



Executive Director's Recommendation

Commission Meeting: February 7, 2013

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 revised
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

PROJECT SUMMARY

The General Services Administration (GSA) has submitted a revised perimeter security proposal for the Herbert C. Hoover Building, which is the headquarters of the Department of Commerce. While the security elements were located at the building yard in the April 2012 proposal submitted by GSA, this current proposal includes some perimeter security elements located in public space.

Consistent with the previously approved concept, perimeter security will be provided by a cable-rail system that is concealed by a combination of stone-clad walls and piers connected by steel horizontal members that encase the cables. The primary difference between the two concepts is the siting of some security elements in public space along both 14th and 15th Streets, NW. The applicant recognizes that this is inconsistent with existing Commission policies against security elements in public space, but is requesting an exception based on site conditions and the provision of public benefits as mitigation.

KEY INFORMATION

- Change was made in an effort to break up a continuous line of security elements extending nearly 1,200 feet along the edge of the building yards on 14th and 15th Street
 - Design includes features designed to enhance pedestrian experience, support alternative means of transportation, and capture and treat storm water runoff
 - Existing Commission policies oppose perimeter security elements in public space, but applicant is requesting an exception
-

RECOMMENDATION

The Commission:

Notes the Commission policy stating that “for existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet”

Notes that the proposed perimeter security elements located along Pennsylvania Avenue, NW and Constitution Avenue, NW are consistent with this policy and have not significantly changed from what was proposed in April 2012

Notes that the proposed perimeter security elements that are in public space along 14th Street and 15th Street, NW are not consistent with this policy

Notes that the unique site conditions - a significant increase in pedestrian traffic from three tourist destinations opening in close proximity to this site and both 14th and 15th Streets, NW being nearly 1,200-foot-long blocks - may justify an exception in this case, and therefore

Agrees to consider a partial exception to this policy for the perimeter security elements located in public space, on the condition that the applicant is able to demonstrate, in future submissions, that the public benefits provided outweigh the impact of the security elements in public space by:

- Complying with policies stating that where security barriers in public space cannot be avoided they should be integrated into the urban landscape in a manner that minimizes their visual impact and physical infringement into public space
- Supporting the recommendations of the Monumental Core Framework plan by improving the pedestrian experience along Pennsylvania Avenue and in the Federal Triangle through the provision of seating and shade and plantings that provide seasonal interest, and by enhancing perceived safety through the provision of pedestrian-oriented lighting and protection from vehicular traffic
- Further supporting the recommendations of the Monumental Core Framework plan by introducing sustainable public spaces through the use of low impact design to capture and mitigate storm water runoff
- Providing a pedestrian environment that is free from obstruction by eliminating bollards that cross the pedestrian path
- Ensuring that pavement materials and streetscape elements are consistent, as appropriate, with the design guidelines for Pennsylvania Avenue, the Mall Streetscape Plan, and the District of Columbia Streetscape Design Guidelines
- Coordinating elements in public space with the District of Columbia's Department of Transportation

PROJECT REVIEW TIMELINE

Previous actions	
	September 2007 – The Commission approved the preliminary and final building plans for the Phase I modernization, with the exception

	<p>of perimeter security and streetscape elements.</p> <p>June 2010 – The Commission commented favorably on the concept design for the National Aquarium entrance pavilion with some comments on integration of the perimeter security with this project.</p> <p>April 2012 – The Commission commented favorably on the concept design for perimeter security elements located along the building yard.</p>
Remaining actions (anticipated)	<ul style="list-style-type: none"> – Preliminary approval of site and building plans – Final approval of site and building plans

Prepared by Carlton Hart
 2/7/2013

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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 (“project site”, “Hoover Building”). 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, 14th Street to the east, and 15th Street to the west. While both the Constitution Avenue and Pennsylvania Avenue sides of the building are 415 feet (the length of normal city blocks), the 14th and 15th Street, NW sides of the building are approximately 1,169 feet long – more than twice the distance.

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.

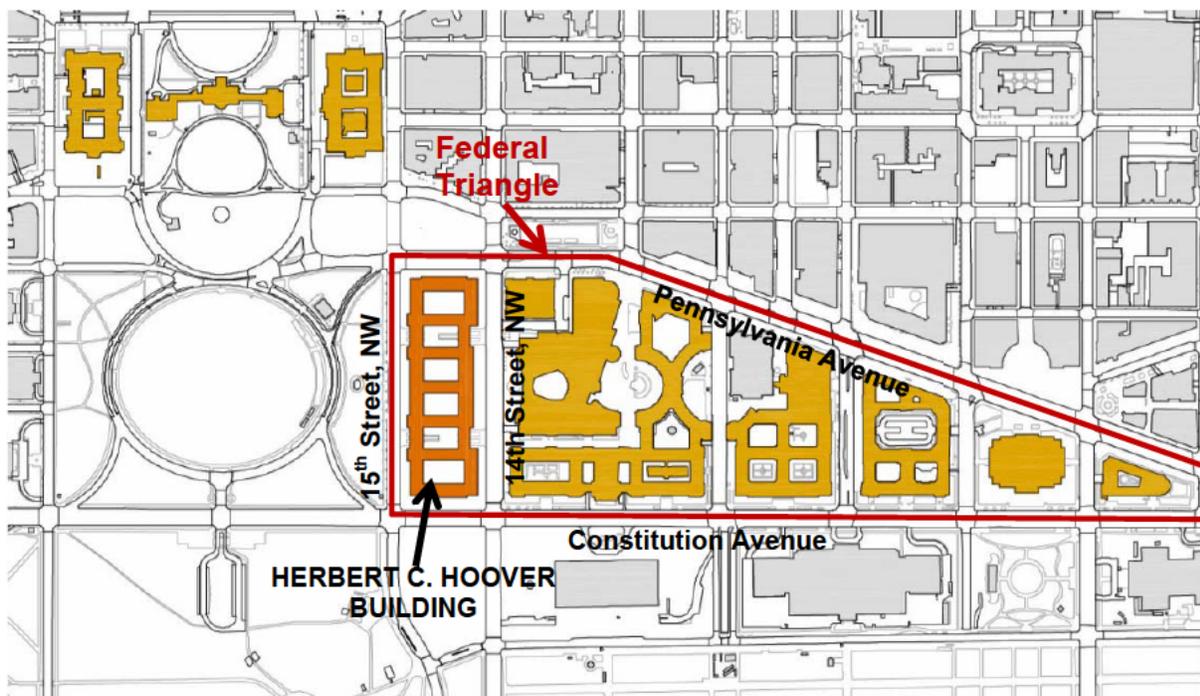


Figure 1: Federal Triangle with the Herbert C. Hoover Building Site

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.

