FEDERAL OFFICE BUILDING 8
EXTERIOR IMPROVEMENTS

DRAFT ENVIRONMENTAL ASSESSMENT

WASHINGTON, DC

U.S. GENERAL SERVICES ADMINISTRATION

IN COOPERATION WITH THE NATIONAL CAPITAL PLANNING COMMISSION

AUGUST 2009

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DRAFT
ENVIRONMENTAL ASSESSMENT

Responsible Agency:
General Services Administration

Cooperating Agency:
National Capital Planning Commission

Abstract:
The General Services Administration (GSA), in cooperation with National Capital Planning Commission, has prepared this Environmental Assessment (EA) for exterior improvements to Federal Office Building 8 (FOB 8) in Washington, DC. The project includes the renovation of the exterior of the building and its grounds, the addition of an entrance pavilion, and the installation of permanent perimeter security. This EA considers the environmental effects of implementing the No Action (no build) alternative and three action alternatives. The action alternatives differ in the location of perimeter security and the design of a landscaped plaza on the north elevation of the building.

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TABLE OF CONTENTS

1.0 Purpose and Need
- 1.1 Introduction 1-1
- 1.2 Background 1-3
- 1.3 Purpose and Need for the Proposed Action 1-5
- 1.4 Public Involvement and Agency Coordination 1-6
- 1.5 Environmental Issues Considered 1-7

2.0 Alternatives
- 2.1 Introduction 2-1
- 2.2 Alternatives Considered But Dismissed From Detailed Analysis 2-1
- 2.3 Alternative A: Preferred Alternative 2-3
- 2.4 Alternative B 2-9
- 2.5 Alternative C 2-12
- 2.6 No Action Alternative 2-14
- 2.7 Comparison of Alternatives 2-14
- 2.8 Selection of Preferred Alternative 2-18

3.0 Affected Environment
- 3.1 Cultural Resources 3-1
  - 3.1.1 Archaeological Resources 3-3
  - 3.1.2 Historic Resources 3-4
  - 3.1.3 Visual Resources 3-22
- 3.2 Socio-Economic Resources 3-36
  - 3.2.1 Land Use 3-36
  - 3.2.2 Planning Policies 3-37
  - 3.2.3 Public Space 3-42
- 3.3 Natural Resources 3-43
  - 3.3.1 Vegetation 3-43
  - 3.3.2 Water Resources 3-45
- 3.4 Transportation 3-46
  - 3.4.1 Vehicular Circulation 3-46

3.4.2 Parking 3-47
3.4.3 Public Transportation 3-48
3.4.4 Pedestrian/Bicycle Circulation 3-49
3.5 Utilities/Infrastructure 3-51
3.5.1 Utilities 3-51
3.5.2 Stormwater Management 3-52
3.5.3 Hazardous Waste/Contamination 3-53
3.6 Air Quality 3-54
3.7 Noise Levels 3-55

4.0 Environmental Consequences
4.1 Cultural Resources 4-1
4.1.1 Archaeological Resources 4-2
4.1.2 Historic Resources 4-4
4.1.3 Visual Resources 4-8
4.2 Socio-Economic Resources 4-17
4.2.1 Land Use 4-17
4.2.2 Planning Policies 4-17
4.2.3 Public Space 4-20
4.3 Natural Resources 4-23
4.3.1 Vegetation 4-23
4.3.2 Water Resources 4-23
4.4 Transportation 4-25
4.4.1 Vehicular Circulation 4-25
4.4.2 Parking 4-26
4.4.3 Public Transportation 4-26
4.4.4 Pedestrian/Bicycle Circulation 4-27
4.5 Utilities/Infrastructure 4-30
4.5.1 Utilities 4-30
4.5.2 Stormwater Management 4-33
4.5.3 Hazardous Waste/Contamination 4-34
4.6 Air Quality 4-35
4.7 Noise Levels 4-36

