

STAFF RECOMMENDATION



Hinkle
NCPC File No. 7145

NATIONAL MALL AND MEMORIAL PARKS HEADQUARTERS, EAST POTOMAC PARK INSTALLATION OF A TEMPORARY MODULAR OFFICE TRAILER

900 Ohio Drive, SW
Washington, D.C.

Submitted by the National Park Service, Department of the Interior

August 26, 2010

Abstract

The National Park Service proposes to install a temporary modular office trailer at the National Mall and Memorial Parks (NAMA) Headquarters, located in East Potomac Park. The existing structures at the Park Headquarters are currently at maximum capacity; the temporary modular office trailer will provide space for additional planning and resources staff. This additional staff will help manage new construction projects on the National Mall. The temporary modular office trailer will be similar in design to an existing modular office facility at the site, and landscaping will screen the proposed structure from view from Ohio Drive, SW. No additional parking will be built at the site.

Commission Action Requested by Applicant

Approval of comments on concept design pursuant to 40 U.S.C. § 8722(b)(1) and (d).

Executive Director's Recommendation

The Commission:

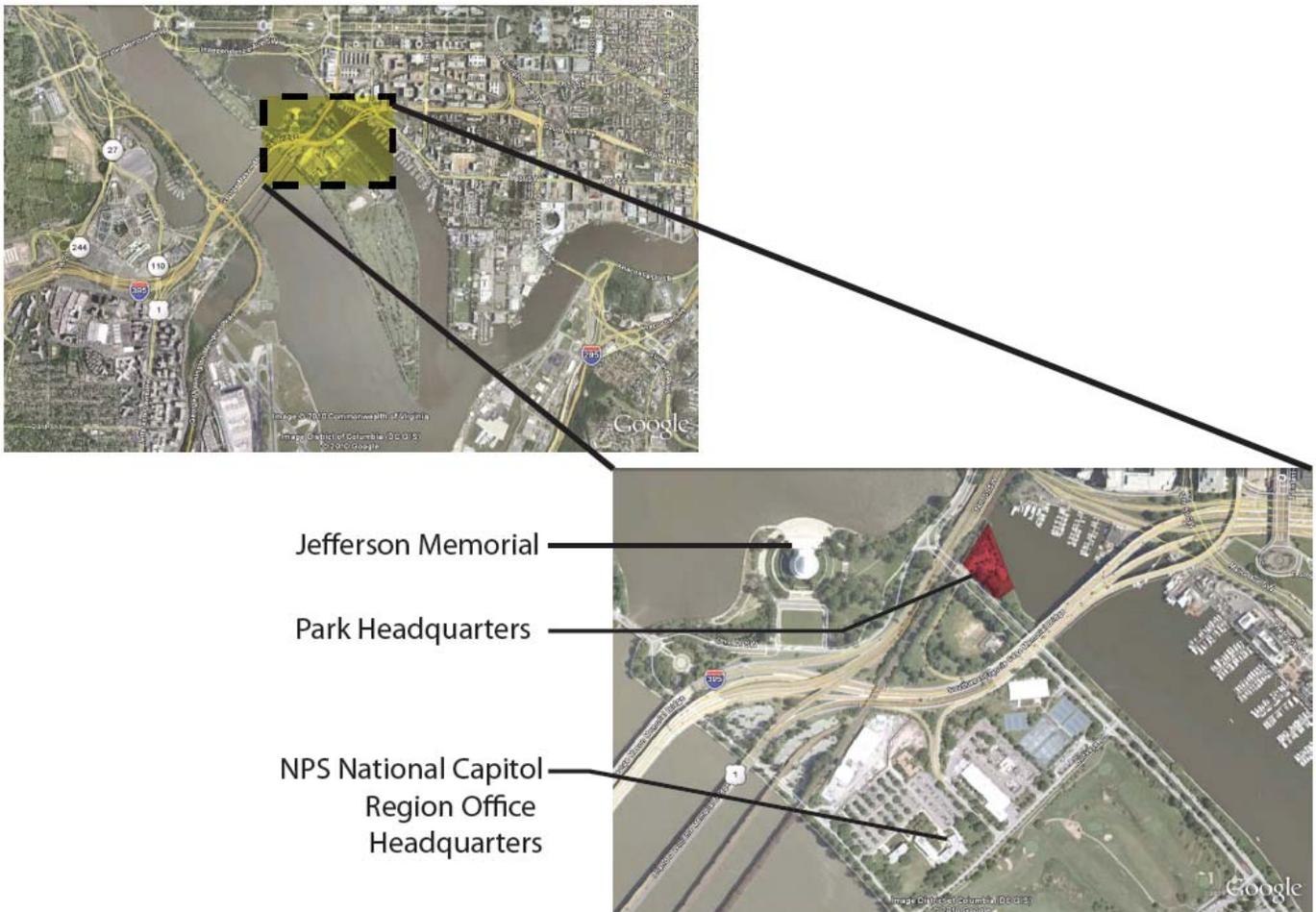
Comments favorably on the concept design for the installation of a modular office trailer at 900 Ohio Drive, SW in Washington, D.C., as shown on NCPC Map File No. 1.51(38.00)43121, noting that the placement of the trailer will be temporary.