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."

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 Hoover 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.

Most recently in April 2012, the Commission commented favorably on a concept design for perimeter security elements located at the building yard. At that time, the Commission recommended that GSA explore the design further by simplifying the number of elements and relating it more to the building, relocate elements that interrupt pedestrian movements, and continue working with the various stakeholder agencies.

Proposal

The GSA has resubmitted a concept design for perimeter security for the Herbert C. Hoover, Department of Commerce Building. During the past eight months GSA staff has reassessed the previous design and in the project report GSA states "...it became clear that attempts to simplify and minimize the visibility of perimeter security were developing instead into a fragmented collection of disparate individual parts." GSA refocused the design stating the following objectives:

- Meets the security requirements identified by the ISC and the Department of Commerce
- Complements the style and scale of the building and site
- Introduces improvements to the public realm

This last objective of 'introducing improvements to the public realm' led GSA to develop a design that:

- moves the perimeter security line from the building yard to the back of the tree strips and back to the building yard,
- provides public seating areas on 14th and 15th Streets,
- removes the barrier between the pedestrian and the building
- allows Capital Bikeshare stations to be integrated into the wall
- installs low impact development elements along several tree strips on 14th and 15th Street,

The revised perimeter security wall 'undulates' between an alignment at the building yard and an alignment that is located in public space on the edge of the tree strip. Because of the alignment of the perimeter security and the recessed portions of the building façade, the distance of these security elements from the building ranges from approximately 12 feet to 44 feet.

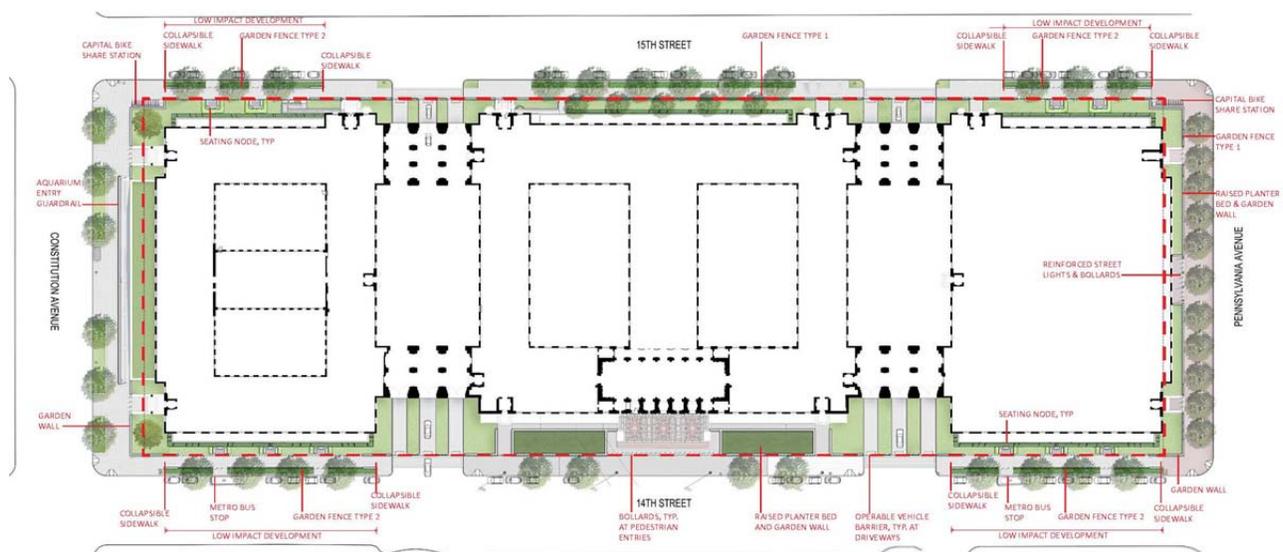


Figure 2: Perimeter Security- Revised Concept Site Plan

Security Elements

GSA is still 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, this concept design includes two separate garden fence styles that will encase the cable-rail system – Type 1 and Type 2. The total heights of the proposed system are 34 inches for Type 1 and 32 inches for Type 2. For Type 1, the 12-inch wide “interim” piers are 10 feet apart and connected by several cable-rails encased in metal sleeves. GSA notes that “terminal” piers (ones that mark a transition to another security element) will be an additional 4 inches taller, for a total height of 36 inches. A stone curb will be installed between the bases of the Type 1 piers to visually connect them. The Type 2 piers will not have any curb installed between them.

Portions of the cable-rail system will be clad to appear as solid walls, particularly near building entrances, while the rest of the cable-rail system will visually seem more open or porous. Bollards will be the internal structure of the stone walls and piers.

Bollards, spaced five 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. Inverted U-shaped vehicle barriers are being proposed at the vehicular entrances along both 14th and 15th Streets, NW.

Detailed Site Descriptions

The following areas identify each of the main segments of the proposed perimeter security: segment along 14th Street and 15th Street, NW; the WHVC along Pennsylvania Avenue; the 14th Street main pedestrian building entrance; and the future National Aquarium pavilion entrance along Constitution Avenue. These segments depict the varied approach to perimeter security for the entire building.

14th and 15th Streets, NW

GSA is proposing several design changes along 14th and 15th Streets, which are each 1,165 feet in length from Pennsylvania Avenue to Constitution Avenue, NW. GSA states that these changes are in response to the comments from this Commission, CFA and the District of Columbia and are being proposed to make the sidewalks more pedestrian-friendly streetscapes. GSA describes the existing conditions as a long and monotonous stretch of sidewalk. GSA also states that the new design introduces several pedestrian plazas, two Capital Bikeshare Stations, seating and low impact development elements, as well.

