



## Executive Director's Recommendation

Commission Meeting: April 5, 2012

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**PROJECT**

Site Improvements and Perimeter Security  
Herbert C. Hoover Building, United States  
Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC

**NCPC FILE NUMBER**

7355

**NCPC MAP FILE NUMBER**

1023(38.40)43537

**SUBMITTED BY**

United States General Services Administration

**APPLICANT'S REQUEST**

Approval of comments on concept design

**REVIEW AUTHORITY**

Approval  
per 40 U.S.C. § 8722(b)(1) and (d)

**PROPOSED ACTION**

Approve comments as requested

**ACTION ITEM TYPE**

Staff Presentation

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### PROJECT SUMMARY

The General Services Administration (GSA) has submitted a perimeter security proposal for the Herbert C. Hoover Building, which is the headquarters of the Department of Commerce. Nearly all of the security elements are located at the building's property line. GSA proposal includes a cable rail system that will be concealed by stone-clad walls and piers, which will be kept to a minimum height to meet the security requirements. Portions of the cable system will be clad to appear as solid walls, and will be interrupted by a series of stone-clad piers connected by steel horizontal members that encase the cables. In addition other security elements include bollards, and reinforced light and flag poles. Repeating niches along the 14th and 15th Street elevations of the building provide opportunity for seating and way-finding.

### KEY INFORMATION

- Perimeter security project mostly within building property line
  - Consistency with NCPC's National Capital Urban Design and Security Plan
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### RECOMMENDATION

**Comments** favorably on the proposed concept design for the installation of the perimeter security elements at the Herbert C Hoover Building, located in the Federal Triangle, that includes cable rail system, bollards, active vehicle barriers, reinforced light posts, and low walls as shown on NCPC Map File No. 1023(38.40)43537.

**Commends** the General Services Administration for developing a design for perimeter security of a building in the Nation's Capital that is well integrated into the urban fabric of the surrounding streetscape.

**Recommends** that GSA explore the following as the overall design of the proposal progresses:

- Work to simplify the overall security design by minimizing the total number of different elements and amount of visual clutter.
- Create a regular / purposeful pattern and style for the security elements so that they align with certain architectural features of the building.
- Continue to refine the cable rail detail ensuring that if a horizontal element is used that it complements the architecture and historic nature of the building and landscape.
- Consult further with NCPC, CFA, and DC SHPO on the materials used to ensure that they are compatible with the historic context of the federal triangle

**Further recommends** that GSA explore the following specific ideas:

- Use a more modern looking, active vehicular barriers at the vehicular entrances
- Locate the active barriers such that vehicles waiting to be screened will not block pedestrian movements on the sidewalk.
- Allow for barriers be used only at the most active vehicle entrances and use removable bollards at inactive or infrequently-used vehicle entrances
- Incorporate perimeter security into the rear wall of the National Aquarium Entrance Pavilion, rather than the front or south wall, in order to reduce the width of the south wall and its impact on public space.
- Modify the spacing of the security elements at the Pennsylvania Avenue and 14<sup>th</sup> Street sides of the building in order to maximize pedestrian clearances and avoid the creation of narrow, unusable spaces between security elements.
- Evaluate the potential for seating along the walls at the corners of the building.

**Notes** that GSA will need to coordinate with the DDOT Public Space Committee and the National Park Service on the security elements to be located in public space.

## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	<b>September 2007</b> – The Commission approved the preliminary and final building plans for the Phase I modernization, with the exception of perimeter security and streetscape elements.  <b>June 2010</b> – The Commission approved concept design for the National Aquarium entrance pavilion with some comments on integration of the perimeter security with this project.
<b>Remaining actions</b> (anticipated)	– Preliminary and final approval of site and building plans for perimeter security at Hoover Building  – Final approval of site and building plans

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## I. PROJECT DESCRIPTION

### Site

The headquarters of the U.S. Department of Commerce, also known as the Herbert C. Hoover Building, is located at 1401 Constitution Avenue, NW (“the project site”, “the site”). The project site is located within the area of Washington, DC known as the Federal Triangle, and is bounded by Pennsylvania Avenue to the north, Constitution Avenue to the south, 14<sup>th</sup> Street to the east, and 15<sup>th</sup> Street to the west. The building is listed on the National Register of Historic Places (National Register) as a contributing structure in the Pennsylvania Avenue National Historic Site and the Federal Triangle Historic District. The site is surrounded by several cultural, recreational, and governmental uses such as: Pershing Park and Freedom Plaza to the north, the National Mall and related cultural institutions to the south, the Ronald Reagan Building and International Trade Center and headquarters to the Environmental Protection Agency to the east, and the White House and Ellipse to the west. The site of the future National Museum of African American History and Culture is located immediate south of the project site, across Constitution Avenue on the National Mall.

This building also contains the White House Visitors Center (WHVC) along Pennsylvania Avenue and the National Aquarium which will have its main entrance along Constitution Avenue, NW.

