

**MARY E. SWITZER BUILDING
SITE IMPROVEMENTS AND PERIMETER SECURITY**

330 C Street, SW
Washington, DC

Finding of No Significant Impact

JUN 01 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 NCPC's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary and final site and building plans for site improvements and perimeter security at the Mary E. Switzer Building, located at 330 C Street, SW; the July 2010 Environmental Assessment (EA) prepared by the General Services Administration (GSA), including the May 2011 supplemental transportation analysis; and the comments received by GSA. Based on this evaluation I have determined that the proposal will not have a significant impact on the human environment.

Proposed Action

GSA prepared an EA, to which NCPC was a cooperating agency, to analyze the potential environmental impacts that could result from proposed site improvements and perimeter security at the Mary E. Switzer Building (the Building) located at 330 C Street, SW.¹ In addition to a No Action Alternative, the EA analyzes three development alternatives described as "Alternative A," "Alternative B," and "Alternative C". Alternative B is identified as the preferred alternative. Each of the three development alternatives includes the replacement of an existing surface parking lot with a landscaped plaza containing open space areas, a children's play area, a coffee/concession area, a ground source heat pump and other Low Impact Development (LID) techniques, and varying degrees of parking ranging from zero to twenty-eight spaces. Alternative A would eliminate the surface parking lot and provide no parking, Alternative B would provide a total of 11 parking spaces, and Alternative C would provide 28 spaces. Each alternative also contemplates the narrowing of C Street between 3rd and 4th Streets; changes to existing driveway locations; improvements to the public space surrounding the Building including new sidewalks and extensive landscaping; the construction of an architectural or public art element to conceal existing and proposed ventilation structures associated with below-grade mechanical equipment; and the construction of permanent physical perimeter security along all four sides of the Building.

In each of the three alternatives, the proposed perimeter security design largely eliminates the need for security elements in public space. Along C, 3rd, and 4th Streets, where the building yard is greater than 20 feet, the security elements have been located within the building yard or inside the sidewalk. Along D Street, where the distance from the face of the Building to the property line measures less than one foot, security elements have been located along the curb. The proposed

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

perimeter security plan also avoids the repetitive use of one security element and instead employs a variety of hardened streetscape furnishings, an approach that is appropriate for this project.

Perimeter security along C Street will be located within the building yard and consist of a hardened security fence composed of 3'3" high, 8-inch diameter, dark grey metal bollards spaced 5 feet apart on center. Between each bollard will be sections of dark grey metal fence railings. The security fence will rest upon a dark granite curb that has drainage inlets to allow stormwater to infiltrate into the bioswales planned for within the landscaped plaza. Along 3rd and 4th Streets, the perimeter security is proposed to be located along the existing inside edge of the sidewalk and consist of a hardened garden wall. The garden wall is similar in design to the security fence described above with the exception that it will also have periodic sections of limestone facing that are aligned with the windows on the Building. The sections of limestone will measure 6'8" wide. All other dimensions as to overall height of the wall and bollard size and spacing are the same as that described for the security fence.

Along D Street, the perimeter security is proposed to be located along the curb as a result an insufficient building yard width, measuring less than one foot along the entire length of the Switzer Building's south facade. Generally, the security elements will be located two feet from the edge of the curb or along the backside of existing Metrorail ventilation shafts and proposed tree boxes. The security elements will consist of a variety of hardened streetscape furnishings such as benches, bollards, bike racks, and lamp posts. Since these elements are located within public space they will be designed to relate to the surrounding urban context as required by local regulations.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment 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

There will be no significant environmental impacts as a result of the proposed action. The EA does, however, identify several areas where there will be short- and long-term minor to moderate adverse impacts caused by the proposed action and possible ways to mitigate these impacts. The EA also indicates that there will be several beneficial impacts as a result of the proposed action.

The EA analyzed 16 environmental impact topic areas. These topic areas are generally categorized as: planning policies, public space, cultural resources, visual resources, stormwater management, geophysical resources, transportation, parking, energy use and sustainability, utilities, air quality, and noise. Following the necessary procedures for analysis, public comment, and response to public comments received, GSA initially selected "Alternative B" and issued a Finding of No Significant Impact (FONSI) for this alternative on July 6, 2010. However, on April 1, 2011, following revisions to the project design, and further consultation with review agencies, consulting parties, and local

government agencies, GSA issued a revised FONSI selecting "Alternative A" on the basis that it more fully meets the purpose and need for the action. NCPC is issuing this FONSI based on the impacts identified for Alternative A.