* * *

PROJECT DESCRIPTION

Site

The National Mall and Memorial Parks (NAMA) Headquarters is located in the northeastern portion of East Potomac Park at 900 Ohio Drive, SW, Washington, D.C. The park headquarters is adjacent to the Washington Channel of East Potomac Park between 14th Street and the Southwest Freeway. Currently the Park Headquarters consists of a parking area and two structures: a modular office facility composed of trailers similar to that proposed, and the "Annex" building (the historic Army Corps of Engineer's Storehouse).



Project Description

The National Park Service proposes to install a temporary modular office trailer at the National Mall and Memorial Parks Headquarters. NAMA will be adding 15 additional planning and resources staff to help manage new projects on the National Mall that will soon begin construction (including the National Mall turf and soil reconstruction project approved by the Commission on June 3, 2010 and the phase 1 Potomac Park levee project approved by the Commission on May 7, 2010). This new staff will also help begin the planning, design, and compliance processes for the future implementation of projects that will grow out of the *National*

Mall Plan (draft plan reviewed by the Commission on March 4, 2010). The existing structures at the Park Headquarters are currently at maximum capacity and do not have space for the additional staff.

The proposed 128 ft x 32 ft modular office trailer will be located between the Annex and Ohio Drive, SW. No additional parking is being proposed. The new facility will include two ADA compliant restrooms, a large conference room, a break room, offices, support areas, and a reception area. The facility will have a fire alarm system, security system, electrical, plumbing, and communication lines; an ADA compliant ramp, and a roofed entrance deck. The project will connect new plumbing, electrical and communication lines to the existing systems at the site. Minimal footings, that can be easily removed, will be used to support the temporary structure.

This project will remove one cottonwood tree that is in a state of decline. The project will plant a new pecan tree between the Annex and the proposed temporary modular office trailer and fifteen dragon lady hollies near the fence line to provide screening of the temporary building from Ohio Drive, SW. Fifteen cherry laurels will be planted on the north end of the temporary trailer.

An existing flagpole on the site will be relocated so that it is approximately centered between the Annex and the proposed temporary modular office trailer.



Proposed site plan



Illustration of proposal viewed from Ohio Drive, SW (existing and proposed conditions)

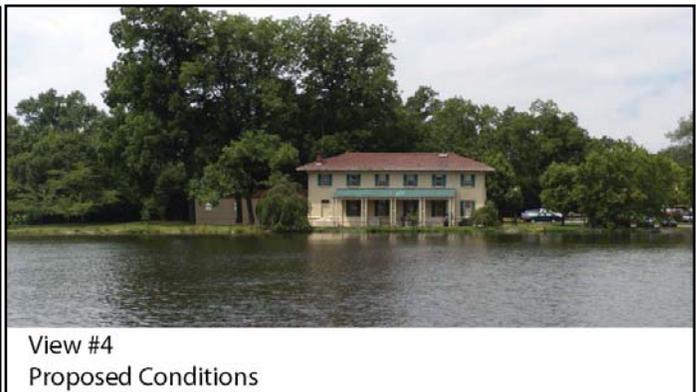
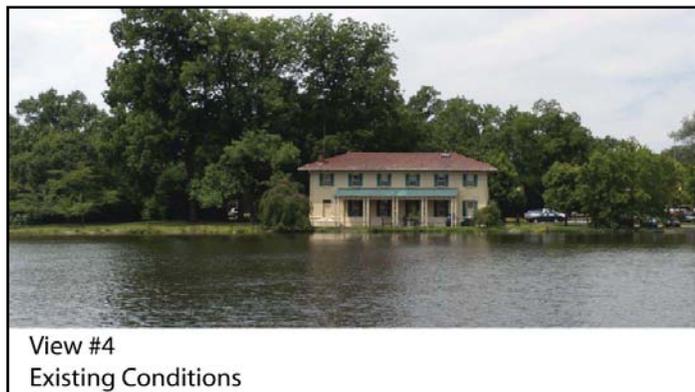