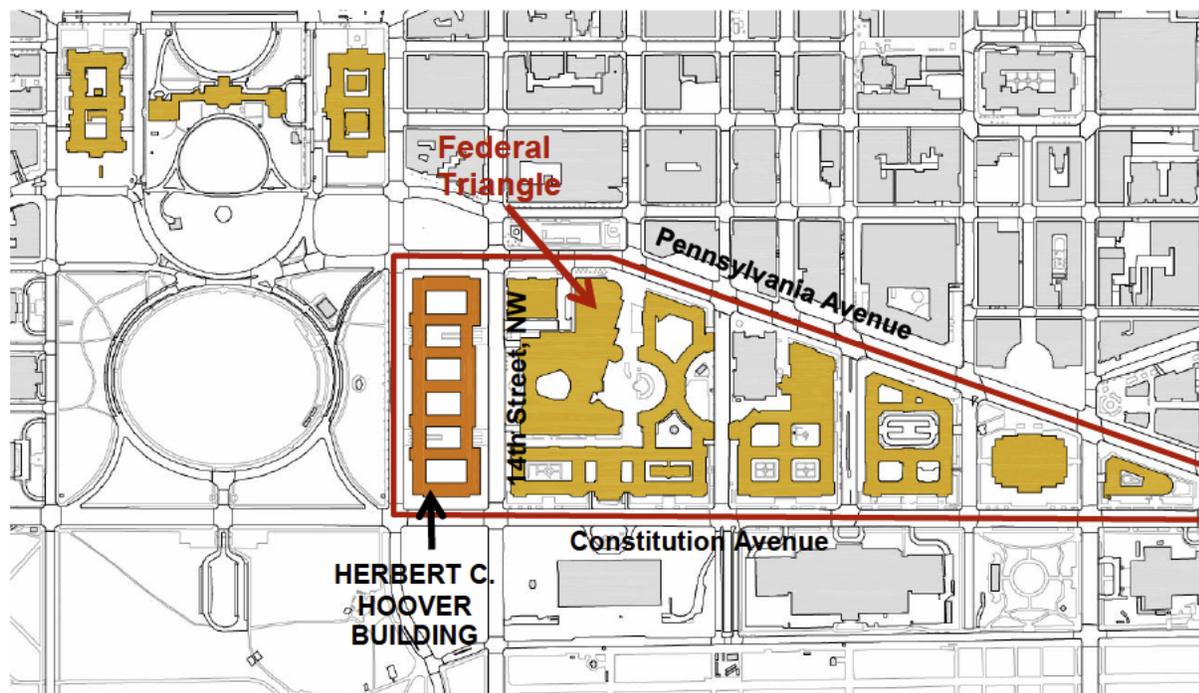


Figure 1: Federal Triangle with the Herbert C. Hoover Building Site

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## **Background**

At its March 30, 2006 meeting, the Commission provided favorable comments on the concept site and building plans for the first phase of modernization of the Herbert C. Hoover Building, with the exception of perimeter security and streetscape elements. According to the staff report prepared for this project, the scope of this phase of the modernization included the general repair of the building's interior and exterior, perimeter security, modifications and enhancements to meet current building standards and new programmatic functions, and the replacement of all major site utilities and building service infrastructure.

At its September 29, 2007 meeting, the Commission approved the preliminary and final building plans for the aforementioned Phase I modernization. In addition, the Commission reminded the General Services Administration (GSA) that it would need to conduct an Environmental Assessment (EA) to analyze the potential impacts associated with any future improvements located within public space, "including perimeter security elements and the relocation of the National Aquarium, which is anticipated to have a new entrance facility located at least in part in public space." GSA has since completed an EA for exterior improvements to the project site including the proposed entrance to the National Aquarium, ADA ramps, and permanent perimeter security. On April 6, 2010, GSA issued a Finding of No Significant Impact (FONSI) for the proposed aquarium entrance and ADA ramps only, noting that "the proposed perimeter security elements will be subject to additional NEPA analysis and/or documentation."

Most recently in June 2010, the Commission approved concept design for the National Aquarium entrance pavilion with some comments. GSA proposed a new entrance for an updated National Aquarium site located in the lower level of the Commerce Building that would be accessed off Constitution Avenue, NW. This new entry incorporated stairs at one end and ramping system on the other to provide equal access for all to the main entrance of the National Aquarium. This entrance pavilion is located in public space and therefore would need to be coordination with the District. GSA also indicated that while perimeter security was not included in the design, the southernmost wall of the entrance pavilion was designed to enable perimeter security to be integrated within it in the future.

## **Proposal**

The General Services Administration (GSA) has submitted a proposal for perimeter security for the Herbert C. Hoover, Department of Commerce Building (Commerce Building). This proposal includes most of the security elements located at the building's property line. The distance of these elements from the building ranges from approximately 12 feet to 44 feet. The proposal allows the secure perimeter to be located away from the building while limiting the physical interface between the existing and historic building elements and the new perimeter security elements. The exceptions are the portions of the perimeter security elements along the Pennsylvania Avenue side of the building and those along the Constitution Avenue side of the building, see Figure 2. Along both of these sides the property line is less than 20 feet.

