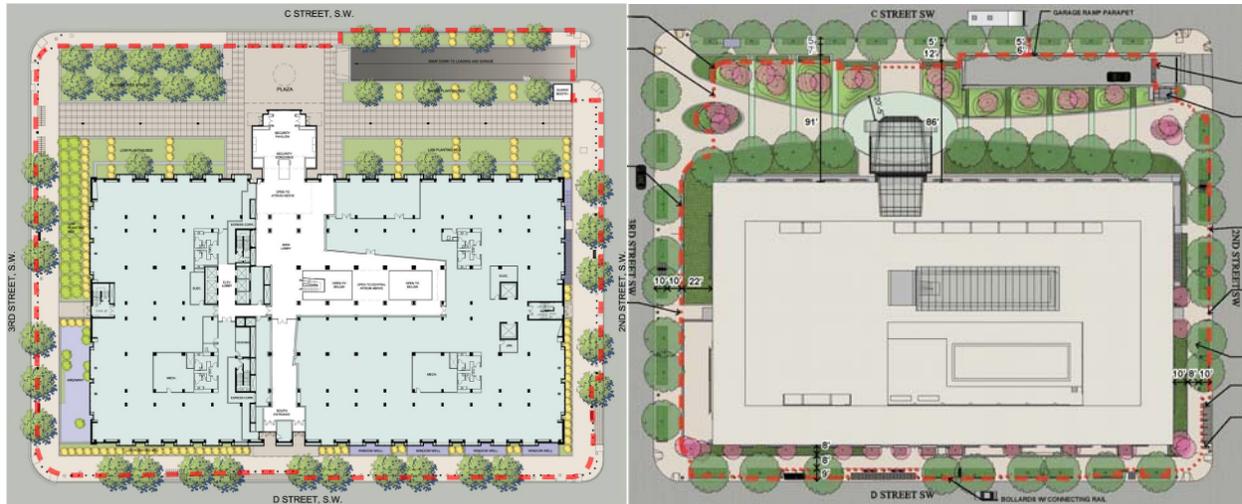
Existing surface parking lot on north side of FOB 8



Proposed plaza on north side of FOB 8

Staff’s review of the proposed perimeter security finds that it strikes an appropriate balance between providing building protection and maintaining the openness and accessibility of the surrounding public space to the greatest extent possible. The proposed perimeter security is consistent with the Commission’s policies and is a substantial improvement to the 2007 concept design, which located all security elements out along the curb. The security elements along 3rd and C Streets are located within the building yard, or inside the sidewalk, and have been designed to relate to the architecture of the building. In contrast, the security elements that are located at the curblines along 2<sup>nd</sup> and D Streets have been designed to relate to the

streetscape and surrounding urban context. In addition, extensive landscaping within the public space and building yard, and the use of a variety of hardened streetscape furnishings, will assist in reducing the impacts of the proposed security on visual and historic resources in the area.



2007 perimeter security proposal

Current perimeter security proposal

### Perimeter Security

Staff's review of the proposed perimeter security relied upon NCPC's policies governing perimeter security, the threat assessment information submitted by GSA, and the unique characteristics of the project site. On August 20, 2009, GSA submitted a Risk Assessment Report for FOB 8. This report describes the methodology and facility security standards that were employed for determining the protection level that was necessary given the intended future use of FOB 8. This analysis was conducted prior to the Legislative Branch being identified as the future tenant of the building. Based on several input measures, the results of this analysis indicated that a medium level of protection would be necessary. However, following the Architect of the Capitol's (AOC) commitment to lease space in the building, GSA and AOC reevaluated the level of protection that would be provided. This was due in part to the unique leasing arrangement involving a legislative branch agency, AOC, procuring office space from an executive branch agency, GSA, and the higher security standards held by the AOC. The modifications to the risk assessment resulted in a slightly higher level of protection. In this particular instance, these modifications did not result in additional standoff distance or increased impacts to public space. Rather, the higher level of protection was provided through additional strengthening of building materials and security elements.