The streetscape perspective shown in Figure 3 illustrates the sidewalk along 15th Street, NW. GSA's proposal will include 10-foot wide sidewalks along 14th Street and 15th Street. Tree planting areas would be included along both streets and will replace existing street trees. GSA states that the existing trees “...show signs of decay, tree canopy reduction, and die back...” Along 14th Street, GSA is proposing 440 linear feet of low impact development (LID) and 310 linear feet of LID along 15th Street. While these areas have not been designed, they will include street trees and low-scale plantings which will capture stormwater from the adjacent sidewalk. Landscaped panels will occur inside the building yard. Seating areas are incorporated into the design adjacent to the sidewalk at the northern and southern ends of 14th and 15th Street, NW.

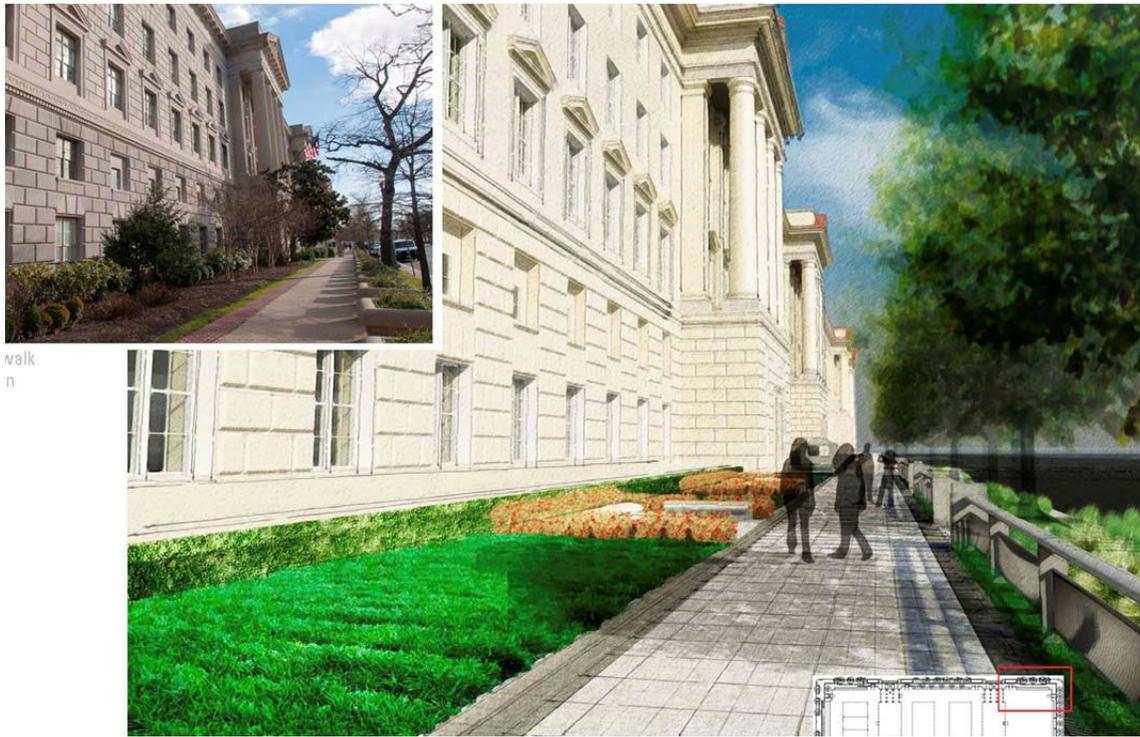


Figure 3: View looking south along 15th Street, Street level view

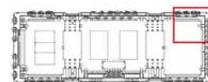
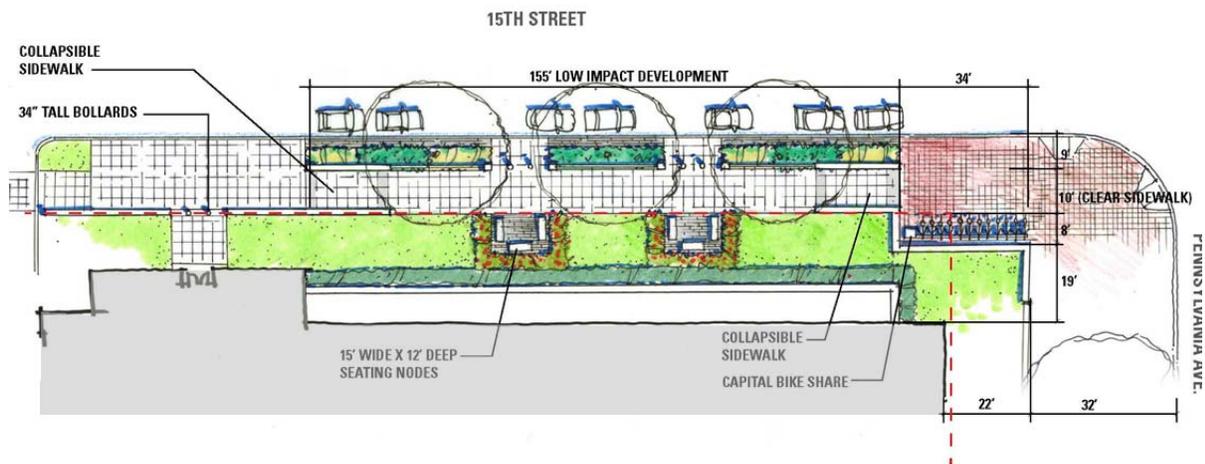


Figure 4: Detailed Site Plan - Corner of 15th Street, NW and Pennsylvania Avenue.

White House Visitor's Center (WHVC) Entrance

The design of the perimeter security elements proposed at the entrance to the WHVC are the same as those previously proposed in April 2012. These elements consist of bollards and reinforced light posts that allow for easy pedestrian access by the public. On either side of this entrance will be low solid walls for seating as well as landscaped areas as depicted in Figure 5. 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.

