National Capital Planning Commission

GSA HEADQUARTERS
BUILDING MODERNIZATION (GROUND FLOOR RETAIL)

1800 F Street NW
Washington, DC

Finding of No Significant Impact

MAR 30 2011

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and the Environmental and Historic Preservation Policies and Procedures of the National Capital Planning Commission (NCPC), I have evaluated the preliminary and final site and building plans for the modernization of the General Services Administration's Headquarters, located at 1800 F Street, NW in Washington D.C., as shown on NCPC Map File No. 23.00(38.00)43280, the May 2010 Environmental Assessment (EA) prepared by the General Services Administration (GSA), and the public comments received by GSA, and have determined that the proposal will not have a significant impact on the human environment. The scope of this Finding of No Significant Impact (FONSI) is limited to Alternative B as analyzed in the EA, which includes no new perimeter security elements, retail additions on the south (E Street, NW) side of the GSA Headquarters, and modifications to the south lobby entrance.

Proposed Action

GSA prepared an EA, to which NCPC was a cooperating agency, to analyze the potential environmental impacts that could result from the modernization of the GSA Headquarters (the Building) located at 1800 F Street, NW.[1] In addition to a No Action Alternative, the EA analyzes two development alternatives described as "Alternative A" and "Alternative B." Alternative A involves the modernization of the Building including: (1) demolition, removal, and disposal of existing interior systems; (2) façade improvements; (3) renewal of the Building's physical plant including green building and energy conservation features; (4) changes to the building access and egress to include an ADA accessible entrance along the E Street side of the Building; and (5) perimeter security improvements. Alternative A also includes the construction of an additional 120,000 gross square feet (gsf) of building space within the Building's courtyards. Alternative B, GSA's preferred alternative, includes all of the elements described under items 1 – 3 in the list above as well as the 120,000 gsf courtyard addition. No perimeter security elements are proposed in Alternative B with the exception of the existing retractable bollards located at the two courtyard entrances along E Street, NW. Alternative B also includes the placement of ground-floor retail additions along the E Street, NW side of the

[1] The Environmental Assessment is incorporated by reference into this Finding of No Significant Impact

Building. To permit the construction of the retail additions, the Building's south lobby entrance and first floor will be lowered four to six feet to be at-grade. Therefore, an ADA accessible entrance along E Street, NW, as proposed in Alternative A, would not be necessary under Alternative B.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC's Environmental and Historic Preservation Policies and Procedures, an Environmental Assessment is sufficient and an Environmental Impact Statement need not be prepared if the EA supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

Potential impacts

The Environmental Assessment analyzed 13 environmental impact topic areas including: land use; planning controls and policies; public space; economics; historic resources; visual resources; vehicular circulation, transit, pedestrian, and bicycle circulation; air quality; noise; vegetation; stormwater; and hazardous materials.

On May 24, 2010, following the necessary procedures for analysis, public comment, and response to public comments received, GSA issued a FONSI for both Alternative A and Alternative B (the preferred alternative). GSA's FONSI notes that "while both Alternative A and B meet the overall purpose and need of the proposed action, Alternative B would provide public access to the Building without perimeter security elements. The introduction of retail along E Street NW would create an activated streetscape that is welcoming, inviting, and open. Retail would also attract additional visitors to the area, generate revenue from sales tax and tenant leases, and create employment opportunities." It also notes that the retail addition would comply with a number of federal policies and guidelines "including, but not limited to, the Public Building Cooperative Use Act of 1976, the Comprehensive Plan for the National Capital, the Monumental Core Framework Plan (sic), and GSA's Achieving Great Federal Spaces: A Property Manager's Guide."

On June 28, 2010, after having identified no significant impacts on the human environment, the Executive Director of NCPC issued a FONSI that was limited to the proposed interior and exterior modernization of the GSA Headquarters building, and the proposed 120,000 gross square foot courtyard addition (components of Alternative A). GSA has subsequently submitted to NCPC preliminary and final plans for Alternative B for review and approval. Therefore, NCPC's current review of the EA is focused in particular on the potential impacts to public space, pedestrian circulation, and historic and visual resources caused by the particular building improvements analyzed under Alternative B (no perimeter security, new E Street, NW entrance, and ground-floor retail additions).

According to the EA there will be no significant environmental impacts as a result of the proposed improvements under Alternative B. The EA does, however, identify several areas where there will be short- and long-term minor to moderate adverse impacts caused by these improvements and possible ways to mitigate these impacts.

The EA notes that the proposed construction could result in minor or moderate long-term adverse impacts to the public realm. These impacts will be mitigated through GSA's continued coordination with the District of Columbia's Department of Transportation (DDOT) on all proposed elements within the public space and following all of the guidelines presented in DDOT's *Design and Engineering Manual.*

Minor short-term adverse impacts to vehicular circulation will result from construction-related activities and mitigated through compliance with applicable local regulations, construction phasing, and management of delivery and construction hours during non-peak hours. Following construction, the EA indicates, minor adverse impacts will occur to vehicular circulation as a result of the increase in the number of employees at the Building and the reduction of available parking on-site. These impacts will be mitigated through GSA's continued participation in the SmartBenefits program, and through programs such as telecommuting and alternative work schedules. Because the Building would incorporate only small scale, ground-floor retail uses oriented to employees in the building and pedestrians and tourists in the area, the overall impact on parking from the retail addition would be minor.