The design of the perimeter security has evolved substantially from the concept that was reviewed by the Commission in 2007, which located the barrier line along the curb on all four sides of the building, and was composed almost entirely of bollards. The proposed security plan has a much reduced impact on public space due to modifications made in the location, material, and design of the individual elements. Along the C and 3<sup>rd</sup> Street sides of the building, where the building yard is greater than 20 feet, GSA located the perimeter security inside the sidewalk in accordance with Commission policy. Given the narrow sidewalk condition that exists along C Street, due to the existing garage ramp parapet that must remain, staff is pleased that the

proposed perimeter security will not exacerbate this problem. In fact, the chosen design for most of the security elements along C Street, specifically the hardened garden walls with foundation level plantings, should improve the pedestrian experience compared to what it is today. In contrast to a previous design that proposed a solid garden wall along the northwestern edge of the plaza, the current security plan creates breaks in the wall. This will help break down the scale of the wall, add additional permeability to the plaza, and psychologically decrease the narrowness of the sidewalk. It should also help reduce pedestrian congestion as people decide to walk through the plaza instead of along the narrow sidewalk.



Existing sidewalk condition on C Street at garage entrance



Proposed sidewalk condition on C Street at garage entrance

Security along 3<sup>rd</sup> Street will be provided primarily through hardening existing building features and will remain inside the sidewalk. This is particularly important since 3<sup>rd</sup> Street is a heavily-traveled pedestrian route to and from the nearby Metrorail entrance, and following the completion of the FOB 8 renovation pedestrian traffic will only increase. Along the northern portion of this side of the building, the replacement of the existing ground-level planting area with a hardened garden wall and rail will still retain a landscaped character. In addition, the construction of this garden wall will not result in a narrowing of the sidewalk, and the lush palette of vegetation that is proposed will add to pedestrian comfort. At the southern end of this side of the building, the replacement of the sunken courtyard guardrail with a low wall and connecting rail will retain the general configuration of the existing condition, and aesthetically be an improvement. The design and finish of this security element is the same as the garden wall located to the north, and should create a sense of consistency along the sidewalk.



Typical cross-section along 3<sup>rd</sup> Street showing sidewalk width of 10 feet

The location of perimeter security elements at the curb along 2<sup>nd</sup> and D Streets will have a degree of adverse impact on pedestrian circulation, the aesthetic and functional qualities of public space, and the historic L’Enfant Plan, which will be mitigated through the proposed design. Due to a complete lack of building yard along the entire length of these two streets, the security elements will be located approximately two feet from the edge of the curb with a few exceptions. At three locations along D Street, and one location along 2<sup>nd</sup> Street, existing Metrorail ventilation shafts at the edge of the curb will force the perimeter security to jog inward closer to the sidewalk, but not across the sidewalk.

At the intersection of 3<sup>rd</sup> and D Streets, where the proposed perimeter security transitions from inside the building yard to along the curb, pedestrians will need to maneuver around a single bollard located in the middle of the sidewalk on D Street. However, the bollard does not impede upon the nearby pedestrian crosswalks nor does it affect the primary pedestrian circulation route along 3<sup>rd</sup> Street. At the corner of 2<sup>nd</sup> and D Streets, the line of bollards that will extend across the corner will have a larger impact on pedestrian circulation. Pedestrians attempting to cross the street from this corner in any direction will need to navigate between the four feet of clearance provided by these bollards. Although the impacts on pedestrians will be greater than what could occur at 3<sup>rd</sup> Street, it is anticipated that 2<sup>nd</sup> and D Streets will be secondary pedestrian routes carrying lower volumes due to the presence of the I-395 access ramp. This will help minimize the impacts that could occur.



