

STAFF RECOMMENDATION



Hinkle
NCPC File No. 6558

GSA HEADQUARTERS BUILDING MODERNIZATION (GROUND FLOOR RETAIL)

1800 F Street NW
Washington, DC

Submitted by the General Services Administration

March 31, 2011

Abstract

The General Services Administration (GSA) has submitted preliminary and final site and building plans to add ground floor retail storefronts as a component of the modernization of its headquarters building located at 1800 F Street, NW, in Washington, D.C. The scope of the modernization includes a full restoration of the interior and exterior of the historic building, replacement of the building's physical plant and other mechanical systems, changes to building access and egress, and the infill construction of 120,000 gross square feet located within the building's courtyards. The Commission approved the concept plans for the building modernization in February 2005 and the preliminary and final building plans in July of 2010. At the time of the July 2010 review, GSA submitted two concept design alternatives that included permanent perimeter security, designs for the E Street, NW building entrance, and possible ground floor retail along E Street, NW. GSA has chosen not to pursue the perimeter security. Instead GSA is seeking to incorporate a new at-grade entrance and the ground floor retail along E Street, NW.

Commission Action Requested by Applicant

Approval of preliminary and final site and building plan for the ground floor retail at the GSA Headquarters, pursuant to 40 U.S.C. § 8722(b)(1) and (d).

Executive Director's Recommendation

The Commission:

Approves the preliminary and final site and building plans for the ground floor retail at the GSA Headquarters building located at 1800 F Street, NW, as shown on NCPC Map File No: 23.00(38.00)43280.

Commends GSA for its efforts to include ground floor retail in lieu of permanent perimeter security at 1800 F Street, NW, and notes the potential this project has to be a model for improving accessibility to federal buildings, and for how to incorporate ground floor retail into historic buildings.

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PROJECT DESCRIPTION

Site

The General Services Administration (GSA) Headquarters building (“the project site”, “the site”) is located at 1800 F Street, NW, in the area of Washington, D.C. commonly referred to as the Northwest Rectangle. The site is bounded by F Street, NW to the north, E Street, NW to the south, 18th Street, NW to the east, and 19th Street, NW to the west. The building, originally constructed in 1917 and added on to in 1934, is a nine-story high, E-shaped structure that encompasses approximately 520,000 square feet of usable office space. The building’s E-shaped configuration creates two, paved open-air courtyards that are fully enclosed from the ground-floor to the second-floor; above the second-floor the courtyards are open along the E Street, NW side of the building. The project site is located two blocks west of the White House in an enclave of federal office buildings that was developed during the mid-twentieth century. This enclave has been determined eligible for listing in the National Register of Historic Places as the Northwest Rectangle Historic District. Other notable buildings and features within the area include George Washington University, the International Monetary Fund, and the World Bank Headquarters to the north; Rawlins Park and Whitman Park to the south; the headquarters of the American Institute of Architects and the Corcoran Art Museum to the east; and the American Red Cross to the west.