Illustration of proposal viewed from the marina across the Washington Channel

Project Analysis

Staff finds the concept design for the temporary modular office trailer at the National Mall and Memorial Parks (NAMA) Headquarters is consistent with the existing uses and structures within the Park Headquarters site. The proposal is consistent with the Park Headquarters use for the site designated within the *Development Concept Plan for East Potomac Park* (approved by the Commission on December 2, 1982). The proposal is not inconsistent with the *Comprehensive Plan for the National Capital: Federal Elements*. The Park Headquarters is also outside the area covered within the draft *National Mall Plan*; the proposal does not conflict with the draft recommendations in that plan.

The site for the temporary modular office trailer is heavily shaded and primarily behind the historic Army Corps of Engineer's Storehouse building, making it minimally visible when viewed across the Washington Channel from the shore of the north edge of the Channel. The plan for future private development on the Southwest Waterfront will occur east of the Southwest Freeway bridge; the siting of the proposed temporary modular office trailer west of this bridge will result in no visual impacts to future development on the Southwest Waterfront.

The Park Headquarters and site for the temporary modular office trailer are located in an area designated for potential infill development opportunities and a vehicular tunnel, as recommended within the *Monumental Core Framework Plan* (adopted by the Commission at its April 2, 2009 meeting).

The NPS recognizes the need to begin planning for a permanent solution to address their office space/facilities needs and to coordinate these needs with the goals and recommendations of the *Monumental Core Framework Plan*. As such, the NPS has begun an existing conditions study with Beyer Blinder Belle to examine their existing and projected support facility space needs and to evaluate the existing conditions of their current facilities, including the NAMA Park Headquarters; the NPS National Capital Region headquarters, the U.S. Park Police headquarters, and the Park Police substation located near the clubhouse of the East Potomac Park Golf Course. This study will also analyze which, if any, of these facilities should be relocated or consolidated. This study is the first step in

formulating a thorough project statement, or scope of work, and funding estimate to develop a comprehensive master plan for these facilities. When such a master plan is funded, the NPS will comply with all National Environmental Policy Act and Section 106 public consultation processes and will work to develop solutions that are in concert with the goals and recommendations of the *Monumental Core Framework Plan*.

As the concept design for the temporary modular office trailer at the Park Headquarters is: consistent with the existing uses and structures within the Park Headquarters site; the Park Headquarters use for the site designated within the *Development Concept Plan for East Potomac Park*; is not inconsistent with the *Comprehensive Plan for the National Capital: Federal Elements*; and the NPS has begun a study to develop a new Park Headquarters in a location that does not conflict with the goals and recommendations of the *Monumental Core Framework Plan*, **staff recommends that the Commission comment favorably on the concept design for the installation of a modular office trailer at the Park Headquarters. Staff also recommends that the Commission note that the placement of the trailer will be temporary.** Staff anticipates recommending, at preliminary and final review, that approval of the installation of the trailer by the Commission not exceed four years. The four-year period will allow time for the NPS to complete the planning and work towards the design and construction of permanent facilities for NAMA Park Headquarters. Following final approval of this proposal by the Commission, the NPS should resubmit the approval of the installation of the temporary modular office trailer to the Commission for review and possible further Section 106 consultation in four years, if at that time the trailer has not been removed.



Existing view of the site from the marina across the Washington Channel

CONFORMANCE

Development Concept Plan for East Potomac Park

The Commission approved the *Development Concept Plan for East Potomac Park* at its December 2, 1982 meeting. The proposed temporary modular office trailer is consistent with the Park Headquarters use for the site designated within the plan.

Comprehensive Plan for the National Capital

The proposed temporary modular office trailer at the National Mall and Memorial Parks Headquarters is not inconsistent with the *Comprehensive Plan for the National Capital: Federal Elements*.

National Environmental Policy Act (NEPA)

Pursuant to the National Environmental Policy Act, the National Park Service has determined that the proposed temporary modular office trailer qualifies as a Categorical Exclusion under Director's Order 12, Section 3-4, C.18: Construction of minor structures, including small improved parking lots, in previously disturbed or developed areas. Due to its approval authority over the project, NCPC has an independent responsibility to satisfy the requirements of NEPA in accordance with its own environmental policies and procedures, and the Council on Environmental Quality's rules. Staff is currently evaluating the proposal to determine what type of documentation will be required in advance of the Commission's review of the preliminary and final design stages of the proposal, in compliance with NEPA and the Commission's Environmental and Historic Preservation Policies and Procedures.