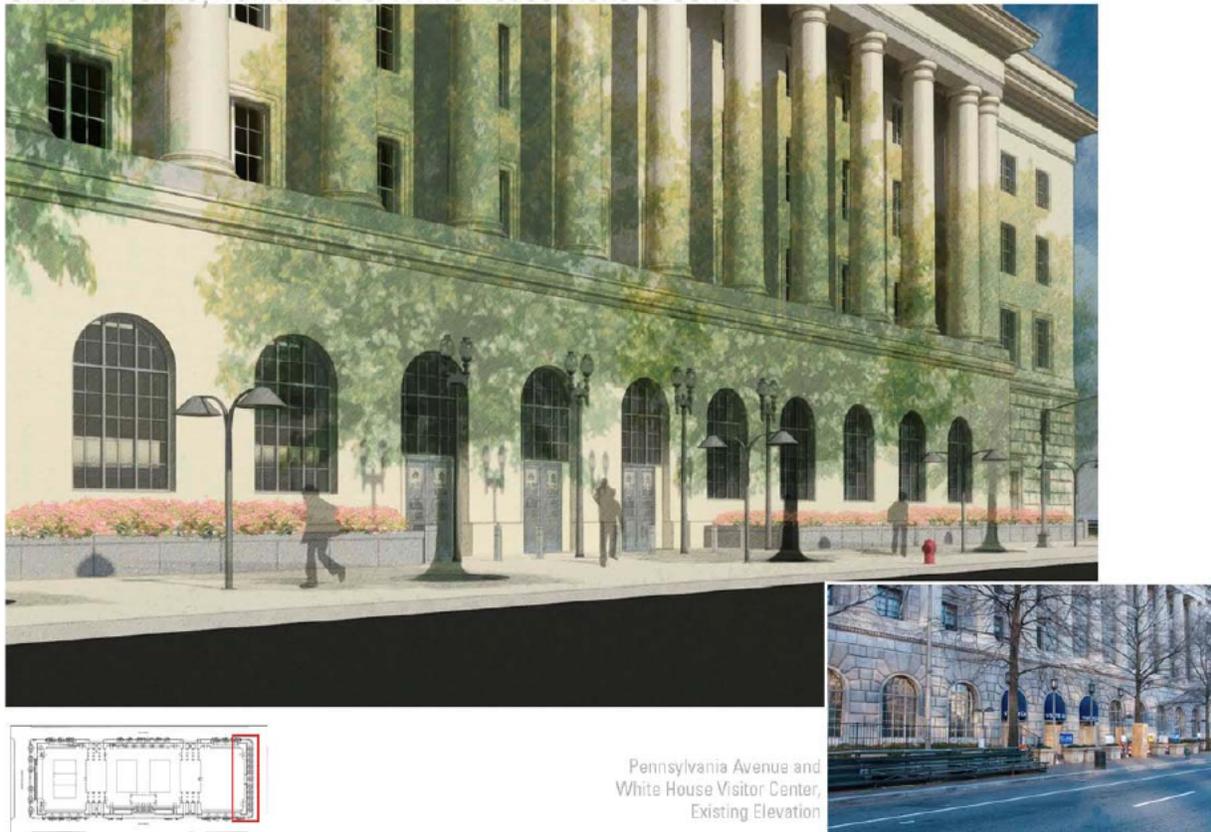


Figure 5: Pennsylvania Avenue – White House Visitor's Center Entrance

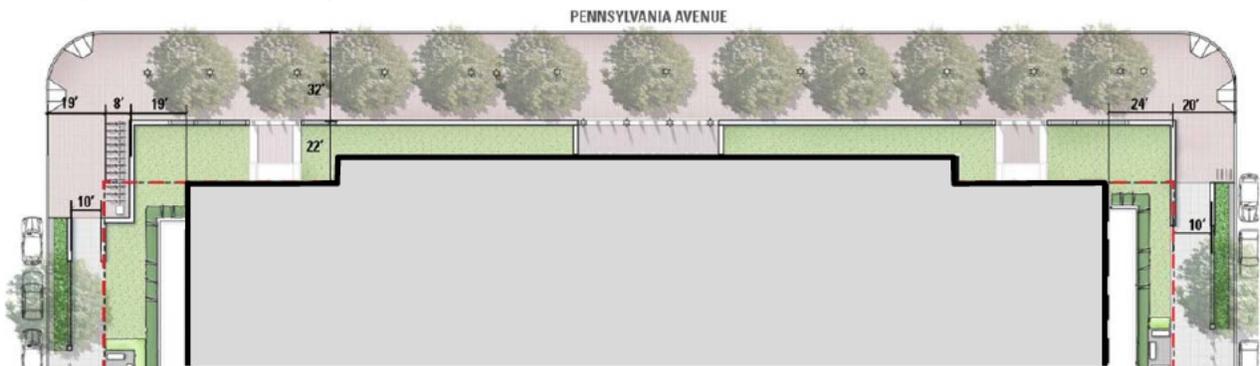


Figure 6: White House Visitor's Center Entrance, Pennsylvania Avenue – Site Plan

A Capital Bikeshare station is proposed for the 15th Street, NW and Pennsylvania Avenue corner of the building yard as GSA states it is a heavily used tourist route. The opposite corner of the building yard, at 14th Street, NW and Pennsylvania Avenue, NW, does not include a Capital Bikeshare station as a station is just across the street in front of the Ronald Reagan Building.

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 the building yard or in public space. This is permitted in the Urban Design and Security Plan policies as the building yard is less than 20 feet. The security elements will be located approximately 30 feet 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 removed 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.