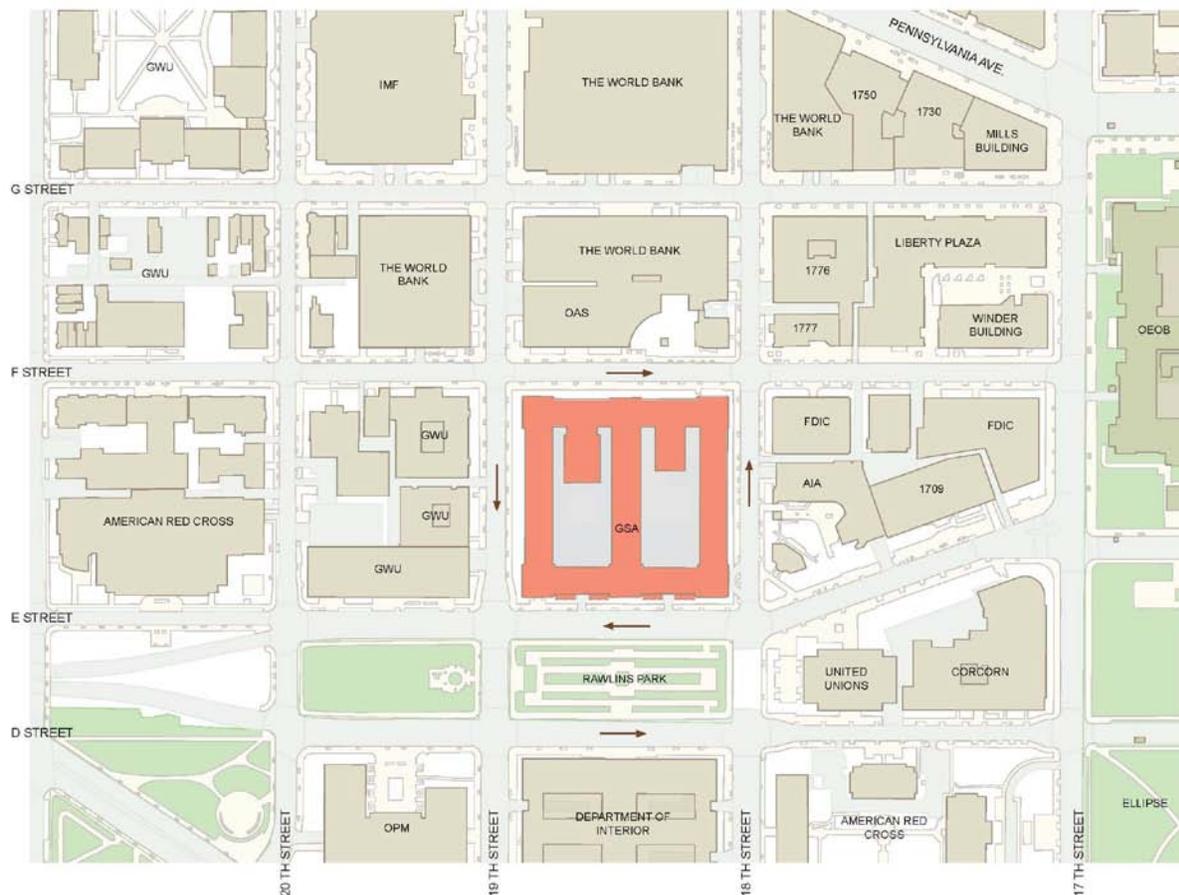
Background

At its February 3, 2005 meeting, the Commission approved the concept plans for the modernization of the GSA Headquarters building. With this approval, the Commission concurred with GSA’s proposal to create an E Street, NW entrance to improve both the function and appearance of the building. However, the Commission excepted from the approval the submitted E Street, NW entrance design with the understanding that GSA had not yet decided on an entrance design and that there were no budgeted funds for the entrance, and recommended that further study of proposed designs occur prior to the submission of preliminary site and building plans. The Commission also required that GSA submit perimeter security design with the submission of preliminary site and building plans.

At its July 1, 2010 meeting, the Commission approved the preliminary and final building plans for the base building modernization of the GSA Headquarters. Within this review, the Commission commented favorably on the proposed concept for ground floor retail along the E Street, NW side of the building; commented favorably on the proposed concept for a new formal

E Street, NW building entrance and permanent perimeter security (with the exception of the bollards located at the curblines in front of the building entrances along E Street, NW and 18th Street, NW), because the design of the proposed security elements has been integrated into existing site features and located within the building yard; and commended GSA for its efforts to include ground floor retail in lieu of permanent perimeter security, and noted the potential this project has to be a model for improving accessibility to federal buildings, and for how to incorporate ground floor retail into historic buildings.

At this July 1, 2010 meeting, the Commission also recommended that GSA continue to consult with NCPC staff and other interested stakeholders on the proposed perimeter security plan, and specifically on the design and placement of security elements at the building entrances along E Street, NW and 18th Street, NW. The Commission further noted GSA's continuing efforts to fully coordinate its projects with interested federal and local stakeholders throughout the design process, and recognized the benefit this has had on the overall design and review timeline of projects.



Project location

Proposal

The General Services Administration has submitted preliminary and final site and building plans for ground floor retail as a component of the modernization of its headquarters building located

at 1800 F Street, NW, in Washington, D.C. The scope of the modernization includes a full restoration of the interior and exterior of the historic building, replacement of the building's physical plant and other mechanical systems, changes to building access and egress including an ADA accessible entrance along E Street, NW, and the infill construction of a 120,000 gross-square-foot addition located within the building's courtyards. This proposal, focused on the E Street, NW side of the building, incorporates a new at-grade (ADA accessible) entrance and ground floor retail to the existing structure.