Of the environmental topic areas analyzed, NCPC's analysis of the EA focused primarily on the potential impacts to historic and visual resources, public space, pedestrian circulation, and transportation. These areas were of particular interest to NCPC given the 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. Finally, NCPC's analysis of the transportation topic area focused mainly on the impacts of the project on the pick-up and drop-off operation of the child development center (CDC) currently located in the Switzer Building.

Minor to moderate adverse impacts to public space and pedestrian circulation will occur primarily as a result of the location of perimeter security elements along the curb on D Street. However, the removal of two existing curb cuts along 3rd and 4th Street will improve the quality of the public realm and pedestrian safety thereby having beneficial impacts. Beneficial impacts to pedestrian circulation will also occur with the installation of the public plaza, wider sidewalks on C Street, ADA compliant curb cuts, and additional street trees. To mitigate the impacts caused by the proposed perimeter security, the design has been carried out in coordination with the District Department of Transportation to ensure, to the greatest extent possible, compliance with applicable policies and procedures. In addition, to mitigate the proposed action's impacts on pedestrian circulation, extensive landscaping will take place within the building yard and surrounding public space. This will help reduce the physical appearance of perimeter security within the pedestrian environment, and provide a more pleasing pedestrian experience.

As stated above, NCPC's analysis of the transportation topic area focused mainly on the impacts of the project on the pick-up and drop-off operation of the CDC that is currently located in the Switzer Building. The EA and supplemental transportation analysis did assess the project's impacts on vehicular circulation and found that, despite the narrowing of C Street and the removal of the surface parking lot, impacts would be negligible given the relatively low existing and projected traffic volumes on the streets surrounding the Switzer Building.

In addition to studying further the potential impacts to traffic operations and safety issues, GSA's supplemental traffic impact and operation assessment dated May 13, 2011 also specifically looked at the impacts of the project on the CDC pick-up and drop-off operation. Currently, four parking spaces in the existing surface parking lot along C Street are reserved for CDC pick-up and drop-off in addition to three on-street spaces along D Street. As a result of the proposed elimination of the C Street parking lot, CDC pick-up and drop-off will be located entirely along the north curb of D Street. The supplemental study incorporated data gathered from GSA's CDC pick-up and drop-off pilot study that began on May 2, 2011. The pilot study tested the effectiveness of a number of measures taken by GSA to ensure the safe and efficient pick-up and drop-off of CDC patrons. These measures include: the provision of three curbside parking spaces reserved solely for CDC use, provision of four to five additional parking spaces for CDC use between 6:00 am and 6:30 pm, assignment of a security guard during morning and afternoon peak hours to monitor and enforce parking restrictions, distribution of special parking permits to CDC parents, installation of special signage displaying parking restrictions.

Based on the information contained in the EA, supplemental traffic study, and gathered data gathered during the pilot study, GSA made the determination that minor adverse impacts to CDC access, parking, and pick-up and drop-off would occur as a result of the project. The traffic study states that pick-up and drop-off along D Street operates efficiently and safely due primarily to: the one-way nature of D Street and larger average street width of 34 feet; a wider than average parking lane that provides additional buffer, a wider than average single travel lane of approximately 18 feet, relatively low traffic volumes along D Street, and a prominent mid-block pedestrian crossing located adjacent to the CDC entrance. In addition, the report states that the operation is further supported by GSA security personnel that monitor the area.