View of 3<sup>rd</sup> and D Streets



View of 2<sup>nd</sup> and D Streets



Curbside landscaping along D Street



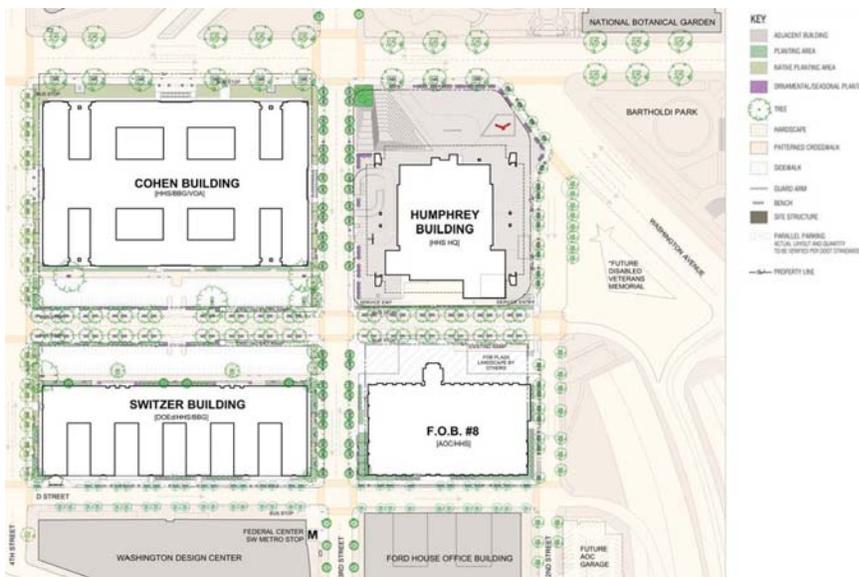
Curbside landscaping along 2<sup>nd</sup> Street

The curbside placement of perimeter security along 2<sup>nd</sup> and D Streets will have aesthetic impacts on the overall quality of the public space. In addition, the placement within the street right-of-way will have an adverse effect on the historic L’Enfant Plan. The use of a variety of hardened streetscape furnishings will reduce the visual presence of these elements in public space, and help integrate them more into the urban context. In addition, the extensive plantings at the base of the building, and especially within the tree boxes, will further reduce the aesthetic impacts of these elements.

## Consistency with the 3<sup>rd</sup> and C Street Urban Design Guide

Since 2006, GSA has spent considerable time developing a concept level design guide to help inform its four building modernization projects located at the intersection of 3<sup>rd</sup> and C Streets, SW, and to address several long-standing issues regarding the quality of the urban spaces surrounding these buildings. Examples of these issues include: the large expanses of surface parking lots that detract from the urban environment, increased surface runoff and ambient air

temperatures, impact on pedestrian connectivity; poor condition of pedestrian pathways; and a non-descript mixture of uncoordinated landscaped areas. In addition, the magnitude of the four projects was also seen as an opportunity to revitalize this corridor through a consistent streetscape design that provides public seating, public amenities, and settings for fine art under GSA's "Art in Architecture" program.



GSA's 3<sup>rd</sup> and C Street Urban Design Guide

Finally, GSA recognized that these four modernization projects presented the added opportunity to resolve the problem of unsightly security barriers by integrating barriers into a uniform streetscape design that maintains the openness, accessibility, and attractiveness of the public realm. Therefore, working closely with NCPC, the U.S. Commission of Fine Arts, and the District of Columbia government, GSA has prepared the "3<sup>rd</sup> and C Street Urban Design Guide." Some of the key features of this concept level guide include:

- The extensive use of raised planters to serve as both landscaped areas as well as security barriers.
- Substantial changes to the three surface parking lots plus changes to C Street and the associated driveways and sidewalks.
- Extensive use of tree boxes with steel bollards that serve as both security barriers as well as decorative protection to ground cover plant materials.
- Making gardens and plazas publicly accessible.
- Providing public seating areas.
- Incorporating paved pads for future street vendors.
- Coordination with the future Eisenhower Memorial and American Veterans Disabled for Life Memorial.
- Provision of bicycle racks and bus stop shelters.
- Coordination of materials for paving, planter walls, street trees, plants, ground covers and crosswalks.

The proposed site improvements and perimeter security at FOB 8 have been designed to be consistent with the “3<sup>rd</sup> and C Street Urban Design Guide.” Extensive landscaping proposed within the C Street plaza and surrounding public space successfully integrates the proposed security elements while at the same time improving the overall setting of the building. The conversion of the surface parking lot to a welcoming public plaza will add much needed open space to this area of the city and provide an area where people can sit and relax. Finally, the extensive landscaping and substantial increase in the number of street trees will greatly improve the pedestrian experience and connections between the two nearby future memorial sites.