National Historic Preservation Act (NHPA)

Pursuant to the National Historic Preservation Act, the National Park Service has determined that the temporary installation of a modular office trailer will have no adverse effect on the historic properties and resources of East Potomac Park. East Potomac Park is listed on the National Register of Historic Places, and the nearby Army Corps of Engineer's Storehouse building is a contributing historic structure. The other National Mall and Memorial Parks Headquarters building at 900 Ohio Drive, SW is not a contributing structure.

The proposed temporary modular office trailer will house staff offices and will be removed once funding can be secured and a permanent structure constructed at this or another location for the Park Headquarters. The temporary modular office trailer is sited appropriately, in staff's view, because it is largely obscured from views from the Washington Channel. From Ohio Drive, SW the trailer will be visible, although the NPS will plant trees to screen the façade. The NPS has consulted with the District of Columbia State Historic Preservation Office (DC SHPO), which met with the NPS on site to determine the best location for the trailer in relation to viewsheds and the landscape setting, and which concurred with the NPS's determination of no adverse effect, provided that the trailer is removed once a permanent headquarters is constructed.

The project has been submitted for the Commission's review and comments on the concept design. In compliance with the NHPA and the Commission's Environmental and Historic Preservation Policies and Procedures, staff is currently evaluating the proposal under its independent Section 106 responsibility in advance of the Commission's review of the preliminary and final design stages of the proposal.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its August 11, 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 Department of Housing and Community Development, the District of Columbia Office of Planning, the District of Columbia Department of Transportation, and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

At its meeting of July 15, 2010, the Commission of Fine Arts reviewed the proposed temporary modular office trailer for the National Mall and Memorial Parks Headquarters. Although dismayed by the appearance of the proposed prefabricated trailer, the Commission recognized the difficulties the National Park Service faces in accommodating increased staff with limited funds and approved the project as a temporary installation for a period not to exceed four years, suggesting that the NPS use this time to develop a permanent facility for this park unit. The Commission members offered several suggestions to mitigate the appearance of the temporary modular office trailer. They recommended using dark window frames instead of white since the darker color would be less obtrusive. Similarly, they suggested that alternative exterior wall colors be considered to make the structure less prominent within the park landscape.

The Commission encouraged the NPS to seek a long-term solution to the problem posed by the frequent need for temporary office space in national parks. They urged the NPS to work with manufacturers of modular structures to develop an aesthetically appropriate design that could be used throughout the National Park System.

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National Coalition to
Save Our Mall 
Preserving Our Monument to Democracy
an organized voice for the public on Mall matters

August 17, 2010

Chairman L. Preston Bryant, Jr.
National Capital Planning Commission
401 9th Street NW, North Lobby, Suite 500
Washington, DC 20004

Dear Chairman Bryant:

We see that the National Capital Planning Commission has included the National Park Service's proposed new temporary modular office unit project on the draft agenda for the September 2nd. It is currently listed as a "Delegated Item," which means there will be no public presentation and no public testimony will be taken.

The National Coalition to Save Our Mall is submitting comments to the National Park Service regarding this project by the August 30 comment deadline. We are strongly urging NPS not to seek a Categorical Exclusion and instead begin the NEPA and Section 106 public consultation process. In addition, we are requesting that NPS extend the public comment period to September 30.

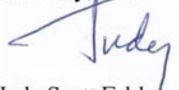
We are asking NCPC also to reject the NEPA exclusion and, if this project remains on the NCPC September 2nd draft agenda, to change it from a "Delegated Item" to an "Action Item" so District residents and the general public can see and comment.

I wish to sign up to testify on this project on behalf of the National Coalition to Save Our Mall at the September 2nd meeting.

Let's be clear, this substantial structure once constructed next to the existing "temporary" Headquarters Building will be here a long, long time. The NPS record over the past 50 years is plain: temporary buildings become permanent. The history is further discussed in our more detailed comments to NPS. If this project is built as planned, the loss will be to the District of Columbia, where plans for the Southwest Waterfront redevelopment are moving quickly forward, and to federal interests as well. We wonder why NCPC appears ready to green-light this project which will likely destroy any real possibility of achieving the goals for this area laid out in NCPC's new Monumental Core Framework Plan.

Please feel free to contact me if you have any questions, at 301-340-3938.

Sincerely,



Judy Scott Feldman, PhD
Chair

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