4.8 Cumulative Impacts 4-37

5.0 Appendix
5.1 Sources
5.2 Preparers
5.3 Notification List

FIGURES

Figure 1-1 FOB 8 Project Site and Surrounding Area 1-2

Figure 1-2 FOB 8 as viewed from the north side of C Street, SW 1-4

Figure 2-1 Entry Pavilion Reduction 2-2

Figure 2-2 Proposed Exterior Improvements to FOB 8 2-3

Figure 2-3 Typical Streetscape Condition 2-5

Figure 2-4 Typical Plaza Condition 2-6

Figure 2-5 Alternative A Site Plan 2-8

Figure 2-6 Alternative B Site Plan 2-11

Figure 2-7 Alternative C Site Plan 2-13

Figure 3-1 Area of Potential Effects for Historic Resources 3-2

Figure 3-2 L'Enfant Plan for the City of Washington, 1791 3-5

Figure 3-3 The Mall 3-7

Figure 3-4 View south on 3rd Street from Jefferson Drive 3-8

Figure 3-5	U.S. Capitol Building	3-10
Figure 3-6	View to U.S. Capitol from the northeast corner of the project site	3-11
Figure 3-7	Hubert H. Humphrey Building	3-12
Figure 3-8	View of Hubert H. Humphrey Building from FOB 8	3-13
Figure 3-9	Mary Switzer Building	3-15
Figure 3-10	Wilbur J. Cohen Building	3-17
Figure 3-11	U.S. Botanic Garden	3-18
Figure 3-12	View of U.S. Botanic Garden from FOB 8	3-19
Figure 3-13	The Bartholdi Fountain	3-21
Figure 3-14	View east on C Street from 3rd Street, SW	3-24
Figure 3-15	View west on C Street with FOB 8 and the Switzer Building in the foreground	3-25
Figure 3-16	View along the Diagonal Portion of C Street from the northeast corner of the project site	3-26
Figure 3-17	View looking north along 3rd Street from D Street, SW	3-28
Figure 3-18	View looking north on 3rd street near C Street, SW	3-29
Figure 3-19	View looking east on D Street, SW with FOB 8 on the left	3-31
Figure 3-20	View along D Street, SW looking west with FOB 8 on the right	3-32
Figure 3-21	View south on 2nd Street from C Street, with FOB 8 on the right	3-34

Figure 3-22 View north on 2nd Street, SW with the Humphrey Building on the left, and the National Mall and U.S. Botanic Garden in the Center of the View 3-35

Figure 3-23 Magnolia at the corner of C and 3rd Streets, SW 3-44

Figure 3-24 Narrow sidewalk at the east end of C Street, SW with FOB 8 at the left 3-50

Figure 4-1 District-wide Perimeter Security Projects 4-40

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1.0

PURPOSE AND NEED

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1.0 PURPOSE AND NEED

1.1 INTRODUCTION

Federal Office Building 8 (FOB 8) was constructed as a laboratory facility for the U.S. Food and Drug Administration (FDA) in 1965 and was occupied by FDA until 2002. The building is located approximately two blocks southeast of the U.S. Capitol Building, filling an entire city block in Southwest Washington, DC. The block is bounded by C Street, SW in the north, 2nd Street, SW in the east, D Street, SW in the south, and 3rd Street, SW in the west (Figure 1-1). In conjunction with a major modernization of the building that will convert laboratory to office space, the U.S. General Services Administration (GSA) proposes to install permanent perimeter security at the building, add an entrance pavilion, and renovate the exterior of the building and its grounds.

GSA is preparing this Environmental Assessment (EA) to determine the potential impacts of the exterior improvements to the building and site work on the natural and man-made environment. The National Capital Planning Commission (NCPC) is a cooperating agency in this effort. This EA is consistent with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], the National Historic Preservation Act (NHPA) of 1966, as amended, and GSA's PBS *NEPA Desk Guide*.

This EA identifies three action alternatives and a No Action alternative. Potential environmental impacts are outlined for each of the alternatives, including short-term construction-related impacts, long-term operational impacts, and cumulative impacts resulting from the implementation of the proposed action together with other current or planned projects. In addition, mitigation measures are suggested to address identified impacts. The study area for the assessment of impacts is generally within a one-block radius of the site, however, this area may expand or contract based on the resource discipline.