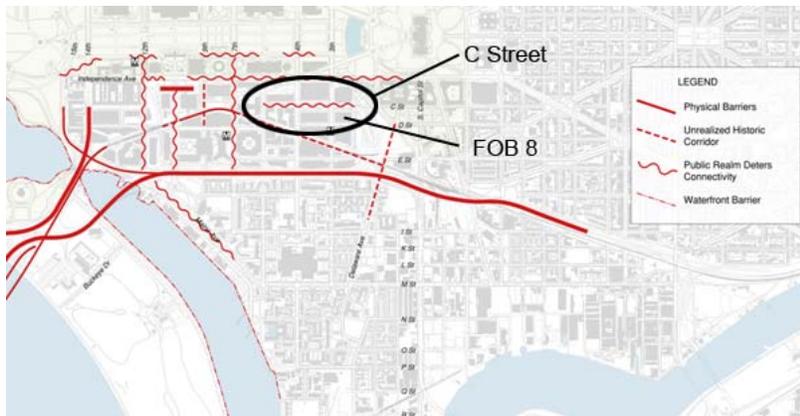
## CONFORMANCE

### Comprehensive Plan for the National Capital

The project successfully carries out several of policies contained in the Comprehensive Plan for the National Capital (Comprehensive Plan), especially those within the Federal Workplace, Transportation, and Federal Environment Elements. In general, these policies encourage the federal government to modernize, repair, and rehabilitate existing federal workplaces within the monumental core; locate workplaces near public transportation; coordinate closely with local agencies; and provide welcoming, publicly accessible, sustainable places to work and visit. The proposed site improvements for FOB 8, together with the modernization of the existing building, will satisfy each of these areas. The renovation and modernization of FOB 8 will provide additional high-quality federal office space within the monumental core, and within an area of the city that is in high demand for such space. In addition, the reuse of the existing building and proposed site improvements will offer a wide-range of sustainable benefits such as a LEED rated building, significant decrease in impervious surface, transit-oriented development, added tree canopy, bicycle parking, and new public amenities. Finally, the proposed perimeter security is consistent with the Federal Workplace policies pertaining to the design and location of physical building security. Security has been incorporated into the design of the building and perimeter security elements have been located within the building yard where possible. The security elements that will be located in public space have been designed to be consistent with local streetscape standards and located so as not to excessively restrict pedestrian mobility.

### Monumental Core Framework Plan

The project site is located within the Southwest Rectangle precinct of the Monumental Core Framework Plan (Framework Plan). One of the plan’s key goals within this area is to repair the urban fabric lost over time due to the construction of superblock buildings, highways, and railroad infrastructure by restoring the street grid, decking over highways, and redeveloping superblocks to integrate open space and improve the public realm. In addition, the Guiding Themes section of the Framework Plan promotes a collection of non-area specific strategies that can be applied to the project site, and its surrounding public space, in order to overcome barriers, improve connections, strengthen the public realm, and advance sustainability in the urban environment.



Monumental Core Framework Plan barrier diagram for the Southwest Rectangle precinct

Immediately surrounding the project site, the Framework Plan identifies several physical and psychological barriers. For example, C Street, between 2<sup>nd</sup> and 5<sup>th</sup> Streets, is identified as an area where the condition of the public realm deters pedestrian connectivity. Features such as large building setbacks, surface parking lots, lack of open space, and narrow sidewalks, all contribute to creating an unpleasant

environment for pedestrians. In addition, the nearby I-395 Freeway and associated access ramps contribute to the barriers that plague this area of the city. The proposed site improvements will contribute to repairing the urban fabric of this area by significantly improving the accessibility and attractiveness of the project site as well as the public realm. The replacement of the surface parking lot with a landscaped plaza will help to soften an area that is severely lacking in open space. In addition, the extensive landscaping within the building yard, and within public space along 2<sup>nd</sup>, 3<sup>rd</sup>, and D Streets, will help to improve pedestrian connectivity. This increased connectivity, especially along C Street, will be important to successfully linking the future Eisenhower Memorial with the future American Veterans Disabled for Life Memorial.