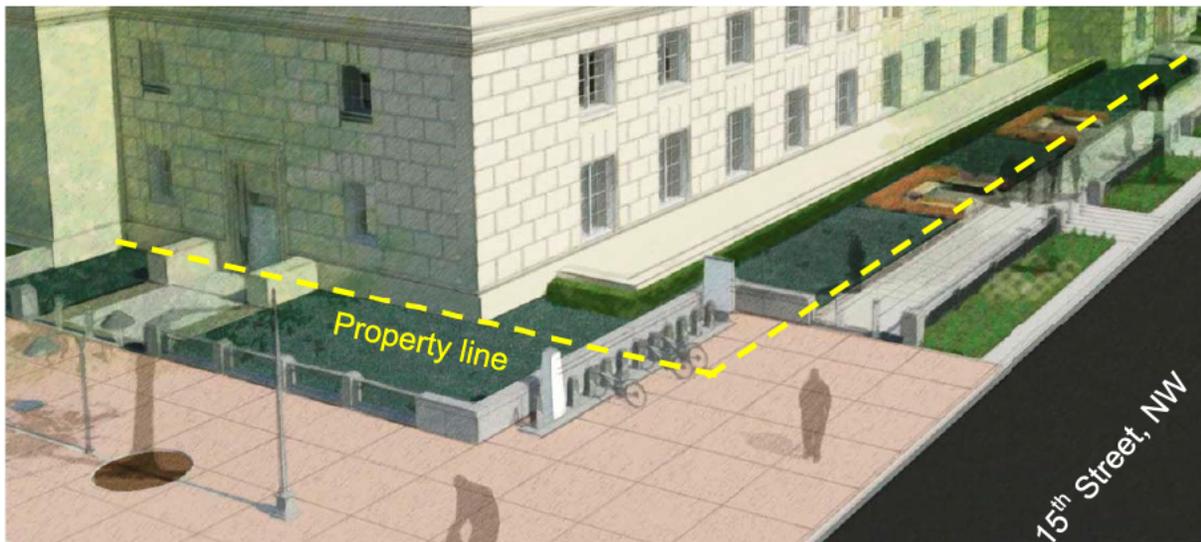


Figure 7: Transition from Pennsylvania Avenue to 15th Street, NW –Bird's eye view

Main Entrance – 14th Street, NW

Along 14th Street, NW, GSA is proposing a cable-rail system for a portion of the perimeter security, and a low perimeter wall as well. At the main employee entrance along the street, the low perimeter wall will be transitioned to bollards. The bollards will be used as the perimeter security for the main entrance. It should be noted that the Commission approved ramps, providing Americans with Disabilities Act (ADA) access to the Hoover Building, will be relocated as part of this project. The new ramps will be also allow access to the main entrance to this building.



Figure 8: Main Pedestrian Entrance - Site Plan



Figure 9: Main Pedestrian Entrance - 14th Street Section

National Aquarium Entrance – Constitution Avenue

At its July 2010 meeting, the Commission approved comments on the design of new entrance for the National Aquarium. The National Aquarium will be relocated within the Hoover Building from its current location on the north side to the basement level on the south side. The alignment of the perimeter security will be nearly identical to the alignment that the Commission commented favorably on in April 2013. The only change will be at the corner of Constitution Avenue and 14th and 15th Streets, NW where the revised concept has the perimeter security meet at a right angle. In the previous concept, a curved wall was placed at both corners.



Figure 10: Constitution Avenue and 14th Street, NW – Bird's eye view

The main entrance to the National Aquarium will be along Constitution Avenue. In July, 2010, the Commission provided comments to GSA on the concept design of this 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.

As part of this current proposal, 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, however, and will be submitted separately for Commission review in the future. The revised concept design for perimeter security incorporates security elements along the southern wall of the entrance pavilion, in public space. Staff suggested that the north wall of the entrance pavilion could incorporate security elements instead of the south wall as is currently designed.

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

GSA identified the need for permanent perimeter security measures for the Federal Triangle precinct. It has submitted a revised design for the Hoover Building perimeter security that includes changes in the alignment of the perimeter security along both 14th and 15th Street, NW. These changes it states have several objectives, namely:

“...provide(s) a scheme that both meets the security requirements identified by the ISC and the Department of Commerce, complements the style and scale of the building and site, and introduces improvements to the public realm.”

In order to accomplish these objectives, GSA states it is preferable to realign the perimeter security by alternating it from one side to of the sidewalk to the other along both 14th and 15th Streets. This would also mean that a portion of the perimeter security would be located in public space while other aspects of the perimeter security would be located at the property line. As the location of perimeter security is addressed in several NCPC documents, the Executive Director recommends that the Commission **note the Commission policy stating that “for existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet” and note that the proposed perimeter security elements that are in public space along 14th Street and 15th Street, NW are not consistent with this policy.**

Analysis

Staff analyzed this proposal, which includes perimeter security and site improvements at the Hoover Building, by reviewing it for consistency with the relevant policies contained in the *National Capital Urban Design and Perimeter Security Guidelines* and the *Comprehensive Plan for the National Capital*. Staff also reviewed the proposal's consistency with the strategies contained within the *Monumental Core Framework Plan*.

This revised proposal includes numerous perimeter security elements located in public space that are inconsistent with the NCPC policy while the previous concept. This is main difference between the April 2012 concept design, which received favorable comment, and this revised proposal.

GSA notes that special conditions concerning the location of the Hoover Building is an important factor in justifying the need to move the perimeter security into public space. These factors include the future increase in pedestrian traffic due to several nearby and on-site destinations opening and the extensive length of the 14th Street and 15th Street. At 1,165 feet, these two streets are among the longest unbroken blocks in the city. GSA also noted that the long blocks caused the April 2012 design to be monotonous and not include many pedestrian amenities. This revised design is GSA's attempt to address these.

Perimeter Security

Staff's review of the perimeter security elements for the revised concept design focused on the NCPC policies governing perimeter security and the Comprehensive Plan. While some of the

revised concept design perimeter security elements for the Hoover Building conform to the *Urban Design and Security Plan* and *Comprehensive Plan* policies, other elements are not in conformance, particularly the following policy regarding barrier placement:

- For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet. If the distance from the face of the building to the outside edge of the building yard is less than 20 feet, then the perimeter security barriers may be permitted in public space adjacent to that building.