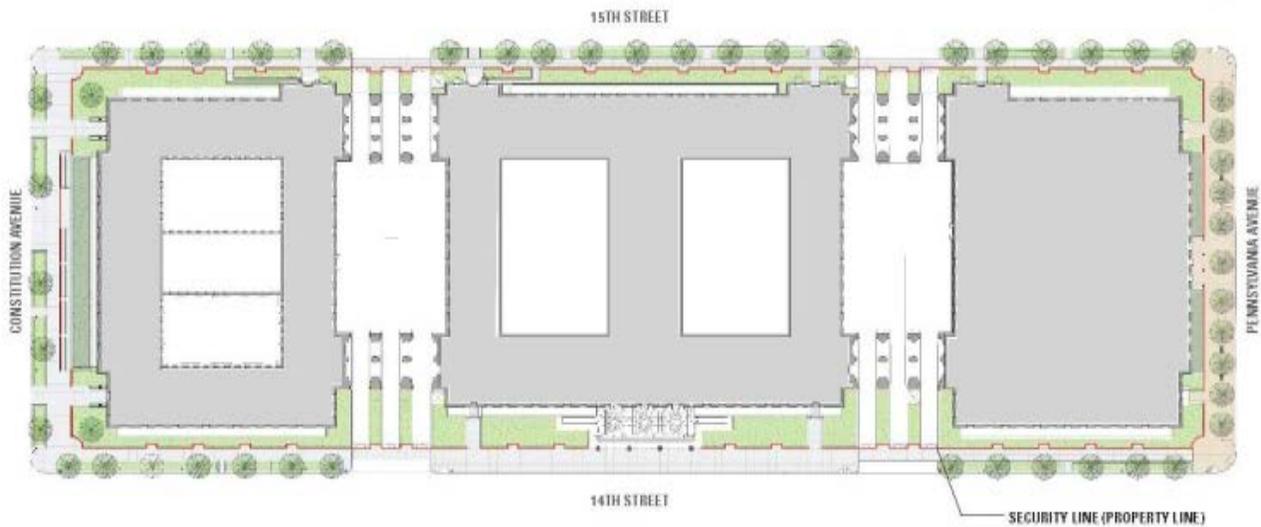


Figure 2: Perimeter Security- Concept Site Plan

### Security Elements

GSA is proposing a cable rail system that will be concealed by stone-clad walls and piers, which will be kept to a minimum height to meet the security requirements. Currently, the total height of the proposed system is 36 inches, which consists of a 30 inch pier set on top of a 6 inch base. GSA notes that “terminal” piers (ones that mark a transition to another security element) will incorporate an additional 6 inch cap for a total height of 42 inches, while “interim” piers will not include the cap.

Portions of the cable system will be clad to appear as solid walls, and will be broken by a series of stone-clad piers, both interim and terminal, connected by steel horizontal members that encase the cables. Bollards will be the internal structure of the stone walls and piers. A curved metal element will be integrated into the design to soften the long horizontality of the project. Repeating niches along the 14th and 15th Street elevations of the building provide an opportunity for seating and way-finding. The niches are set 30 inches into the property line and provide an occasion for both visitors and guests to pause. GSA states that the repetition of the fence panels, piers and niches respond to the repetition and symmetry of the stone piers and windows on the historic building.

Bollards, spaced at least 4 feet on center, will also be used at pedestrian entrances along all sides of the building. Some of the bollards along Pennsylvania Avenue entrance will be removable to allow for vehicle access to the WHVC for exhibits which will be installed periodically at the WHVC. Delta barriers will be used at the vehicular entrances which are along both 14<sup>th</sup> and 15<sup>th</sup> Streets, NW. There are existing delta barriers securing the vehicular entrances.

### Detailed Areas

The following areas identify each of the main segments of the proposed perimeter security: the WHVC along Pennsylvania Avenue; the 14<sup>th</sup> Street main pedestrian building entrance; the future National Aquarium pavilion entrance along Constitution Avenue; and the typical segment along

14<sup>th</sup> and 15<sup>th</sup> Street. These segments depict the varied approach to perimeter security for the entire building.

The perimeter security elements proposed at the entrance to the WHVC include bollards and reinforced light posts that allow for easy pedestrian access by the public as depicted in Figure 3. On either side of this entrance will be low solid walls for seating as well as landscaped areas. These security elements are set back from the building façade by 12 feet – 8 inches. These low walls eventually transition to the cable rail system with piers connected by horizontal steel members. At 14<sup>th</sup> and 15<sup>th</sup> Streets, the perimeter security turns the corner with quarter-circle walls. This design along the main entrance to the WHVC is depicted in Figure 4.



*Figure 3: Pennsylvania Avenue – White House Visitor's Center Entrance*

As this entire Pennsylvania Avenue façade of the building is either along or outside the building property line, all of the security elements along this part project will be located in public space. The security elements will be located 30 feet – 4 inches from the face of the curb, allowing for nearly all of the existing trees and street furniture to remain.

Four of the fifteen existing trees along the Pennsylvania Avenue side of the building in front of the WHVC will need to be relocated along another part avenue to allow this design to be installed. These trees are currently located on either side of the WHVC entrance. In addition there are four lights that require relocation as well. GSA notes that the location of these permanent security measures will not interfere with any events occurring along Pennsylvania Avenue including Presidential Inaugurations.