As the first floor of the E Street, NW side of the building is situated approximately 6-feet above the street level, to construct the proposed ground floor retail a significant portion of the first floor slab will need to be lowered to street level. With the incorporation of an internal lift at the E Street, NW entrance, this lowering of the slab will allow the entrance to be ADA accessible. A total of four street-level retail bays are proposed, two on either side of the central entrance. The bays will project approximately seven feet eight inches from the existing south façade of the building; this is approximately two-feet behind the edge of the existing areaway that surrounds the building.



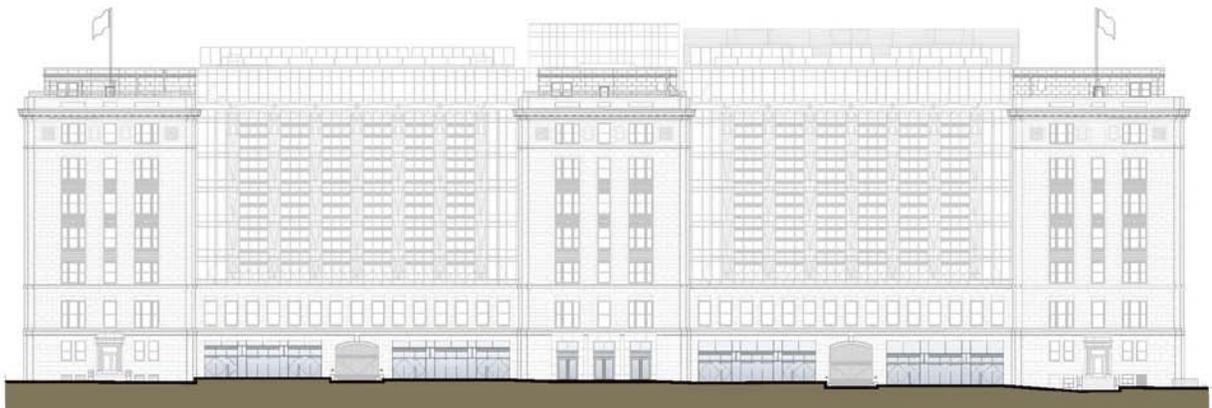
Proposed ground-floor plan with new retail and revised E Street, NW entrance

At its July 1, 2010 meeting, the Commission reviewed a concept design for the treatment of permanent perimeter security as an alternative to the current proposed E Street, NW retail and entrance plans. Since this review, GSA's Interagency Security Committee (ISC) has reassessed the necessary security level for the building and GSA has eliminated the previously proposed additional perimeter security hardened elements. For security, the current proposal includes

three retractable bollards located at the building line and across each of the two driveways located along E Street, NW (which replace existing bollards located along the property line at the driveways) and new guard booths that are integrated into the new retail spaces (behind the retail frontage).



Proposed E Street, NW façade with new retail and revised entrance (looking northwest)



Proposed E Street, NW elevation



Proposed E Street, NW façade with new retail and revised entrance (looking northeast)

PROJECT ANALYSIS

Staff supports the proposed ground floor entrance and retail along E Street, NW and finds that it would be consistent with several of NCPC's planning initiatives, such as the Legacy Plan, the Comprehensive Plan for the National Capital, the Monumental Core Framework Plan, and the recent publication entitled "Activating Federal Places." It is also consistent with GSA's Urban Development / Good Neighbor program and other policies that support the continued use of federal historic properties. NCPC has long advocated for the inclusion of retail in the ground floors of federal office buildings as a way to improve the public realm and create a lively urban streetscape. The successful implementation of the proposed ground floor retail alternative could potentially lead to similar projects in other areas of the city where there is a substantial federal presence such as the Federal Triangle and the Southwest Federal Center.

The design of the proposed ground floor retail is both sensitive to the existing historic fabric of the building, and considerate of local regulations pertaining to public space. Although the proposed retail bays will extend into public space, they will not extend further than the existing areaway that surrounds the building and therefore should not impede pedestrian access and circulation along the sidewalk.