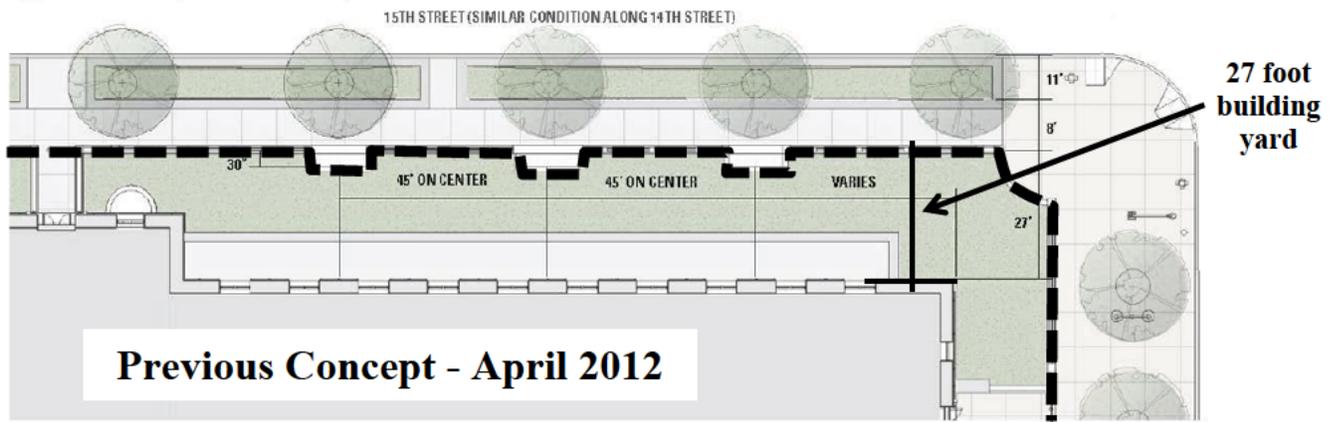


Figure 11: Concept Site Plan Detail (April 2012) – 15th Street, NW

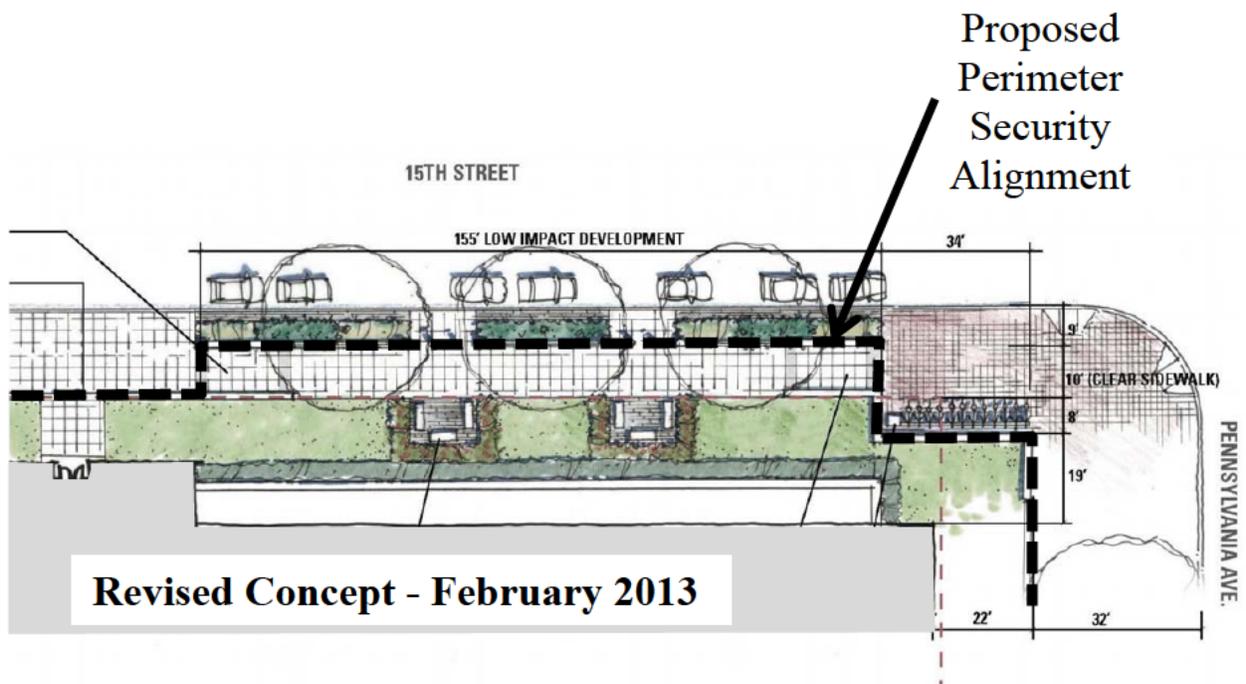


Figure 12: Revised Concept Site Plan Detail - 15th Street, NW

As noted earlier, the areas where the perimeter security will be located in public space are along the northern and southern ends of the sidewalks for both 14th and 15th Streets, NW. The building

yard extends at least 24 feet from the Hoover Building - 27 feet along 15th Street and 24 feet along 14th Street. Under NCPC policy, this requires the security elements to be located at or within the building yard. Figure 11 illustrates the previous concept design from April 2012. The other two images, Figures 12 and 13, are site plan details showing the new alignment of the perimeter security along 14th and 15th Streets, NW.

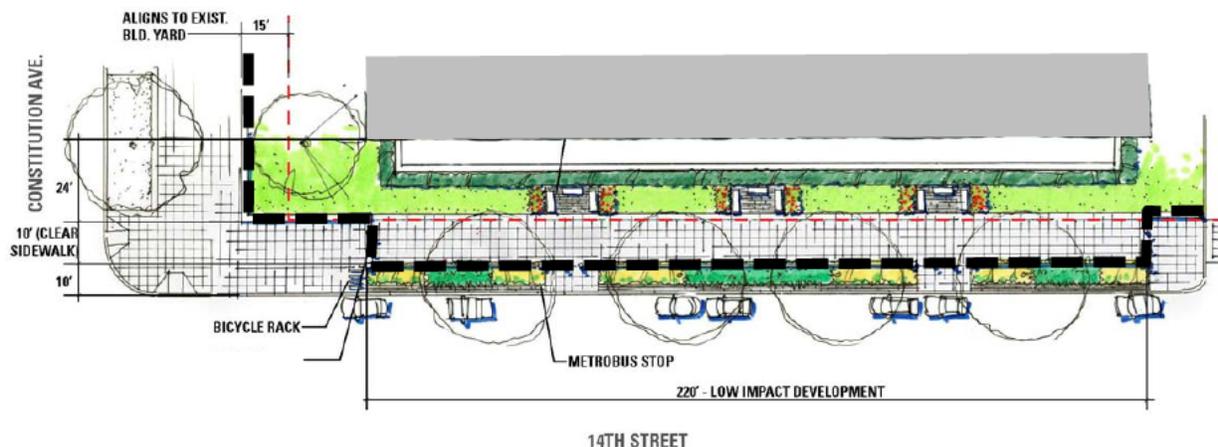


Figure 13: Revised Concept Site Plan Detail - Corner of 14th Street, NW and Constitution Avenue