Figure 1-1: Project Site and the Surrounding Area
Source: EDAW

1.2 BACKGROUND

Located at 200 C Street, SW, FOB 8 was designed and constructed in 1965 for FDA as laboratory space. Additional tenants have included the Consumer Product Safety Commission and a division of EPA. FDA vacated the building in 2002 and interior renovation began, including the abatement of hazardous materials. The renovation will convert vacant, former laboratory, space to office space suitable for use by federal agencies. There is currently a market for federal office space, particularly in the vicinity of the U.S. Capitol Building, and the renovation of FOB 8 will provide additional space to satisfy the demand. Once the renovation is complete, the Architect of the Capitol (AOC) and U.S. Department of Health and Human Services will be lease holders for the spaces within FOB 8. The space being leased by AOC will be occupied by the U.S. House of Representatives. Abatement of hazardous materials has been completed and minor interior renovations have begun. Prior to any work on the building, compliance with NEPA was achieved through the completion of a categorical exclusion. At the time the categorical exclusion was completed the scope of the project did not include the installation of permanent perimeter security, an entrance pavilion, and the conversion of the existing surface parking lot to landscape plaza. Due to the change in the scope of the project, and inclusion of perimeter security elements that may be located in public space, an EA was deemed necessary to understand the impacts that the proposed exterior improvements and enhanced site work could have on the human environment.

The building is comprised of eight levels: a basement, a ground level, and six additional stories (Figure 1-2). There is also a rooftop penthouse containing mechanical equipment. The basement level contains an underground parking garage that accommodates 59 cars and is accessed from a driveway off of 2nd Street. The garage is located outside of the main building footprint, below a surface parking lot on the north face of the building.

Figure 1-2: FOB 8 as viewed from the north side of C Street
Source: EDAW, 2008

1.3 PURPOSE AND NEED FOR THE PROPOSED ACTION

The purpose of and need for the proposed action is to enhance the building and building site and provide Level IV protection for the facility. The proposed action includes improvements to the façade of FOB 8 and adjacent grounds, the installation of permanent perimeter security measures, the conversion of a surface parking lot to a landscaped plaza, and the construction of a new entrance pavilion for the building.

The proposed permanent security measures were developed in accordance with the Interagency Security Committee (ISC) Security Design Criteria for New Federal Office Buildings and Major Modernization Projects approved by concurrence of the ISC membership on September 29, 2004. The ISC Security Design Criteria require that security measures be based on a building-specific risk assessment resulting in a recommended Level of Protection. The level of protection is determined by tenant function missions, adjacent facilities and targets, significance of the facility, and building size and location. The only "risk assessment" that was performed on FOB 8 was completed in 2003 when the facility was vacant. The Facility Security Level Determinations for Federal Facilities (ISC Standard) that was conducted by the tenant agencies, Federal Protective Service (FPS), and GSA determined that the facility was a Level IV facility. The subsequent Decision Support Tool (ISC Standard) determination indicates a High Level of Protection for perimeter security, defended standoff, and blast resistant tables. Designation as a Level IV facility implies that the building will house at least 450 federal employees and is likely to be: over 150,000 sf; have a high-volume of public contact; and house tenant agencies that could include high-risk law enforcement and intelligence agencies, courts, judicial offices, and highly sensitive government records. The proposed permanent perimeter security measures were developed to provide the level of protection that is required by the risk assessment. The three action alternatives were designed to reduce vulnerability from identified threats.

The proposed façade improvements have been designed to maximize the amount of natural light into the building interior, while at the same time providing blast resistant exterior walls and windows. These façade improvements are needed in order to create high quality office space that meets the level of protection deemed necessary for the building and proposed federal tenants. The conversion of the surface parking lot to a landscaped plaza would provide public gathering space for occupants of the surrounding federal buildings.

1.4 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

1.4.1 Public Involvement and Agency Coordination

GSA initiated the public scoping process on February 11, 2009 through the distribution of letters to regulatory and review agencies requesting comment on the proposed exterior improvements to FOB 8. In addition, an announcement was posted on the GSA website stating the agency's intention to prepare an EA and to solicit public comment during the scoping period. The public comment period was open through March 13, 2009. Comments received during this period were taken into consideration in the development of this EA.

As part of the coordinated Section 106 and NEPA process, consultation meetings have taken place. The first meeting occurred on April 7, 2009 and included NCPC, the Commission of Fine Arts (CFA), DC Office of Planning (DCOP), National Park Service (NPS), and other interested agencies. The second consultation meeting occurred on July 2, 2009. Meetings will continue, as necessary, throughout the environmental and historic preservation review process.