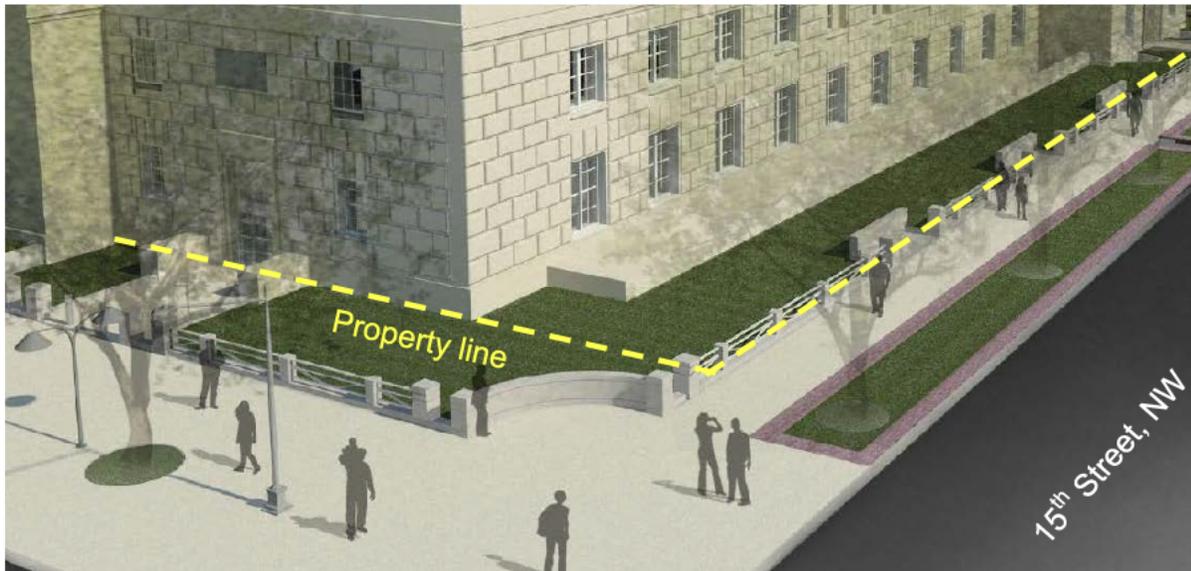


Figure 4: Transition from Pennsylvania Avenue to 15<sup>th</sup> Street, NW –Bird's eye view

Along 14<sup>th</sup> Street, NW, GSA is proposing the cable rail system for most of the length of the street. At the main pedestrian entrance along the street, the cable rail system will be transitioned to bollards with four reinforced flagpoles integrated into the security scheme. These are existing flagpoles. Ramps providing Americans with Disabilities Act (ADA) access to the Commerce Building also flank this main pedestrian entrance approved by the Commission in July 2010.



Figure 5: 14<sup>th</sup> Street - Pedestrian Entrance, Street level view

### National Aquarium

As part of another project submitted by GSA and reviewed by the Commission at its July 2010 meeting, the National Aquarium will be relocated within the Hoover Building from the north

side to the basement level. The main entrance to the National Aquarium will be along Constitution Avenue - the southern side of the building. The Commission provided comments to GSA on the concept design of this project in July 2010 and noted that while perimeter security was not included in the design that it should be integrated as much as possible as that design process progressed. GSA has reinforced the southern wall of the National Aquarium Entrance Pavilion and it will serve as part of the perimeter security barrier. The National Aquarium Entrance Pavilion project is not part of this design and will be submitted separately for Commission review in the future. The submitted concept design for perimeter security incorporates security elements along the southern wall of the entrance pavilion as well as a bollard located at the top of the ramp and another at the top of the stairs at the mid-point. These security elements are all located in public space.