Additionally, the project will do much to advance sustainability in the urban environment. The large reduction in impervious surface on the project site will decrease runoff and ease pressure on the city's infrastructure. The substantial increase in street trees and other landscaping will contribute to reducing the urban heat island effect, help reestablish the tree canopy, and restore native habitats. Finally, the extensive landscaping proposed along the streetscape and within the plaza will assist in creating a connected system of parks and open space throughout this area of the city, and encourage more environmentally sustainable modes of transportation such as walking and biking.

#### National Capital Urban Design and Security Plan Objectives and Policies

Overall, the project is consistent with the National Capital Urban Design and Security Plan Objectives and Policies. Adopted by the Commission in May 2005, these objectives and policies address planning and design issues associated with risk management strategies that impact the public realm, primarily physical perimeter security for explosives delivered by bomb-laden vehicles. They are intended to balance the need for perimeter security with the need to protect the openness and accessibility of public space. Specifically, there are two objectives that directly apply to the proposed perimeter security at FOB 8. These objectives strive “to protect the design principles inherent in DC’s historic plan and its historic resources and minimize the physical and visual intrusion of security barriers into public space” and “to strike a balance between perimeter security for federal buildings and the vitality of the public realm.”

The proposed perimeter security is consistent with these objectives, and with all policies pertaining specifically to the location and design of security elements. First, NCPC's policy states that for existing buildings in urban areas, perimeter security barriers should be located within the building yard when the size of the yard is greater than or equal to 20 feet. The placement of barriers within public space is generally discouraged, and should only be considered if the width of the building yard is less than 20 feet. For FOB 8, GSA has been able to successfully locate perimeter security within the building yard, or inside the sidewalk, along the north and west sides of the building. Along the other two sides, where the width of the building yards for the entire length of the building measure zero and five feet wide, the proposed security elements have been placed along the curb. The location of security elements does not prevent public access to building lawns and designated entries, and furthermore, the elements along the curb and near crosswalks have been located to allow for safe pedestrian access and circulation.

Consistent with NCPC's policies; the perimeter security design employs several strategies to minimize the physical and visual impact of the security elements on the quality and accessibility of the site and its surroundings. First, where existing immovable elements exist on the site, they are used as a part of the perimeter security scheme, thus, the guard railing/walls at the garage ramp, and sunken courtyard along 3<sup>rd</sup> Street, become part of the security barrier. The second way in which the visual impact of the security elements is minimized is the separation of the elements into two different architectural styles based on their location. For example, elements located within the building yard are treated as a part of the building. They incorporate materials that match or complement the building's exterior finishes. Security elements located at the curb are treated as a part of the street furnishings and thus are detailed in a manner different from those in the building yard. For example, the form and color of these particular elements have been designed to be consistent with local streetscape guidelines and regulations, and to blend in more with the vegetation that is proposed within the public space.

#### Executive Order #13514

On October 5, 2009, Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance" ("the Order"), was enacted by President Barack Obama. The purpose of the Order is "to establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions a priority for Federal agencies." The Order sets out policies for federal agencies to, among other things, increase energy efficiency, reduce greenhouse gases, protect water resources, and operate high performance buildings in sustainable locations. In addition, the Order establishes a policy for federal agencies to strengthen the vitality and livability of the communities in which federal facilities are located.

Several components of the proposed site improvements at FOB 8 respond to the objectives of the Order, and the policies it sets out for all federal agencies. Together with the modernization and renovation of the existing building, the project offers considerable environmental benefits through high-performance building design, construction, and operation; reduction of impervious surfaces; use of recycled building materials; transit-oriented development; promotion of alternative modes of transportation; and the reduction of runoff through sustainable stormwater management techniques. Provided by GSA, the following is a list of some of the environmental benefits for the proposed site improvements, perimeter security, as well as the modernization and renovation of FOB 8.