1.4.2 Public and Agency Comments on the EA

The public and agencies are encouraged to comment on the contents of this EA. The organizations, agencies, and individuals listed on the notification list in the Appendix were notified by mail or email of the availability of the EA. The FOB 8 EA has been posted on GSA's website and copies of the EA are available for review at: the offices of the National Capital Planning Commission at 401 Ninth Street, NW, North Tower, Suite 500, Washington, DC; Martin Luther King, Jr. Memorial Library, 901 G Street, NW, Washington, DC; Southwest Neighborhood Library, 900 Wesley Place, SW, Washington, DC; and Southeast Neighborhood Library, 403 7th Street, SE, Washington, DC

Comments on the EA must be submitted during the 30-day comment period, which concludes on September 25, 2009. Comments should be mailed, emailed or faxed to:

Ms. Suzanne Hill, GSA NCR NEPA Lead
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301 7th Street, SW
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1.5 ENVIRONMENTAL ISSUES CONSIDERED

This EA has been prepared to evaluate the potential impacts that the proposed building façade and site work renovation and security elements would have on a range of natural and man-made resources. These include:

- cultural resources (historic, archaeological, and visual resources);
- socioeconomic resources (land use, planning policies, and public space);
- natural resources (vegetation and water resources);
- transportation (vehicular circulation, parking, public transportation, and pedestrian circulation);
- utilities/infrastructure (utilities, stormwater management, and hazardous materials);
- air quality; and
- noise.

Through the scoping process, it was determined that cultural resources was a key topic of consideration and thus required a more detailed analysis.

Several issues were initially considered for evaluation in this EA, but were eliminated from detailed study because there would be no impacts or impacts would be negligible. These issues, and the rationale for their elimination, are as follows:

Economic and Fiscal Resources: Exterior improvements to FOB 8 would not increase or decrease economic activity in the area, nor would they impact local tax revenues. Thus, this resource area was dismissed from detailed study.

Community Facilities: The proposed action would not increase or decrease the population of the area, or change the current residents' access to community facilities. Thus, there would be no impacts to this resource area.

Demographics and Environmental Justice: Due to the project's location, the proposed action would not directly affect the resident populations. Thus, there would be no impacts to demographics or environmental justice.

Geology, Topography, and Soils: The exterior improvements to FOB 8 would not have any substantive impacts on the site's natural geology, topography or soils, as little excavation would be required and the soils in the area are generally the result of fill. Further, the site has been previously disturbed and exists within a dense urbanized area.

Wildlife: Wildlife on the FOB 8 site is limited to urban species, including grey squirrels, house sparrows, and pigeons. These species could be temporarily dispersed during construction. However, urban wildlife would be expected to return to the site once construction is completed.

2.0

ALTERNATIVES

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2.0 ALTERNATIVES

2.1 INTRODUCTION

This EA evaluates a range of alternative actions related to the proposed exterior improvements and permanent perimeter security elements for FOB 8. Four alternatives are considered within this EA, three action alternatives and a No Action alternative. The three action alternatives each present different concepts for the location of perimeter security and the design of the plaza on the north side of the building.

2.2 ALTERNATIVES CONSIDERED BUT DISMISSED FROM DETAILED ANALYSIS

Over the course of more than a year, GSA considered numerous designs for the landscaped plaza on the north face of the building. These concepts ranged from hardscaped plazas to open grassy lawns. The three alternatives considered within this EA were refined during the public scoping process and represent a range of potential design options.

GSA also considered several designs for the security pavilion on the building's north elevation. Alternatives not carried forward within the EA include a one-story pavilion with a reduced footprint, a larger pavilion than the one currently proposed, and the absence of a pavilion. The latter would require that security screening occur within the main body of the building. This option was rejected as it would not meet established security criteria for FOB 8. The one-story pavilion with a substantially smaller footprint was rejected due the fact that it would not allow sufficient screening space to accommodate the required program. The larger pavilion which was initially considered would have stood 44'-10" high, with a footprint of 43'-6" wide by 46'-3" deep. A smaller design was chosen as it would reduce visual impacts on adjacent properties and view corridors, in addition to creating additional public space within the plaza. Figure 2-1 illustrates the reduction in the size of the pavilion from that originally considered.

