

**FEDERAL OFFICE BUILDING 8  
SITE IMPROVEMENTS AND PERIMETER SECURITY**

200 C Street, SW  
Washington, DC

Finding of No Significant Impact

**FEB 25 2010**

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 building plans for site improvements and perimeter security at Federal Office Building 8 (FOB 8), located at 200 C Street, SW in Washington DC, as shown on NCPC Map File No. 1.72(38.00)42958, the December 2009 Environmental Assessment (EA) prepared by the General Services Administration (GSA), and the comments received by GSA, and have determined that the proposal will not have a significant impact on the human environment.

Proposed Action

The EA analyzes three alternatives and a no action alternative. The proposed action, Alternative "B" in the EA, calls for site improvements and perimeter security at FOB 8 including the replacement of a surface parking lot with a landscaped plaza, and adds extensive landscaping along all four sides of the building. The proposed perimeter security design largely eliminates the need for perimeter security elements in public space and therefore the design successfully mitigates any potentially significant direct or cumulative impacts. Along C and 3<sup>rd</sup> Streets, where the building yard is greater than 20 feet, the security elements have been located inside the sidewalk. Only along 2<sup>nd</sup> and D Streets, where the building yard ranges between zero and five feet, have security elements been located along the curb. The proposed 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.

The key element of the site improvements is a new landscaped plaza along C Street. The plaza will replace an existing surface parking lot and serve as a welcoming entry forecourt to FOB 8. The conversion of on-site parking to pedestrian-oriented uses also helps to mitigate otherwise potentially significant impacts of the project as a whole. Along the south side of the plaza, seatwall planters will extend the length of the building façade on either side of the entrance. Along the north side of the plaza, sculptural lawn mounds with ornamental trees will provide a softer edge to the plaza. Paving for the plaza

will consist of exposed aggregate concrete, consistent with what will be used throughout the surrounding public space.

Perimeter security around the three sides of the plaza is provided primarily within the building yard. Along C Street, security elements will include a hardened outside parapet wall of the existing garage ramp, located within public space, and a series of garden walls separated by narrow pedestrian pathways. The garden walls will be composed of precast concrete with a limestone veneer, and a powder-coated steel top railing. Five bollards will cross the main pedestrian path leading to the building entrance. Both the garden walls and the bollards will be located within the building yard.

Security along the 3<sup>rd</sup> Street side of the plaza is partially provided by a large, oval planter that has been hardened and designed to match the garden walls along C Street. The remainder of the security line along this side of the plaza is composed of two bollards on either side of the oval planter, and a seatwall planter that wraps around the northwest corner of the building. Security along the east side of the plaza is provided by four retractable bollards across the garage entrance, and four additional bollards that transition to the curbside security elements along 2<sup>nd</sup> Street. In addition, a new guard booth is proposed at the northeast corner of the project site next to the garage ramp.

The perimeter security along 3<sup>rd</sup> Street has been successfully integrated into the proposed site improvements of the building yard. The seatwall planter that wraps around the northwest corner of the building will become a hardened garden wall backfilled with a variety of shrubs, perennials, and groundcovers. Further south along this side of the building, the existing parapet wall and guardrail of the sunken courtyard will be reconstructed and hardened. Similar to C Street, the 3<sup>rd</sup> Street security elements are located within the building yard and have been designed to relate to the architecture of the building.

Due to the complete lack of a building yard on the south and east sides of the building, the perimeter security along 2<sup>nd</sup> and D Streets is proposed to be located along the curb with a minimal number of security elements crossing the sidewalk. On 2<sup>nd</sup> Street, the width of the building yard measures zero feet for the entire length of FOB 8. Along the entire D Street façade, the width of the building yard measures 5'4". Generally, the security elements will be set back two feet from the edge of the curb except for where existing Metrorail ventilation shafts require the elements to be set back approximately six feet from the curb. The security elements along 2<sup>nd</sup> and D Streets consist of a variety of hardened streetscape furnishings such as benches, bike racks, bollards, streetlights, garden walls, newspaper boxes, and trash receptacles. Since these elements are located within public space they have been designed to relate to the surrounding urban context and will be of a consistent dark color to help blend in with the extensive landscaping proposed.

### 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 because otherwise potentially significant direct and cumulative impacts have been mitigated through the project design in a manner that is appropriate to this specific context. 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 17 environmental impact topic areas. These topic areas are generally categorized as: cultural, socioeconomic, and natural resources; transportation; utilities and infrastructure; air quality; and noise. Following the necessary procedures for analysis, public comment, and response to public comments received, GSA selected “Alternative B” and issued a Finding of No Significant Impact (FONSI) for this alternative on December 11, 2009. Of the 17 environmental topic areas analyzed, NCPC’s review of the EA for this project focused in particular on the potential impacts to public space, pedestrian circulation, and historic and visual resources.

Minor to moderate impacts to public space and pedestrian circulation will occur as a result of the proposed action, primarily due to the location of bollards at the corner of 2<sup>nd</sup> and D Streets, and at the east entrance to the landscaped plaza. To mitigate these impacts the proposed perimeter security 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. At the locations where the perimeter security line transitions from the building yard to the curb, thereby crossing the sidewalk, adequate clearance between security elements will be provided to maintain pedestrian flow and ensure ADA compliance.

## *Section 106*

Potential impacts and adverse effects on historic and visual resources were considered in the EA and through the Section 106 process of the National Historic Preservation Act (NHPA). GSA and the District of Columbia State Historic Preservation Office (DC SHPO) have determined that the proposed action will have an adverse effect on the L'Enfant Plan, particularly along 2<sup>nd</sup> and D Streets where the perimeter security will be located in public space. 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, the location of the security elements in the building yard along 3<sup>rd</sup> and C Streets will help minimize adverse effects on these two contributing L'Enfant streets.

In addition, the MOA stipulates that in order to minimize and mitigate the adverse effect along 2<sup>nd</sup> and D Streets perimeter security elements shall consist of a variety of hardened elements including benches, bollards, bike ramps, and lamp posts, and GSA will undertake an extensive re-vegetation program for the building yard and the adjacent public spaces fronting the surrounding streets. These measures have been incorporated into the proposed design.

### *Cumulative Impacts*

While the historic and visual cumulative impacts of permanent perimeter security of FOB 8 may be considered moderate given the context of the immediate surroundings, such impacts might be considered significant for another project in another location. Also, the EA acknowledges the proliferation of perimeter security in the nation's capital and directly references several projects that are planned, have been approved, or have recently been completed. As shown in Figure 4-1 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 likelihood of future projects having significant cumulative impacts is growing.



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