Also, along Constitution Avenue, the established planting areas on either side of the existing pedestrian entrances to the Hoover Building will be extended into public space, in the south wall, as part of the National Aquarium Entrance Pavilion project. 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. Allowing the perimeter security element to be located in the back wall, or north wall, of the entrance pavilion would ensure that this project is in conformance with the policy.

This proposal is not compliant with another NCPC policy stating that perimeter security elements in public space should be discouraged and minimized. GSA's revised concept design indicates that approximately 750 linear feet, or 34 percent, of the proposed perimeter security along 14th Street and 15th Street will be in public space. As these security barriers are located in public space, NCPC policy states that they should be integrated into the landscape and their visual and physical impact should be minimized. Staff would recommend that GSA coordinate with District of Columbia Department of Transportation and others to minimize the impact of these on public space.

Finally, the policy to not allow perimeter security to cross pedestrian circulation is an important one as both 14th and 15th Streets are pedestrian routes that connect Pennsylvania Avenue to the National Mall, south of the site. While this proposal is in conformance to this policy, GSA's concept design currently includes collapsible sidewalks as a perimeter security measure. These measures allow for the perimeter security to span the sidewalk without having to use bollards, which can be an obstacle for pedestrians. Staff is generally supportive of this technology,

however questions remain as to the viability of it at this location given the expected high pedestrian use and the potential for maintenance vehicles to accidentally damage it.

Site Improvements

Along with the realignment of some of the perimeter security elements, GSA's revised concept design includes several site improvements including low impact development areas, new and replacement paved areas, new tree strips and trees, two Capital Bikeshare Stations, seating areas with benches, and two raised planted areas flanking the main employee entrance along 14th Street, NW. Any improvements will need to satisfy the conditions necessary to obtain the approval of the District of Columbia's Public Space Committee.

Staff finds that the Comprehensive Plan policies and Monumental Core Framework Plan strategies include guidance on the site improvements. GSA's inclusion of low impact development areas to mitigate stormwater runoff is well supported by the Commission policies and would be an improvement to the current condition along both 14th Street, NW and 15th Street, NW. The LIDs in the tree strip areas would only occur at the locations where the perimeter security is being proposed next to it. Information on LIDs should be provided describing what their impact will be on stormwater at this location.

The Monumental Core Framework Plan also includes guidance about using consistent streetscape elements in the Federal Triangle paying particular attention to the design guidelines for Pennsylvania Avenue, the Mall Streetscape Plan and the District of Columbia Design Guidelines. In addition, the improvement of the pedestrian experience along Pennsylvania Avenue and in the Federal Triangle is also discussed in this plan. These improvements could include the provision of seating and shade, plantings of seasonal interest and enhancing perceived safety by adding pedestrian friendly lighting and protection from traffic.

The Comprehensive Plan polices encourage the replacement of dead street trees and where they have been removed due to development. GSA notes in the submittal information that the trees along 14th and 15th Street are not healthy and their canopies are compromised which would necessitate their replacement. Staff is supportive of tree removal where necessary and would suggest that GSA develop a plan describing tree replacement and relocation.

Regarding the integration of Capital Bikeshare Stations into the revised concept design, NCPC policies strongly endorse the use of alternative transportation modes for federal employees. Staff is supportive of this improvement as it can encourage federal employees to use alternative means of commuting to work. In addition, since there are many visitors already using 15th Street and more expected to this area, the inclusion of these two stations would definitely be a benefit to the public. As a number of bike sharing stations have already been installed on and off federal property, staff would note that GSA should continue to coordinate with Capital Bikeshare to determine the best location for the new stations.

While staff noted earlier that segments of the perimeter security are not in compliance with the one of our policies, **note that the unique site conditions - a significant increase in pedestrian traffic from three tourist destinations opening in close proximity to this site and both 14th**

and 15th Streets, NW being nearly 1,200-foot-long blocks - may justify an exception in this case, and therefore:

- **Agrees to consider a partial exception to this policy for the perimeter security elements located in public space, on the condition that the applicant is able to demonstrate, in future submissions, that the public benefits provided outweigh the impact of the security elements in public space by:**
 - **Complying with policies stating that where security barriers in public space cannot be avoided they should be integrated into the urban landscape in a manner that minimizes their visual impact and physical infringement into public space**
 - **Supporting the recommendations of the Monumental Core Framework plan by improving the pedestrian experience along Pennsylvania Avenue and in the Federal Triangle through the provision of seating and shade and plantings that provide seasonal interest, and by enhancing perceived safety through the provision of pedestrian-oriented lighting and protection from vehicular traffic**
 - **Further supporting the recommendations of the Monumental Core Framework plan by introducing sustainable public spaces through the use of low impact design to capture and mitigate storm water runoff**
 - **Providing a pedestrian environment that is free from obstruction by eliminating bollards that cross the pedestrian path**
 - **Ensuring that pavement materials and streetscape elements are consistent, as appropriate, with the design guidelines for Pennsylvania Avenue, the Mall Streetscape Plan, and the District of Columbia Streetscape Design Guidelines**
 - **Coordinating elements in public space with the District of Columbia's Department of Transportation**

Comprehensive Plan for the National Capital

The project conforms to some of the policies in the Federal Elements of the Comprehensive Plan for the National Capital, 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 renovation and modernization of the Hoover Building will provide additional high-quality federal office space within the monumental core. The revised design would improve the current streetscape conditions, by providing workers in the building and the surrounding area comfortable places to enjoy with seating, new trees and new landscaping. In addition, the inclusion of LIDs is a benefit as it will provide areas to treat some of the stormwater falling on the site.