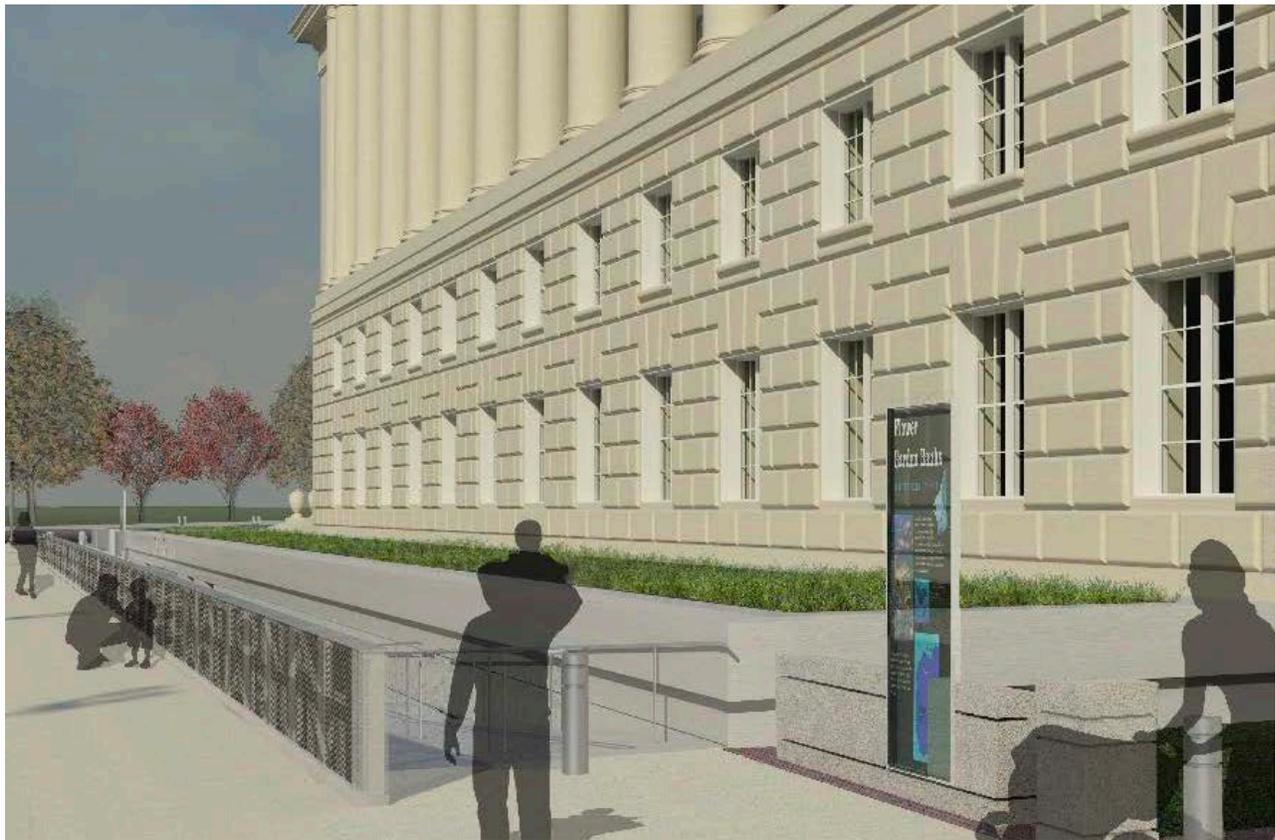
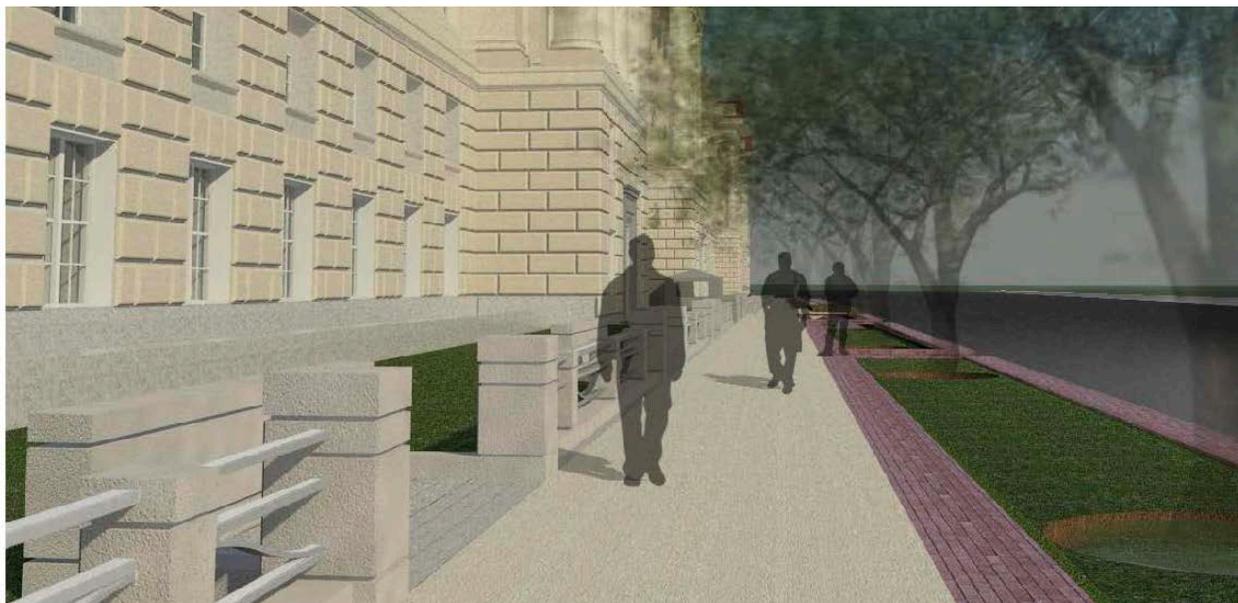


Figure 6: Constitution Avenue – National Aquarium Pavilion Entrance, Street level view



*Figure 7: 14<sup>th</sup> Street - Pedestrian Entrance, Street level view*

Finally the typical streetscape perspective shown in Figure 7 depicts the pedestrian flow along 14<sup>th</sup> and 15<sup>th</sup> Streets, NW. GSA is proposing to maintain the existing sidewalks along 14<sup>th</sup> Street and 15<sup>th</sup> Street, 8 and 11 feet respectively. In addition, the current width of the tree planting areas along the street will also be maintained. Lawn panels will occur inside the secure perimeter along with some low landscaping. Niches are incorporated periodically into the perimeter wall along 14<sup>th</sup> and 15<sup>th</sup> Street, NW and these will serve as places to stand or sit for short periods of time.