Staff recommends that the Commission approve the final site and building plans for the ground floor retail at the GSA Headquarters building, and that the Commission commend GSA for its efforts to include the ground floor retail in lieu of permanent perimeter security and note the potential this project has to be a model for improving accessibility to federal buildings, and for how to incorporate ground floor retail into historic buildings.

CONFORMANCE

Comprehensive Plan for the National Capital

Staff finds that the overall building modernization project is not inconsistent with the Comprehensive Plan for the National Capital (the Plan). The project conforms to several of the policies contained within the Federal Workplace, Transportation, Preservation and Historic Features, and Visitors Elements of the Plan. The project aligns with several of the Plan's policies that encourage the location of workplaces on federally owned land within established urban areas that are within walking distance to transit. Furthermore, the Plan encourages the location of federal headquarters within Washington's Central Employment Area, which this project does. In addition, the project successfully carries out the Plan's policy to give consideration to the "modernization, repair, and rehabilitation of existing federally owned facilities before developing new facilities," and does so while also satisfying several policies pertaining to environmental sustainability, historic preservation, and transportation.

The proposed ground floor retail, and GSA's overall intent to make the building more publically accessible, will successfully carry out several policies of the Federal Workplace and Visitors Elements that support the balancing of security with visitor accessibility, and the location of cultural, educational, and commercial visitor attractions within federal workplaces on public streets and other pedestrian access levels.

GSA's effort to fully coordinate the overall building modernization project with the community also satisfies several Comprehensive Plan policies. Through close coordination with the District of Columbia State Historic Preservation Office, the District of Columbia Office of Planning, and DDOT, GSA has been able to design a project that meets its programmatic need to modernize and expand its headquarters, while also enhancing the design qualities and vitality of the surrounding community. The proposed ground floor retail will encourage public access to, and stimulate public pedestrian traffic around, into, and through this federal building. This is directly in line with the purpose of the District of Columbia government's recent zoning text amendment that seeks to encourage the location of ground floor retail uses within this part of the city. Finally, since the proposed retail bays will project nearly eight feet into public space, GSA has worked closely with DDOT to ensure that the bays are consistent with local public space regulations. NCPC staff has been informed that DDOT has expressed support for the design of the proposed ground floor retail.

Federal Capital Improvements Plan

The modernization of GSA's national headquarters first appeared in NCPC's 2001 – 2006 Federal Capital Improvements Plan (FCIP), and has been included in each successive FCIP since. In the 2003 – 2008 FCIP, NCPC began assigning each federal capital project to one of a set of recommendations based on the project's conformity with established federal, local, and regional planning policies. Currently, this set of recommendations includes projects that are: Recommended and Strongly Endorsed; Recommended; Requiring Additional Planning Coordination; and Recommended for Future Programming. The following table is a summary of the information contained in NCPC's Federal Capital Improvements Program pertaining to the modernization of GSA's national headquarters. As the table indicates, NCPC has consistently

“Recommended and Strongly Endorsed” the project. Projects given this recommendation are found to be critical to the strategic advancement and implementation of key NCPC planning policies and initiatives or important federal interests within the national capital region.

FCIP Year	Funding Requested (in millions)	NCPC Recommendation
2001 – 2006	43,516	Recommended and Strongly Endorsed
2002 – 2007	138,908	Recommended and Strongly Endorsed
2003 – 2008	142,614	Recommended and Strongly Endorsed
2004 – 2009	164,711	Recommended and Strongly Endorsed
2005 – 2010	179,657	Recommended and Strongly Endorsed
2006 – 2011	185,506	Recommended and Strongly Endorsed
2007 – 2012	185,506	Recommended and Strongly Endorsed
2008 – 2013	279,000	Recommended and Strongly Endorsed
2009 – 2014	292,700	Recommended and Strongly Endorsed
2010 – 2015	151,700	Recommended and Strongly Endorsed