- Adaptive reuse of the existing building conserves energy and reduces the need for greenfield development.
- The site is well-served by several Metrobus lines and is approximately 150 feet from the Federal Center Southwest Metrorail station.
- The elimination of the existing parking lot along C Street will result in a 43% reduction in impervious surfaces.
- The proposed plan increases the number of street trees by 130%.
- The additional street trees will improve pedestrian comfort and reduce urban heat island effect.
- The building includes a green roof on 50% of the roof area to reduce energy demand and filter stormwater.
- Accent pavers within the plaza are composed of recycled glass.
- Pavements are high albedo to reduce urban heat island effect.
- Perimeter security elements include steel bollards composed of 90% recycled content.
- The site will accommodate storage for 100 bicycles.
- Stormwater from the plaza will be collected in a cistern for use in irrigating the landscape.
- Condensate from the building HVAC system will be collected for use in irrigating the landscape.
- The landscape will incorporate native vegetation to the extent practical to minimize demand for irrigation and maintenance.
- The proposed design improves accessibility for those with disabilities.
- The proposed shaded seating areas and sculptural lawns create new places for social interaction.
- The underground parking garage will have designated spaces for fuel efficient vehicles and alternative fuel vehicles, such as electric charging stations.
- The onsite parking provided is approximately 80% lower than the Comprehensive Plan's 5:1 parking ratio, and the minimum parking requirement according to local zoning requirements.

#### National Environmental Protection Act (NEPA)

NCPC and GSA each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the project. In accordance with the Council on Environmental Quality's rules for implementing NEPA, and the Commission's Environmental and Historic Preservation Policies and Procedures, GSA prepared an Environmental Assessment (EA) for the project, to which NCPC was a cooperating agency. The EA analyzed three design alternatives as well as a no action alternative, and 17 environmental impact topic areas. These topic areas are generally categorized as: cultural, socioeconomic, and natural resources; transportation; utilities and infrastructure; air quality; and noise. Following the necessary procedures for analysis, public comment, and response to public comments received, GSA selected "Alternative B" and issued a Finding of No Significant Impact (FONSI) for this alternative on December 11, 2009.

Of the 17 environmental topic areas analyzed, staff's analysis of the EA focused primarily on the potential impacts to historic and visual resources, public space, and pedestrian circulation. Staff focused on these areas given the negative impacts that perimeter security can have on the integrity of historic features, especially the L'Enfant Plan, and on the quality and accessibility of the public realm. On February 25, 2010, NCPC issued a FONSI for "Alternative B" stipulating that the project will not have a significant impact on the human environment, and that impacts caused by the proposed perimeter security will be successfully mitigated through utilization of a variety of hardened streetscape furnishings, extensive landscaping, and consistency with local public space guidelines and regulations per the project design. The following discusses the direct, indirect, and cumulative impacts of the proposed site improvements and perimeter security of "Alternative B" on historic and visual resources, public space, and pedestrian circulation.

### Historic Resources

In addition to the CEQ regulations for implementing NEPA, the National Historic Preservation Act of 1966 (NHPA), as amended, establishes standards for evaluating effects to historic resources. The NHPA defines "effect" as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." According to the NHPA, an "adverse effect" occurs "when an undertaking may alter, directly or indirectly, any of the characteristics of the historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." The EA analyzed the project's potential environmental impacts on the following existing and potential historic resources: the L'Enfant Plan; the McMillan Plan; the Mall; the U.S. Capitol and grounds; the U.S. Botanic Garden; Bartholdi Fountain; and the Humphrey, Switzer, and Cohen Buildings.

According to the EA, the replacement of the surface parking with a landscaped plaza will alter the use and appearance of the space between FOB 8 and C Street, and have negligible indirect impacts on historic resources. With respect to the installation of perimeter security elements between the sidewalk and the curblin on 2<sup>nd</sup> and D Streets, the EA indicates that this will form both physical and visual barriers between the building façade and adjacent L'Enfant streets. These barriers would alter the continuity of the roadways and the historic spatial relationships that are important features of the L'Enfant Plan. The direct impacts on the L'Enfant Plan are considered to be minor to moderate, while indirect impacts on the Switzer, Cohen, and Humphrey buildings would be negligible to minor. To mitigate these impacts, the EA recommends that the security elements consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, in order to minimize the number of bollards required.

The EA states that "the installation of perimeter security elements, particularly along the curblin, has the potential to generate cumulative impacts to historic resources, when considered together with the other perimeter security projects that been recently completed or planned within D.C." The placement of the proposed security elements along the curblin at 2<sup>nd</sup> and D Streets could increase the likelihood that adjacent property owners will install perimeter security

due to a perceived increase in potential threat. This could generate minor adverse cumulative impacts to adjacent historic structures, and moderate adverse impacts on the L'Enfant Plan.