Long-term minor to moderate impacts to transit, pedestrian, and bicycle circulation will occur as a result of the increased number of employees following completion of the modernization and courtyard addition. However, the EA states that since perimeter security measures would not be incorporated into the proposed building modernization, overall impacts to transit and pedestrian/bicycle circulation would be reduced under this alternative when compared to Alternative A. The EA also notes that pedestrian circulation could be affected by increased activity on the south (E Street, NW) side of the building, particularly if sidewalk café tables are added outside of eateries or restaurants included with the proposed retail, but this adverse impact on pedestrian circulation would be offset by the new public amenities (retail, restaurants, etc.) created at the site which did not previously exist. Other impacts identified by the EA include: long-term, moderate, adverse impacts to pedestrian circulation resulting from large trucks and service vehicles encroaching into the sidewalk and public space during deliveries and screening at the south courtyard entrances, and short-term, minor impacts on pedestrian and bicycle circulation during construction. To help mitigate these impacts the EA recommends the use of best practices and adherence to applicable local regulations pertaining to the management of construction activities. Finally, the EA indicates that short-term, minor, adverse impacts will occur to air quality and noise as a result of construction-related activities. Similar to above, the EA recommends adherence to local standards and implementation of appropriate best management practices during construction to help minimize construction vehicle and equipment emissions and noise.

Potential impacts and adverse effects on historic and visual resources were considered in the EA and through the Section 106 process of the National Historic Preservation Act (NHPA). GSA and the District of Columbia State Historic Preservation Office (DC SHPO) have determined that the proposed interior and exterior modernization of the historic GSA Headquarters building and courtyard infill addition will have an adverse on the Building and the L'Enfant Plan. On December 19, 2007, GSA, DC SHPO, and the Advisory Council on Historic Preservation (ACHP) entered into a Memorandum of Agreement (MOA) in order to avoid, minimize, and/or mitigate adverse effects on these historic features. At the time the MOA was executed, the proposed perimeter security and new E Street, NW entrance included in Alternative A, and the proposed ground floor retail additions included in Alternative B, were either still in design development or not yet part of the Undertaking. Since the proposed new E Street, NW entrance and ground floor retail additions were not yet part of the Undertaking, they are not part of the December 2007 MOA.

On March 15, 2011 the MOA was amended to include within the Undertaking the redesigned building entrance and ground floor retail along the E Street, NW side of the building. The MOA stipulates that the E Street, NW retail additions and entrance alterations be completed in accordance with the final illustrated designs as reviewed by the parties of the MOA and that mitigation for the retail additions include the placement in public areas of interpretive information on the architecture and history of the building. The MOA also notes that the scope of the Undertaking has changed based on GSA's Interagency Security Committee (ISC) level reassessment for the building and that previously proposed exterior perimeter security elements are eliminated. The MOA stipulates that site security be limited to the retention of the existing retractable bollards on site, that existing guard booths be removed, and that new booths be integrated with the E Street, NW retail design.

The EA also indicates that the improvements within Alternative B will have several beneficial impacts. With respect to land use, the EA states that the proposed retail scheme would be compatible with existing land uses surrounding the property and could also complement future retail and service uses within the area. The retail function would also activate the street environment and draw more visitors into the Building's public spaces. With respect to economics, the EA notes that the potential revenues from retail leasing and sales taxes generated from resident, employee, and visitor spending associated with Alternative B would have a beneficial impact on the local economy.

Cumulative Impacts

With respect to the proposed building improvements included within the scope of this FONSI, the EA has identified only a few cumulative impacts. According to the EA, under Alternative B the likely increase in pedestrian activity around the site could contribute to improving the surrounding areas in overall economic and cultural vitality. Alternative B would also have moderate adverse impacts on public space, as the retail additions occupy and project into publicly owned land. When combined with other built, planned, and proposed projects in the area, especially those projects with perimeter security elements,

the cumulative impact of these additions would be moderately adverse, resulting in additional development beyond the property line and a net loss in public space. The EA also identifies cumulative, short-term, beneficial impacts to the city as a whole associated with the construction-oriented jobs generated by the proposed action and other projects within the city. Activities associated with the construction of Alternative B are likely to add traffic to the surrounding street network, thereby causing minor adverse cumulative impacts to vehicular travel paths and the supply of on-street parking. However, the EA indicates that cumulative impacts to the regional transportation network would be negligible. Finally, the EA has identified that short-term, adverse impacts to air quality and noise will occur as a result of construction-related activities associated with the proposed action and other building projects nearby.

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