Monumental Core Framework Plan

The project site is located within the Northwest Rectangle precinct of the Monumental Core Framework Plan’s (Framework Plan) study area. Within this area, the Framework Plan’s main objective is to improve connections lost over time due to the construction of road infrastructure, bridges, and large federal office buildings. Specifically, the plan focuses on linking the Kennedy Center with the National Mall and with the White House and President’s Park. The Framework Plan proposes to accomplish this latter objective by establishing the E Street corridor as a commemorative linear park with places for cultural enrichment and leisure activities. Due to its location along the north side of the E Street corridor, the proposed project will be a positive contributor to advancing the Framework Plan’s recommendations for the Northwest Rectangle. The proposed base building modernization will improve the overall aesthetics of the E Street corridor through the renovation and restoration of the historic GSA Headquarters, and the construction of the modern courtyard addition. In addition, the ground-floor retail at the project site will support the Framework Plan’s goal of establishing E Street as a commemorative linear park by activating the edges of the park and providing amenities that park visitors can utilize.

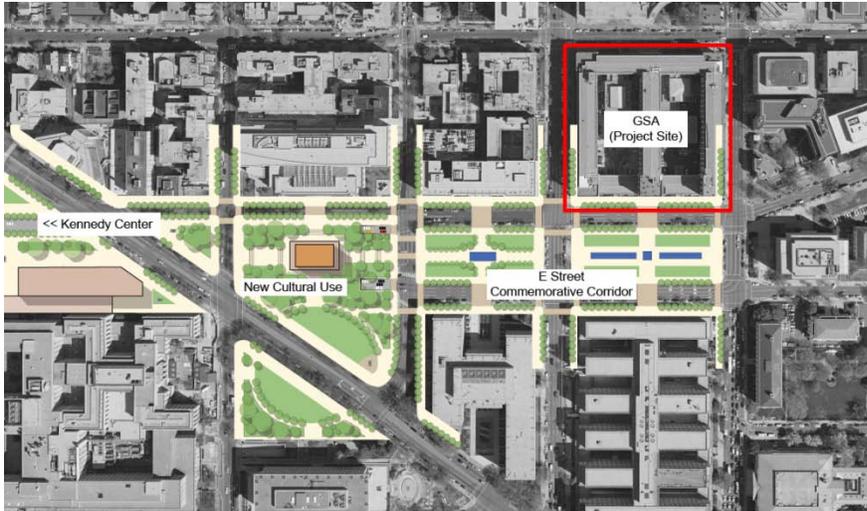


Illustration showing project site in relation to the Framework Plan's proposed E Street Commemorative Corridor

The project is also consistent with many of the Framework Plan's guiding themes and strategies. For example, the project employs some of the Framework Plan's strategies for strengthening the public realm and promoting mixed-use development. Specifically, the project will incorporate ground-floor retail and other public amenities that will spur the transformation of the E Street corridor.

National Environmental Policy Act (NEPA)

Both GSA and NCPC have an independent responsibility to satisfy the requirements of NEPA. NCPC's NEPA responsibility stems from its approval authority over the project. GSA has completed an Environmental Assessment (EA) for the project to which NCPC was a cooperating agency. The EA was prepared in accordance with the Council on Environmental Quality's regulations for implementing NEPA, the National Historic Preservation Act of 1966, GSA's Public Building Service NEPA Desk Guide, and NCPC's Environmental and Historic Preservation Policies and Procedures. In addition to a No Action Alternative, the EA analyzed two development alternatives described as "Alternative A" and "Alternative B." Alternative A includes the base building modernization and courtyard infill construction, new E Street, NW entrance, and perimeter security; while Alternative B analyzes the base building modernization and courtyard infill construction, and the ground floor retail. The EA analyzed each alternative's potential environmental impacts on 13 topic areas including:

- Land use
- Planning controls and policies
- Public space
- Economics
- Historic resources
- Visual resources
- Vehicular circulation
- Transit and pedestrian/bicycle circulation
- Air quality
- Noise
- Vegetation
- Stormwater
- Hazardous materials

On May 24, 2010, GSA issued a Finding of No Significant Impact (FONSI) for both Alternative A and Alternative B stating that “the proposed modernization of the federal building at 1800 F Street, NW is not a major Federal action significantly affecting the quality of the human environment.” GSA’s FONSI also states 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.”