### Visual Resources

A visual assessment of potential changes to views and vistas was conducted for the proposed site improvements and perimeter security. Impacts to views and vistas were determined based on an analysis of the existing quality of the view, the sensitivity of the view (such as important views from historic and cultural sites), and the anticipated relationship of the proposed project to the existing visual environment.

Overall, the visual impacts caused by the project, almost solely by the proposed perimeter security, would be minor to moderately adverse, with beneficial impacts created by the new landscaped plaza and increased number of street trees. Along 2<sup>nd</sup> and D Streets, the EA states that the proposed security elements, located along the curb, would visually intrude into the space and divide the pedestrian space from the roadway. This will also differ from the open sidewalk design found on the opposite side of 2<sup>nd</sup> Street. Along C Street, where the security elements are located inside the sidewalk, the EA states that the proposed hardened seatwall, bus shelter, and bollards would dominate the view, but that the addition of street trees would provide a consistent green edge and help to frame views. In addition, the landscaped plaza would also help to open up the views along the corridor. Finally, the visual impacts along 3<sup>rd</sup> Street are considered to be minor given that the perimeter security elements are located inside the sidewalk and largely consist of existing building elements that have been hardened. Similar to historic resources, the EA recommends that the security elements consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks as a way to mitigate the impacts to visual resources.

In analyzing cumulative impacts of perimeter security at FOB 8, when considered with other constructed or planned perimeter security projects, the EA indicates that impacts to visual resources could be moderately adverse if perimeter security is placed at the curblines, with minor adverse impacts if placed within the building yard. The reason for the added impact when placed at the curb is that these elements have the potential to interrupt the open relationship between the sidewalks and the roadways. The EA does, however, claim a potential for beneficial cumulative impacts if the proposed improvements to FOB 8 are undertaken in accordance with GSA's "3<sup>rd</sup> and C Street Urban Design Guide." These benefits would result from the installation of additional street trees and common streetscape elements.

### Public Space

The proposed perimeter security plan in "Alternative B" would not comply with DDOT's objective of keeping perimeter security measures out of public space. DDOT also strives to keep pedestrian circulation routes unencumbered by security elements. The proposed perimeter security is partially inconsistent with these objectives, specifically along 2<sup>nd</sup> and D Streets, and where security elements cross the sidewalk. The EA has determined that the project's impacts to public space will be minor to moderately adverse. As possible mitigation, the EA recommends that DDOT be involved throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space. DDOT has been involved

throughout the design process for the proposed site improvements and perimeter security, and the proposed design is substantially compliant with DDOT policies and procedures.

According to the EA, “the proposed exterior improvements to FOB 8 have the potential to create cumulative impacts to public space.” When considered together with the future Eisenhower and American Veterans Disabled for Life Memorials, the new landscaped plaza along C Street would create beneficial cumulative impacts by improving three underutilized sites. However, the proposed perimeter security at FOB 8, when considered together with other security projects completed or planned with Washington, DC, could adversely impact public space, especially if located outside of building property lines. The EA states that “the potential widespread installation of security elements within DC, if located outside of building property lines, would interrupt the continuity of the area sidewalks, creating a moderate adverse impact to public space.”

### Pedestrian Circulation

Moderate, short-term, adverse impacts to pedestrian circulation will occur during construction of the project which will be mitigated by appropriate signage and flagging. Following construction, the EA states that the combination of bollards, hardened street furniture, tree panels, fences, and hardened seatwalls would create minor to moderate adverse impacts on pedestrian circulation. The location of perimeter security at the curb along 2<sup>nd</sup> and D Streets will require pedestrians to cross through a line of bollards at the intersection of these two streets. Pedestrians will also be required to pass between bollards when entering the landscaped plaza on the north side of the site. In addition, bollards will cross the sidewalk at the two locations where the proposed perimeter security transitions from the curb to the building yard. These features will disrupt pedestrian flow on 2<sup>nd</sup> and D Streets, but will not alter pedestrian flow along 3<sup>rd</sup> Street as people make their way to and from the Metrorail. To help mitigate the moderate impacts to pedestrian circulation, the EA recommends that the final design facilitate circulation to and from the two future memorials site, and comply with ADA accessibility requirements, which the design does.