## II. PROJECT ANALYSIS/CONFORMANCE

### Executive Summary

GSA identified the need for permanent perimeter security measures for the Federal Triangle precinct and has been working as part of the Interagency Security Committee and staff is encouraged by this proposal for perimeter security for the Herbert C. Hoover Building. This particular proposal is important because it begins to establish some very important ideas which may be replicated in other parts of the Federal Triangle precinct. These ideas include locating perimeter security measures at the building property line; balancing security needs with the maintenance of public access to public facilities, and integrating perimeter security with architectural features. Staff would like to acknowledge that this concept design provides a strong framework on which to build the design of the perimeter security elements. Therefore the Executive Director recommends that the Commission **comment favorably on the proposed concept design for the installation of the perimeter security elements at the Herbert C Hoover Building, located in the Federal Triangle, that includes cable rail system, bollards, active vehicle barriers, reinforced light posts, and low walls** and

Previous proposal for perimeter security for Commerce Building from April 2006 included security elements approximately 4 feet from the curb. This would have allowed nearly all of the public space to be located within the secure perimeter. Since the current concept proposal has reduced the impact to public space considerably by moving the perimeter security closer to the building, staff recommends that the Commission **commend the General Services Administration for developing a design for perimeter security of a building in the Nation's Capital that is well integrated into the urban fabric of the surrounding streetscape.**

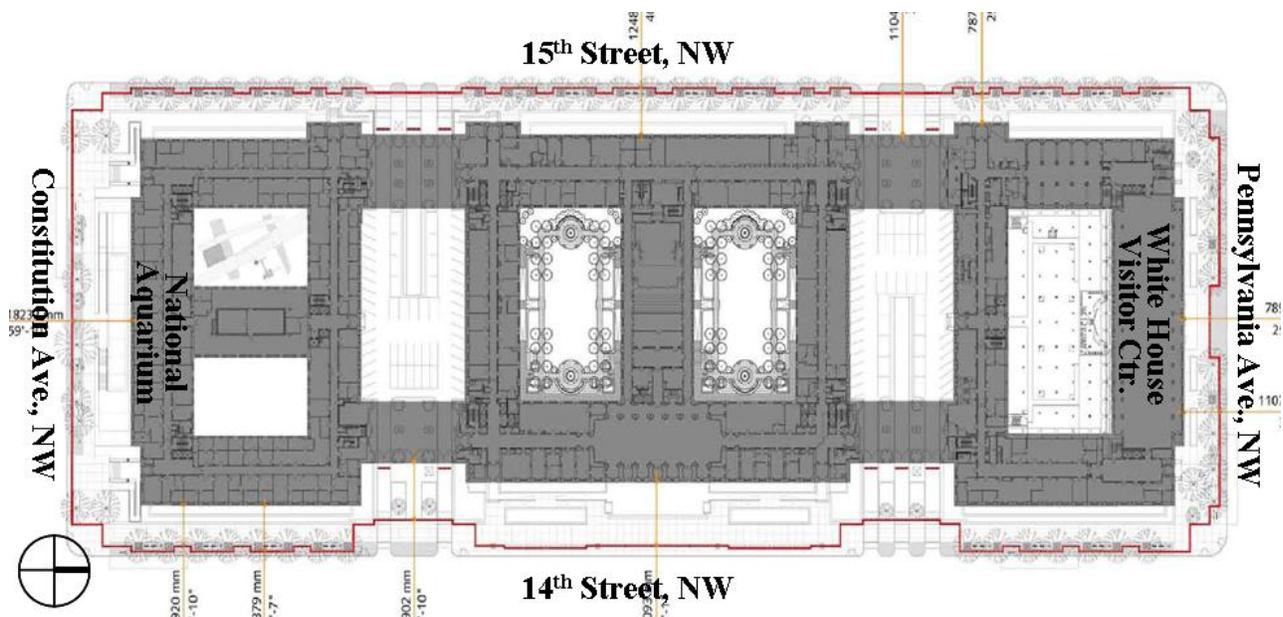


Figure 8: April 2006 Plan for Commerce Building Perimeter Security

In addition there are some comments staff would make regarding the project as GSA continues to further develop it regarding general placement of elements as well as exploring specific aspects of the proposal itself.

### **Analysis**

As this is still a concept design staff has identified some areas for further study associated with this perimeter security project. These recommendations are separated into overall comments for the project and specific comments that pertain to individual areas.

While staff appreciates that GSA has submitted a project incorporating new security standards into the design, the rhythm of the elements and transitions from one element to the next seem a bit cumbersome. For instance, there are many different types of core elements: piers, cables, niches, walls, corners, and bollards. In addition, there are a number of additional elements too such as flag poles, light posts, active vehicle barriers, and the aquarium's south wall which will be a unique feature as well. These various elements make the transitions important.

Subsequent designs should look to simplify the type of elements to reduce the apparent clutter. While it's apparent that some effort was made in the design to mimic the rhythm included in the building façades, a more apparent relationship needs to be established between the perimeter security element placement and the building façades. Exploring this relationship will be important in making a stronger connection between these two elements. In addition, the building architecture should be further analyzed to help identify a horizontal element that will help tie the design together while complementing the architecture itself. These decisions should be explored jointly with DC SHPO, CFA and NCPC staff.