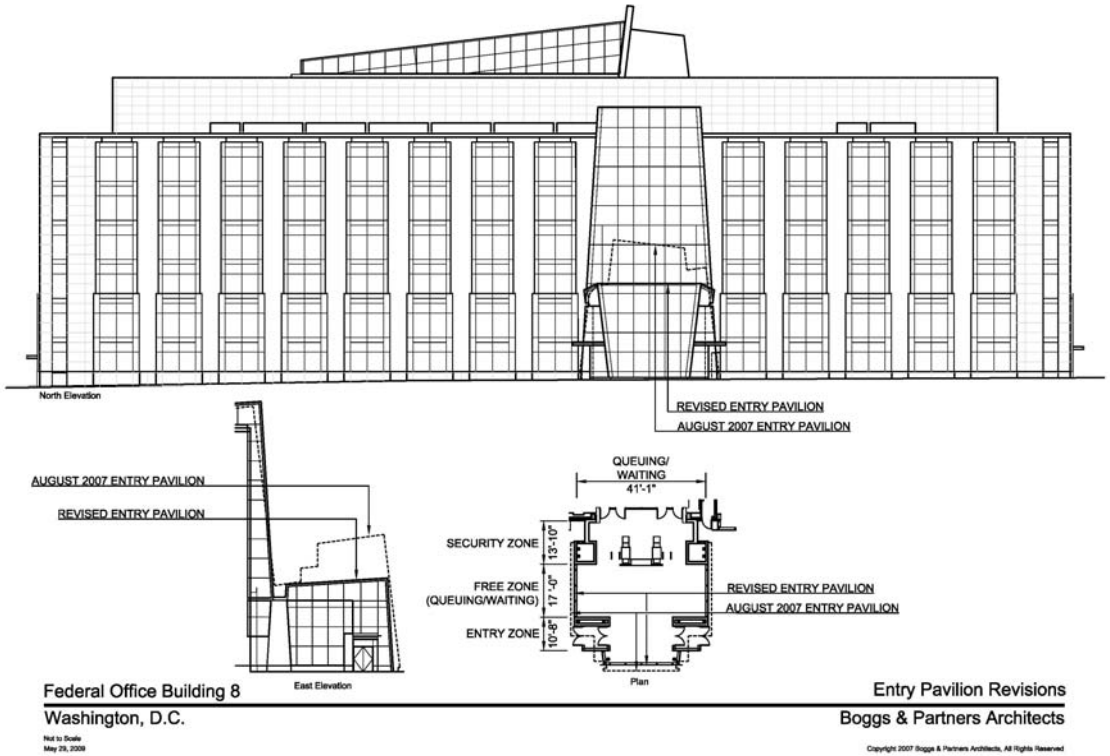

Figure 2-1: Entry Pavilion Reduction
Source: Boggs and Partners, Architects, 2009

GSA considered establishing the defended security perimeter at 50 feet from the façade of the building, as required by the established level of protection, along 2nd, 3rd, and D Streets. This alternative, however, was rejected as it would have required closing traffic lanes on these streets. Further hardening of the building to reduce the recommended standoff was considered but would have required substantial demolition and dramatically increased the cost of the renovation.

2.3 ALTERNATIVE A: PREFERRED ALTERNATIVE

Under Alternative A, exterior improvements would be made to FOB 8 as a part of the renovation of the building. FOB 8 was originally designed as laboratory space and thus glazing is limited, particularly on the 2nd and 3rd Street elevations. Under Alternative A, the vertical bands of windows on the C and D Street elevations would be maintained; however, where the individual windows are now segmented by panels, the renovated structure would have continuous bands of glazing. On the 2nd and 3rd Street elevations, the current glazed vertical bands would be replaced with 42'-8"-wide glazed panels, allowing natural light into the new offices. In addition, a skylight would project from the surface of the roof (Figure 2-2).

In addition to the new glazing, a security pavilion would be installed at the main entrance on the north face of the building. It would be 30'-9" high, with a footprint of 43'-6" wide by 46'-3" deep. The pavilion would be constructed of granite and glass, with the glazed walls serving to minimize its apparent mass and scale.

Figure 2-2: Proposed Exterior Improvements to FOB 8 along 2nd and C Streets
Source: Boggs and Partners, Architects, 2009

A landscaped plaza would be installed on the north face of the building, replacing the current surface parking lot. The plaza would include grassy treed panels on either side of the entrance. An additional lawn area is envisioned for the northwest corner of the lot, with a hardened seatwall defining the edges of the panel on 3nd and C Streets. Wide rectilinear paths would bisect the plaza, allowing for circulation between 2nd, 3rd and C Streets, and the entrance to the building. The below grade parking garage, loading dock and service areas would continue to be accessed from the drive on 2nd Street.