The placement of security elements at the plaza entrances of FOB 8, coupled with the potential increase in visitation to the area due to the future memorials, could result in cumulative moderate adverse impacts. Further, the placement of bollards within the sidewalks at FOB 8 could contribute to cumulative moderate adverse impacts to pedestrian circulation in the area if adjacent buildings also install perimeter security outside of the building yards. These elements would impede pedestrian flow, particularly during peak periods. However, none of these impacts are considered significant given the adequacy of sidewalk widths along the most heavily traveled pedestrian routes, and the openness and accessibility of the plaza.

### National Historic Preservation Act (NHPA)

GSA has concluded Section 106 consultation with the District of Columbia State Historic Preservation Office (DC SHPO) through a Memorandum of Agreement. Although the office building is not listed in the National Register of Historic Places, the public space of the historic L’Enfant Plan is adversely affected by the proposed installation of security barriers.

GSA and the DC SHPO concurred that the adverse effects of the perimeter security barrier were minimized along the north and west sides of the building by locating the barrier inside the sidewalk and using a variety of barrier forms. The adverse effect was mitigated on the south and east side of the building, where the barrier is at the curb, through an extensive planting plan.

## CONSULTATION

### Coordinating Committee

The Coordinating Committee reviewed the proposal at its January 13, 2010 meeting and forwarded it to the Commission with the statement that the proposal has been coordinated with all participating agencies except the District of Columbia Fire and Emergency Medical Services (FEMS). The representative for the Fire Department noted concerns about fire hydrants on D Street, SW and the standpipe for the automatic sprinkler along C Street, SW. The participating agencies were NCPC; the National Park Service; GSA; The District of Columbia Office of Planning (DCOP); the Department of Housing and Community Development; and the Washington Metropolitan Area Transit Authority.

On January 21, 2010, staff informed GSA of the concerns expressed by FEMS, and requested information pertaining to whether the proposed site improvements and perimeter security complied with District requirements for clearance around fire hydrants and standpipe connections. By email dated February 9, 2010, GSA stated that “there is typically 4 feet, and never less than 3 feet, clearance around all existing fire hydrants on the FOB 8 site.” Furthermore, GSA indicated that all standpipe connections will be accessible, and clearly visible from the street. On February 16, 2010, FEMS indicated to staff, by electronic mail, that GSA had adequately addressed all of its concerns and that the project could be forwarded to the Commission.

### U.S. Commission of Fine Arts

On January 21, 2010, the U.S. Commission of Fine Arts (CFA) reviewed and approved the final plans for the modernization and renovation of FOB 8, including perimeter security. During its presentation, GSA presented CFA with several options for the design and material make-up of the curbside security elements. Ultimately, CFA approved a dark color for the curbside metal bollards set on a flush curb around the tree boxes and without a horizontal top rail. Finally, CFA questioned the selection of the bright-green recycled-glass paving material for the decorative banding in the plaza, and recommended that a uniform cooler gray-green material be used for all of the plaza accents. These changes have been made to the design and are reflected in the current proposal.

### Coordination with District of Columbia Government Agencies

On January 22, 2010, staff met with members of GSA’s design team, and with representatives from DCOP and the District Department of Transportation (DDOT), to discuss the project’s consistency with local public space guidelines and regulations. This meeting was held to directly

respond to comments submitted by DCOP on the final Environmental Assessment prepared for the FOB 8 project. DCOP submitted comments on the following four items:

- Consistency with existing public space guidelines and regulations.
- Sustainable building practices within public space.
- Coordination of the proposed streetscape plan with the adjacent corners at 3<sup>rd</sup> and C Streets, SW
- Stormwater benefits resulting from reductions in impervious surface.
- Relationship of security elements to surrounding urban context.
- Seating within the C Street plaza.

At the January 22, 2010 meeting, as well as by letter dated February 7, 2010, GSA satisfactorily responded to each of the comments listed above. The information provided by GSA in response to DCOP's comments has been incorporated into the plans for the proposed site improvements and perimeter security at FOB 8, and has also been incorporated into staff's report to the Commission.