Since the only component of the proposed project that the Commission took a final action on during its review on July 1, 2010 was the base building modernization and courtyard infill construction, NCPC staff focused its previous review of the EA on those particular elements of the project. At the time, staff determined that the modernization of GSA’s National Headquarters and associated courtyard infill addition will not cause significant impacts on any of the environmental topic areas analyzed in the EA. The EA identifies impacts to historic resources to be moderately adverse and long-term in duration. For the purposes of NEPA, moderate intensity impacts are not required to be mitigated. However, as a result of the Section 106 consultation process required under the National Historic Preservation Act, a Memorandum of Agreement, discussed below, has been established in order to avoid, minimize, and/or mitigate the Adverse Effects on existing historic resources caused by the project. Therefore, on June 28, 2010, after having identified no significant impacts on the human environment, the Executive Director of NCPC issued a FONSI for only the proposed modernization and courtyard infill addition.

Following review potential environmental impacts of this project proposal for ground floor retail and a new entrance on E Street, NW, on March 30, 2011, after having identified no significant impacts on the human environment, the Executive Director of NCPC issued a FONSI for only the proposed E Street, NW entrance and ground floor retail.

National Historic Preservation Act (NHPA)

GSA initially concluded the Section 106 consultation process with the District of Columbia State Historic Preservation Officer (DC SHPO) through the establishment of a Memorandum of Agreement (MOA) which was made effective on December 19, 2007. The signatories to the MOA include GSA, DC SHPO, and the Advisory Council on Historic Preservation (ACHP). According to the MOA, the scope of the Undertaking includes the “comprehensive modernization of the U.S. General Services Administration, National Office Building, located at 1800 F Street, NW, Washington, DC.” Specifically, the Undertaking includes restoration of significant interior public and executive spaces; exterior repairs; elevator upgrades; mechanical, plumbing, and life-safety improvements; perimeter security; changes to tenant spaces; and construction of an in-fill addition. Following the execution of the MOA, the scope of the project,

hence the scope of the Undertaking, was expanded to include a redesigned building entrance and possible ground floor retail along the E Street, NW side of the building.

On March 15, 2011 the MOA was amended to include within the Undertaking a redesigned building entrance and possible ground floor retail along the E Street, NW side of the building. Relative to this review of the proposed preliminary and final site and building plans for these elements, the MOA stipulates that The E Street retail additions and entrance alterations will be completed in accordance with the final illustrated designs (above) and that mitigation for the retail additions will include interpretive information on the architecture and history of the building that will be placed in the areas open to the public. 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 previously proposed additional exterior perimeter security hardened elements will be eliminated, and stipulates that site security will be limited to the retention of the existing retractable bollards on site, that existing guard booths will be removed, and new booths will be integrated with the E Street, NW retail design.

CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its June 9, 2010 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; the District Department of Transportation; the District of Columbia Department of Housing and Community Development; the District of Columbia Fire and Emergency Medical Services; and the Washington Metropolitan Area Transit Authority.

Commission of Fine Arts

At its June 17, 2010 meeting, the U. S. Commission of Fine Arts (CFA) gave final approval to the proposed interior and exterior modernization and courtyard infill addition. At the time, CFA did not take an action on the proposed concepts for the perimeter security, E Street, NW entrance, and ground floor retail additions. In general, CFA was most supportive of the proposed ground floor retail additions noting that the design of the retail bays should relate more to the architecture of the courtyard infill addition. CFA also suggested that the retail bays be refined to reduce the degree to which they remove or obscure the existing historic fabric of the building.

On October 21, 2010, CFA reviewed a revised concept for the proposed E Street, NW retail space and entrance. At this review CFA did not take a proposed action and reiterated its comments from its previous review.

At its January 20, 2011 meeting, a revised concept design for the alterations of the E Street, NW façade was approved by CFA. CFA members noted their appreciation for the response to their previous recommendations for a more careful design study and documentation and supported the revised treatment of the retail spaces in relation to the site's sloping grade, the existing historic

façade, the planned courtyard infill additions, and the treatment of the enlarged south entrance. The CFA also supported the physical expression of the of the building's historic exterior walls within the retail spaces and expressed appreciation for GSA's commitment to protect the visible character of the building through the control of internal design as well as signs for the retail tenants. A this meeting the CFA also delegated final design review to its staff.

NCPC File No. 6558



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.



Marcel C. Acosta
Executive Director