Under Alternative A, perimeter security would be provided largely between the sidewalk and the curb. Security elements would include a combination of low fences, tree boxes, hardened walls and seatwalls, and hardened streetscape features, such as bike racks, trash receptacles, and streetlights. These features would be set back two feet from the curb, per DDOT standards (Figure 2-3). Bollards would be utilized at entrances, corners, and where the security line crosses the sidewalk. Existing trees surrounding the site would be removed and replaced with new lines of trees between the sidewalk and the curbline.

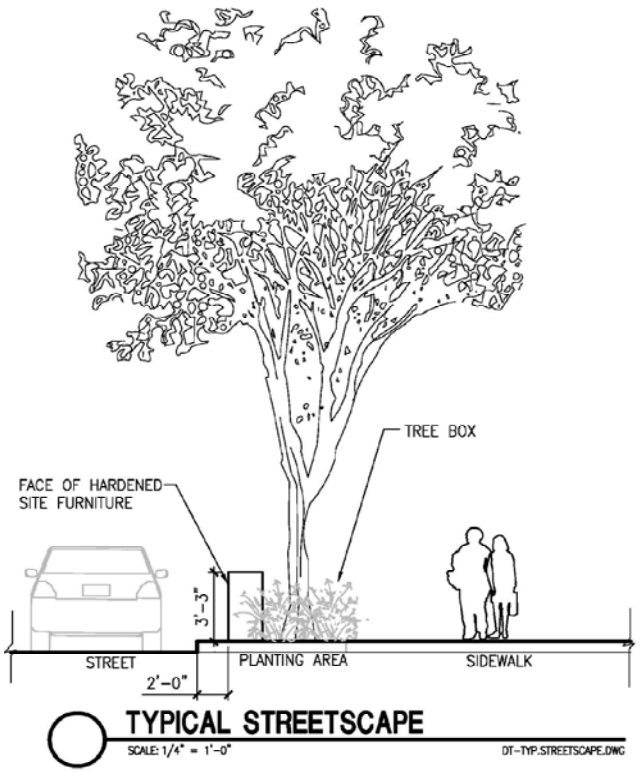

Figure 2-3: Typical Streetscape Condition
Source: EDAW, 2009

On C Street, the perimeter security would be provided through a hardened seatwall at the west end of the plaza (Figure 2-4), a low hardened wall bordering a grassy bed at the center of the block, and a hardened wall that currently defines the entrance to the parking garage on the east end of the site, approximately 94' from the north face of the building. Bollards would run between the small central grassy bed and entrance drive and planting bed walls. The proposed bollards would be 11" in diameter and spaced 4'11" apart on center, allowing for a 4' clearance.

On 2nd Street, retractable bollards or pop-up barriers would be employed at the garage entrance, and a small guard station would be located just south of entrance. South of the guard station, bollards would cross both the walk from the entrance plaza

and the sidewalk on 2nd Street. Moving south, a combination of hardened streetscape elements would be sited between the sidewalk and the curbline, approximately 26' from the face of the building. Near the south end of the block, these elements would be replaced with bollards and the security line would pull in slightly from the edge of the curb to accommodate an existing Metrorail vent.