While GSA states the redesign was developed in order to improve the pedestrian experience, staff is not convinced that the revised design accomplishes this goal as pedestrians will be walking into and out of secured areas along 14th and 15th Streets, NW. As was mentioned earlier in the staff analysis, the proposed perimeter security is not consistent with the Federal Workplace

polices pertaining to the design and location of physical building security as some of it is located in public space.

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 (3rd to 15th Streets, NW) Perimeter Security and Streetscape Improvements
- The Constitution Avenue (3rd to 15th and 17th to 23rd Streets, NW) Perimeter Security and Streetscape Improvements

This project was not included in the FCIP for FY 2012-2017, the most recent program approved by the Commission.

National Capital Urban Design and Security Plan Objectives and Policies

Only some of the elements in the revised concept design are consistent with the National Capital Urban Design and Security Plan (UDSP) 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 Hoover Building, namely:

- 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.”

While some of the revised concept design perimeter security elements for the Hoover Building conform to the UDSP, other elements are not in conformance with it, particularly the following policies regarding barrier placement and design:

- For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet. If the distance from the face of the building to the outside edge of the building yard is less than 20 feet, then the perimeter security barriers may be permitted in public space adjacent to that building.
- The placement of security barriers in public space is discouraged and should be minimized.

In addition, while the UDSP policy on not allowing barriers to cross sidewalks perpendicularly is being followed, as noted in the staff analysis section, staff has questions about the viability of the collapsible sidewalk being included along 14th and 15th Streets, NW.

Consistent with policies

Approximately two-thirds of the perimeter security included in the revised design is consistent with the policies in the UDSP. For example, along Pennsylvania Avenue at the WHVC main entrance, the building façade is either at the property line or over it - a portion of the building is actually located in public space. GSA is proposing that the secure perimeter be located in public space. However, as the building yard is less than 20 feet, and the existing building yard line will be maintained this portion of the project is consistent with the UDSP policies.

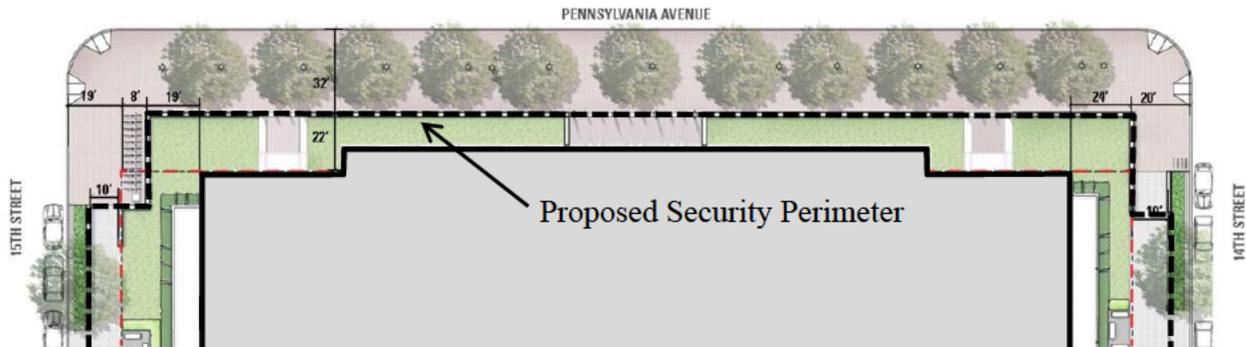


Figure 14: White House Visitor's Center Entrance, Pennsylvania Avenue – Site Plan

Monumental Core Framework Plan

Staff finds that the proposed concept for perimeter building security partially 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 will help to provide a pleasing barrier free transition between downtown, the Federal Triangle, and the monumental core.

The Framework Plan notes for following for the Federal Triangle:

As the country's most important symbolic and ceremonial avenue and the center of the nation's governance, this area should reflect the beauty of the nation's capital and exemplify stability, vitality, accessibility and stewardship. With its handsome buildings and marvelous civic art, the public realm has enormous potential as on the of Washington's premier destinations.

It is important therefore for the design of the perimeter security at the Hoover Building to be well-integrated and responsive to its context.

National Environmental Policy Act (NEPA)

In December, 2010, in response to an earlier concept design that featured an extensive line of bollards along the curb in public space, the Executive Director sent a letter to GSA stating that that such a design could constitute a significant impact which would require an environmental

impact statement. The adverse impacts of the concept currently being proposed appear to be much less significant, and an environmental impact statement therefore may not be required. NCPC and GSA staff will work together to determine the appropriate level of environmental review and to complete that review before the project is submitted for preliminary and final review.

National Historic Preservation Act (NHPA)

When the Hoover Building was constructed between 1926 and 1932, it was 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.

The Federal Triangle, a central component of the McMillan Plan, is part of the Pennsylvania Avenue National Historic Site which is listed in the National Register of Historic Places. In addition, the Federal Triangle is eligible for the National Register of Historic Places as a historic district. The Federal Triangle primarily consists of monumental public buildings that reflect the architectural and planning significance of the federal government in the Nation's Capital.

GSA has begun informal consultation under Section 106 of the National Historic Preservation Act with the District of Columbia State Historic Preservation Office on this project.

III. CONSULTATION

Coordinating Committee

The Committee reviewed the proposal at its January 16, 2013 meeting, and forwarded the proposed concept design to the Commission with the statement that the proposal has been coordinated with all participating agencies. While the District of Columbia Office of Planning coordinated on this project, it did provide a few comments: the proposed changes would likely result in an "adverse effect" determination under Section 106; there was a need for additional information on the LIDs; and they supported replacing the bollards in the sidewalk with collapsible concrete. 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 submitted a previous concept level design to the Commission of Fine Arts (CFA) for review at its April 2012 meeting. CFA was generally supportive of the design and delegated the final design submission to its staff. The revised concept design has not been reviewed by CFA.