In addition to the information contained in GSA's EA and supplemental traffic study, NCPC conducted site visits to observe the D Street pick-up and drop-off operation during the morning and afternoon peak hours on May 18th, 19th, and 31st. During the morning peak hours of 7:30 – 9:00 am, traffic volume on D Street is low as is the overall utilization of the CDC parking spaces. In fact, much of the traffic volume on D Street at this time appeared to be CDC-related. Non-CDC motorists looking to park along D Street appear to abide by the signage that is in place, and a security guard was present at all times to enforce the restrictions, if necessary. CDC patrons appeared to be able to load and unload safely from both sides of the vehicle and the proximity to the CDC entrance helped to facilitate the turnover of vehicles. Similar observations were made during the afternoon peak hours as well. Although traffic volumes along D Street were a bit heavier during the afternoon, due to the entrance to I-395 one block east, it did not appear to create any adverse or unsafe conditions for the CDC. CDC and non-CDC motorists continued to respect the signage that is in place and the security guard was present at all times. Therefore, NCPC concurs with GSA's determination that impacts to CDC access, parking, and pick-up and drop-off would be minor. The District Department of Transportation (DDOT) has also reviewed the project and has issued a report in support. GSA has committed to working with DDOT and the CDC to make modifications to the curbside parking restrictions and signage, as necessary. In addition, GSA is currently working with DDOT on the design and installation of a speed bump near the existing mid-block crossing to further reduce vehicle speeds and alert motorist to the presence of the CDC.

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 placement of permanent perimeter security elements within the public realm along D Street will have an adverse effect on the L'Enfant Plan, and that the hardened garden wall located within the building yard on 3rd and 4th Streets, SW will have an adverse effect on the Switzer Building. In addition, it was determined that the future architectural and/or public art element(s), which are not part of the proposed action, may have an adverse effect on the Switzer Building, Cohen Building, and the L'Enfant Plan, depending on their height and mass. Finally, in consultation with the DC SHPO, GSA has determined that the installation of the ground source heat pump has the potential to disturb potential archeological resources in two locations that may be undisturbed. GSA and DC SHPO have entered into a Memorandum of Agreement (MOA) in order to avoid, minimize, and mitigate the adverse effects of the proposed action. According to the stipulations of the MOA, perimeter security elements along 3rd, 4th, and C Streets will be kept back from the curb and placed in the building yard to minimize adverse effects on these three contributing rights-of-way; the

adverse effects caused by the placement of the security elements at the curb along D Street will be minimized through the use of a variety of hardened elements including benches, bollards, bike racks and lamp posts. Finally, the MOA states that GSA will undertake an extensive revegetation program for the building yard and the adjacent public spaces fronting the surrounding streets to help mitigate the adverse effects of the perimeter security on D Street, SW.

Cumulative Impacts

With regard to the proposed site improvements, and in particular the creation of a public, landscaped plaza along C Street, the EA states that the proposal will have beneficial cumulative impacts on public space when considered together with the two memorials that are planned to be located nearby, the Dwight D. Eisenhower Memorial and the American Veterans Disabled for Life Memorial, and the site improvements that are planned or underway at Federal Office Building 8 (FOB 8) and the Cohen and Humphrey Buildings. The EA also states that long-term beneficial cumulative impacts will occur to visual resources, vegetation, stormwater management, energy use and sustainability, and vehicular circulation.

According to the EA, the proposed installation of physical perimeter security elements at the Switzer Building, when considered together with other planned or completed security projects in the area, would adversely impact the historic L'Enfant Plan by disrupting the relationship between roadways and the building yards. While the historic and visual cumulative impacts of permanent perimeter security in the vicinity of the Switzer Building may be considered moderate given the context of the immediate surroundings, such cumulative impacts might be considered significant for another project in another location. The EA acknowledges the proliferation of perimeter security in the nation's capital and also directly references several projects that are planned, have been approved, or have recently been completed. As shown in Figure 3-26 of the EA, these projects are distributed throughout a significant proportion of downtown Washington. When considered together, and analyzed for impacts on the unique context of the National Mall, Monumental Core, and the L'Enfant Plan, the potential for future perimeter security projects located outside an existing building yard to have significant cumulative impacts is growing increasingly possible.

In addition to having adverse cumulative impacts to historic resources, the EA states that the proposed perimeter security plan will also have moderate cumulative impacts on public space and pedestrian circulation. While mitigation of non-significant impacts is not required by NEPA, the impacts to public space, pedestrian circulation, and historic resources resulting from the proposal are being effectively mitigated through the design and location of the security elements and through extensive revegetation of the building yard and surrounding public space.



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