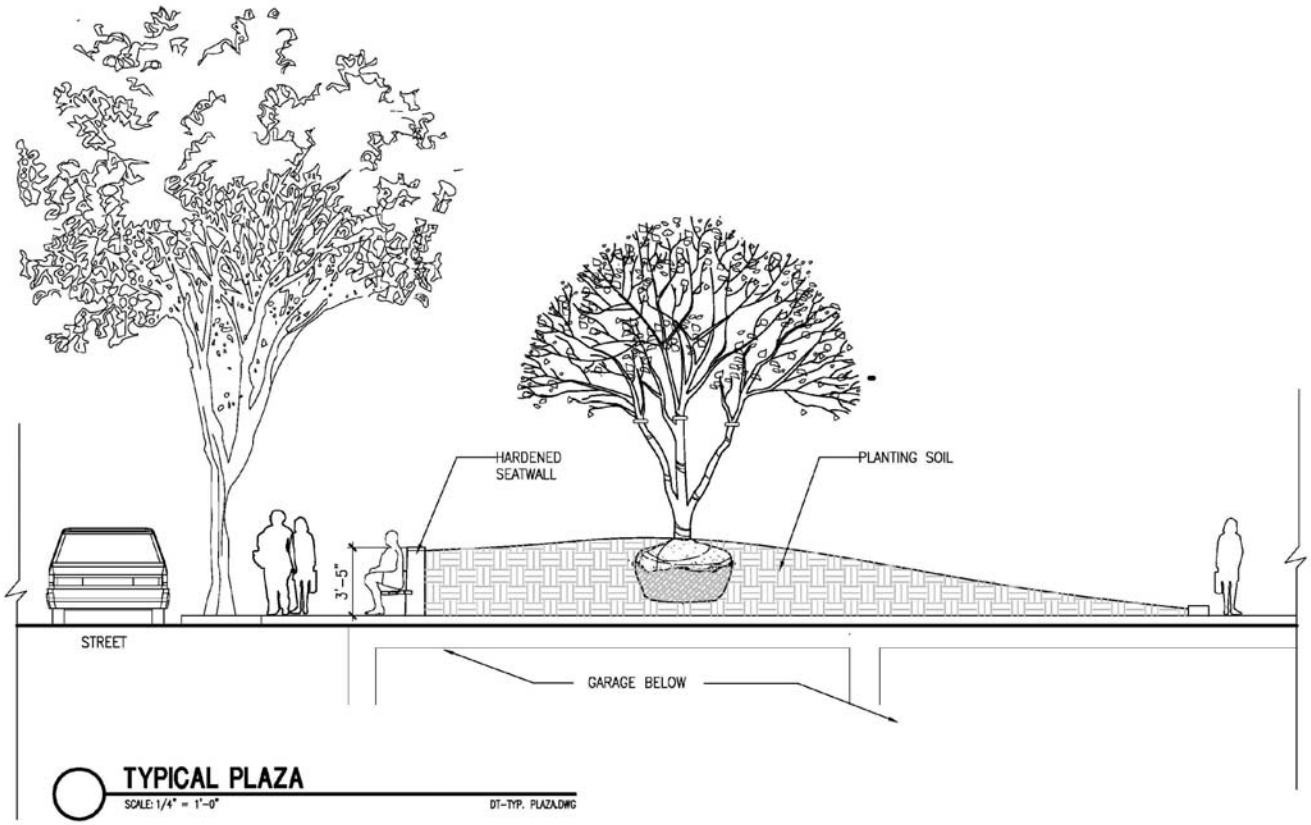

Figure 2-4: Typical Plaza Condition
Source: EDAW, 2009

On both D and 3rd Streets, the hardened streetscape elements would be placed between the sidewalk and the curbline. On D Street, the security elements would be located approximately 24' from the face of the building, while on 3rd Street they would be sited approximately 40' from the building face. Bollards would be employed at the entrance on D Street and at the corner of 3rd and D. Where the 3rd Street sidewalk meets the landscaped plaza, the security line would move from the outside of the sidewalk to the hardened walls along the edges of the two planting beds. At this point, bollards would cross the 3rd Street sidewalk and the east-west walkway through the entrance plaza (Figure 2-5).

Even though this is the preferred alternative, the defended standoff is less than what is required (50 feet) by the determined level of protection along 2nd, 3rd, and D Streets, and thus reflects the assumption of increased risk by the tenant agencies and GSA. The distance between the security features and each side of building face is illustrated in Table 2-2.

Figure 2-5: Alternative A Site Plan
Source: EDAW 2009

2.4 ALTERNATIVE B

Under Alternative B, exterior improvements would be made to FOB 8. The new glazing, skylight and security pavilion would be identical to those proposed under Alternative A (Figure 2-2). The bollards used in Alternative B will be of the same dimensions and spacing as in Alternative A.

A landscaped plaza would be installed on the north face of the building, replacing the current surface parking lot. The plaza would include grassy treed panels on either side of the entrance. Additional lawn areas are envisioned for the northwest corner of the lot and an area northeast of the entrance abutting the entrance drive to the garage. Both areas would be accessible to pedestrians through curved paths that cut through the plaza. A hardened seatwall would be provided on the edge of grassy area along 3rd and C Streets. Two oval planters with integrated seating would be located at the east and west ends of the curved paths. The below grade parking garage, loading dock, and service areas would continue to be accessed from the drive on 2nd Street.