Therefore, it is the Executive Director's recommendation that the Commission **recommends that GSA explore the following as the overall design of the proposal progresses:**

- **Work to simplify the overall security design by minimizing the total number of different elements and amount of visual clutter.**
- **Create a regular / purposeful pattern and style for the security elements so that they align with certain architectural features of the building.**
- **Continue to refine the cable rail detail ensuring that if a horizontal element is used that it complement the architecture and historic nature of the building and landscape.**
- **Consult further with NCPC, CFA, and DC SHPO on the materials used to ensure that they are compatible with the historic context of the federal triangle.**

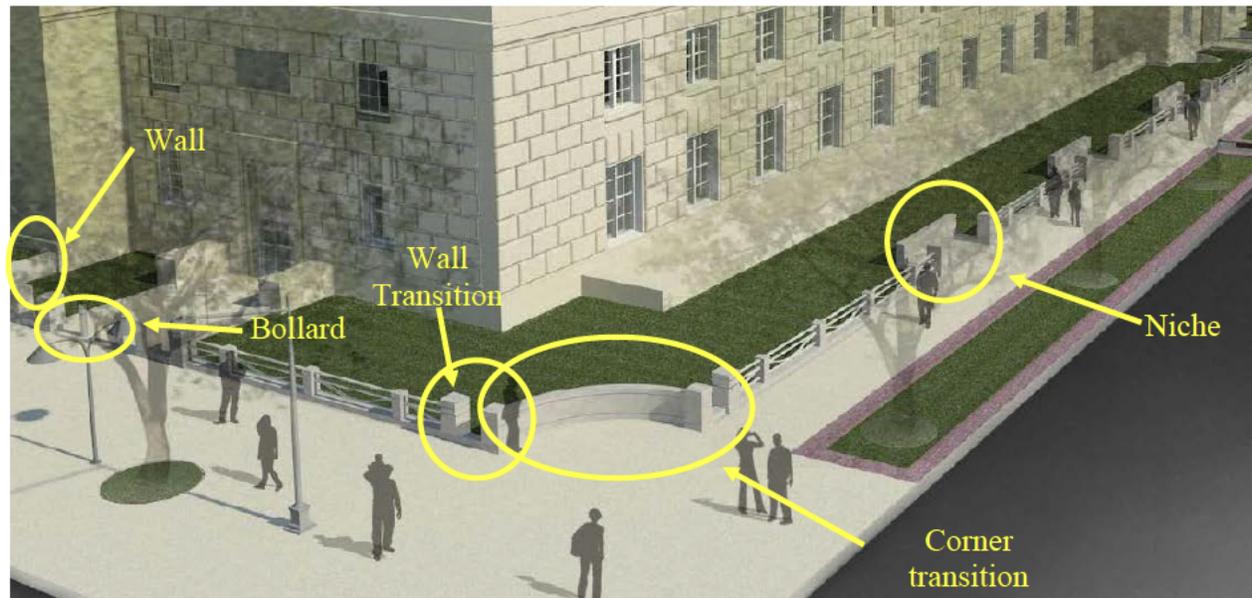


Figure 9: Transitions and variety of elements

Regarding specific areas, staff has identified the following to be developed further because the transitions are awkward between the various security elements. These transitional areas requiring further design refinement occur around the entire building and affect pedestrian flow, vehicular flow or public space. These recommendations are listed as follows:

- Use a more modern-looking, active vehicular barriers at the vehicular entrances
- Locate the active barriers such that vehicles waiting to be screened will not block pedestrian movements on the sidewalk.
- Allow for barriers be used only at the most active vehicle entrances and use removable bollards at inactive or infrequently-used vehicle entrances
- Incorporate perimeter security into the rear wall of the National Aquarium Entrance Pavilion, rather than the front or south wall, in order to reduce the width of the south wall and its impact on public space.
- Modify the spacing of the security elements at the Pennsylvania Avenue and 14<sup>th</sup> Street sides of the building in order to maximize pedestrian clearances and avoid the creation of narrow, unusable spaces between security elements.
- Evaluate the potential for seating along the walls at the corners of the building.

### **Comprehensive Plan for the National Capital**

Overall, the project conforms to the policies of the Federal Elements of the Comprehensive Plan for the National Capital, and in particular those contained in the Federal Workplace, Transportation, and Federal Environment Elements. These policies encourage the federal government to modernize, repair, and rehabilitate existing federal workplaces within the monumental core; promote pedestrian activity; and provide welcoming, publicly accessible, sustainable places to work and visit. The proposed site improvements, together with the

modernization of the existing building, will satisfy each of these areas. The renovation and modernization of the Commerce Building will provide additional high-quality federal office space within the monumental core, while the proposed site improvements will provide a comfortable outdoor space for the workers within the building and throughout the surrounding area.

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 restrict pedestrian mobility.

### **Federal Capital Improvements Program**

The Commission recommended and strongly endorsed the Herbert C. Hoover Building Modernization as well as the following projects as noted in the Federal Capital Improvements Program for Fiscal Years 2006-2011:

- The Federal Triangle and Pennsylvania Avenue (3<sup>rd</sup> to 15<sup>th</sup> Streets, NW) Perimeter Security and Streetscape Improvements
- The Constitution Avenue (3<sup>rd</sup> to 15<sup>th</sup> and 17<sup>th</sup> to 23<sup>rd</sup> Streets, NW) Perimeter Security and Streetscape Improvements

This project was not included in the FCIP for FY 2011-2016, the most recent program approved by the Commission.

### **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 the Commerce Building. 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 policies pertaining specifically to the location and design of security elements. 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 this project, GSA is proposing to locate perimeter

security on-site, or within the existing property line, on the east and west along both 14th and 15th Streets.

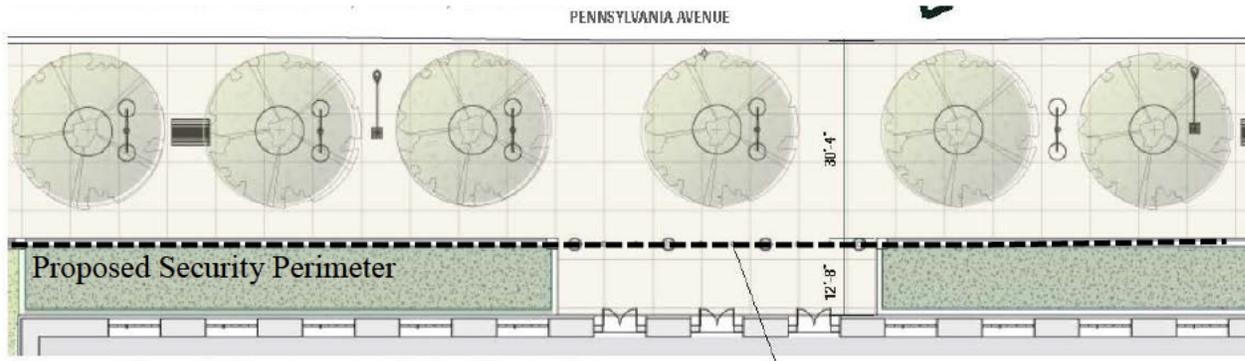


Figure 10: White House Visitor's Center Entrance and Security Perimeter – Site Plan

Along Pennsylvania Avenue at the WHVC main entrance, however the building façade is either at the property line or over it - a portion of the building is actually located in public space – so the building yard is less than 20 feet. Therefore, GSA is proposing that the secure perimeter be located in public space. The distance of the perimeter security from the building face will range between 12 feet - 8 inches and 24 feet. The remaining public space along Pennsylvania Avenue will be 30 feet – 4 inches that includes areas for benches, light poles and walking.

Also, along Constitution Avenue (see Figure 10), the established planting areas on either side of the existing pedestrian entrances to the Commerce Building will be extended into public space as part of the National Aquarium Entrance Pavilion project. Since the building yard is less than 20 feet and as described earlier, the proposed security perimeter will be integrated into the new planting areas and Entrance Pavilion design. The secure perimeter will be 38 feet from the building. The public space will be 27 feet wide, which includes a 13 foot sidewalk and a 14 foot tree planting area.



Figure 11: National Aquarium Entrance Pavilion with Property Line and Security Perimeter – Site Plan

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### **Monumental Core Framework Plan**

Staff finds that the proposed concept for perimeter building security is consistent with the goals and objectives of the Monumental Core Framework Plan (Framework Plan). The project site is located within the Federal Triangle precinct of the Framework Plan study area. Within the Federal Triangle, the Framework Plan seeks to improve connections between downtown and the National Mall by establishing new destination along Pennsylvania Avenue, and by enhancing the public realm. Locating the perimeter security for the Department of Commerce Building along the building property line and not out at the curb will help to provide a pleasing barrier free transition between downtown, the Federal Triangle, and the monumental core.

### **National Environmental Policy Act (NEPA)**

GSA developed an Environmental Assessment (EA) for the Building Modernization project and intends to revise this document and issue a new Finding of No Significant Impact for this project. NCPC has its own NEPA responsibilities and will use this revised EA to base its environmental review as required to fulfill its obligations.

### **National Historic Preservation Act (NHPA)**

The Federal Triangle, conceived in the McMillan Plan, is listed in the National Register of Historic Places. Part of the Pennsylvania Avenue National Historic Site, the Triangle was designated for its exceptional architectural and planning significance and for its contribution to the image of the federal government in the Nation's Capital.

The Commerce Building is the largest building in the Federal Triangle. Constructed between 1926 and 1932, it was said at the time to be the largest government building in the United States. Clad in Indiana limestone with the characteristic red-orange tile roof of Federal Triangle buildings, the building expresses the Renaissance Revival and Beaux Arts styles, especially in plan, and in its rusticated base, graduated fenestration pattern, and colonnades of monumental Doric columns.

As this is early in the process, GSA has not engaged with the District of Columbia State Historic Preservation Office and staff would encourage GSA to begin this dialog in compliance with its Section 106 of the National Historic Preservation Act responsibilities. NCPC staff will participate in this process.

## **III. CONSULTATION**

### **Coordinating Committee**

The Committee reviewed the proposal at its March 14, 2012 meeting, and forwarded the proposed concept design to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

**Commission of Fine Arts**

GSA is intending to submit this project at a concept level to the Commission of Fine Arts for review its April 2012 meeting.