With the exception of 3rd and C Streets, perimeter security would be provided between the sidewalk and the curb. Along 2nd and D Streets, security elements could include a combination of low fences, tree boxes, hardened walls and seatwalls, and hardened streetscape features, such as bike racks, trash receptacles, and streetlights (see Figure 2-3). Bollards would be utilized at entrances, corners, and where the security line crosses the sidewalk. Existing street trees would be removed and new trees would be installed between the sidewalk and the curbline. On 3rd Street, a low terrace wall would be sited between the edge of the building and the sidewalk.

On C Street, perimeter security would be provided through a hardened seatwall at the west end of the plaza (see Figure 2-4) and a hardened wall that currently defines the entrance to the parking garage, approximately 94' from the north face of the building. Bollards would run between the two northernmost grassy beds, set back slightly from the sidewalk. The trees along C Street and against the face of the building would be removed and replaced with a new line of trees between the curbline and the sidewalk.

On 2nd Street, retractable bollards or pop-up barriers would be employed at the garage entrance and a small guard booth would be constructed just south of the entrance drive. South of the guard station, bollards would cross the northern portion of the plaza pathway, meet the oval planter, and then cross the southern portion of the path and the sidewalk on 2nd Street. From there, a combination of hardened streetscape elements would be sited between sidewalk and the curbline, approximately 26' from the face of the building. Near the south end of the block, these elements would be replaced with bollards and the security line would pull in slightly from the edge of the curb to accommodate an existing Metrorail vent. The trees along 2nd Street would be removed and replaced with a new line of trees between the curbline and the sidewalk.

On D Street, the hardened streetscape elements would be placed between the sidewalk and the curbline, approximately 24' from the face of the building. Bollards would be employed at the entrance and at the corner of 3rd and D Streets, and existing street trees would be replaced. Turning north at 3rd Street, bollards would cross the sidewalk to meet a hardened guardrail along the edge of the sunken courtyard. North of the courtyard, bollards would cross a small entrance on 3rd Street. To the north, a hardened terrace wall located on the inside of the sidewalk would form the security line, running to the planting bed at the corner of the building, approximately 29' from the face of the building. Bollards would then cross the southern branch of the walkway to the main entrance, meet a hardened oval planter, and then cross the northern branch of the walkway to meet a hardened seatwall at the northwest corner of the plaza. The trees along D Street would be removed and replaced with a new line of trees between the curbline and the sidewalk (Figure 2-6).

The defended standoff on 3rd Street would be 11 feet less than what is provided for in Alternative A (a further reduction from what is required by the determined level of protection). The distance between the security features and each side of building face is illustrated in Table 2-2.

Figure 2-6: Alternative B Site Plan
Source: EDAW 2009

2.5 ALTERNATIVE C

Under Alternative C, exterior improvements would be made to FOB 8. The new glazing, security pavilion, and skylight would be identical to those proposed under Alternative A. The bollards used in Alternative C would be of the same dimensions and spacing as in Alternatives A and B.

A landscaped plaza would be installed on the north face of the building (C Street), replacing the current surface parking lot. The plaza would include grassy treed panels that would define the edges of a walkway angled from the northeast corner of the plaza to the southwest corner. An open plaza would be provided at the northwest corner of the site, with seating accommodated by a hardened seatwall. The below grade parking garage, loading dock and service areas would continue to be accessed from the drive on 2nd Street.

Perimeter security would be provided on 2nd, D, and 3rd Streets through a 39" hardened terrace wall located between the edge of the building and the sidewalk. On D Street, the wall would be located approximately 14' feet from the face of the building, while on 2nd Street the wall would be set approximately 17' from the building face. On 3rd Street, the space between the building face and terrace wall would be greater, approximately 29'. Bollards would be utilized at entrances and the guardrail above the sunken garden would be hardened to perform a security function. Trees along these roadways would be replaced with new lines of street trees.

At the landscaped plaza, the seatwalls would serve a security function (see Figure 2-4). Moving east, bollards would run between the two small hardened planting beds. The current wall along the edge of the entrance drive to the garage would be hardened, and retractable bollards or pop-up barriers would be employed at the drive itself. Bollards would cross the east and west ends of the plaza walkway, before meeting the hardened edge of the new planting beds that abut the north elevation of the building. Trees along C Street and against the face of the building would be removed and replaced with a new line of trees between the sidewalk and the curbline (Figure 2-7).

The defended standoff on all four sides is less than what is provided for in Alternatives A and B (a further reduction from what is required by the determined level of protection). The distance between the security features and each side of building face is illustrated in Table 2-2.

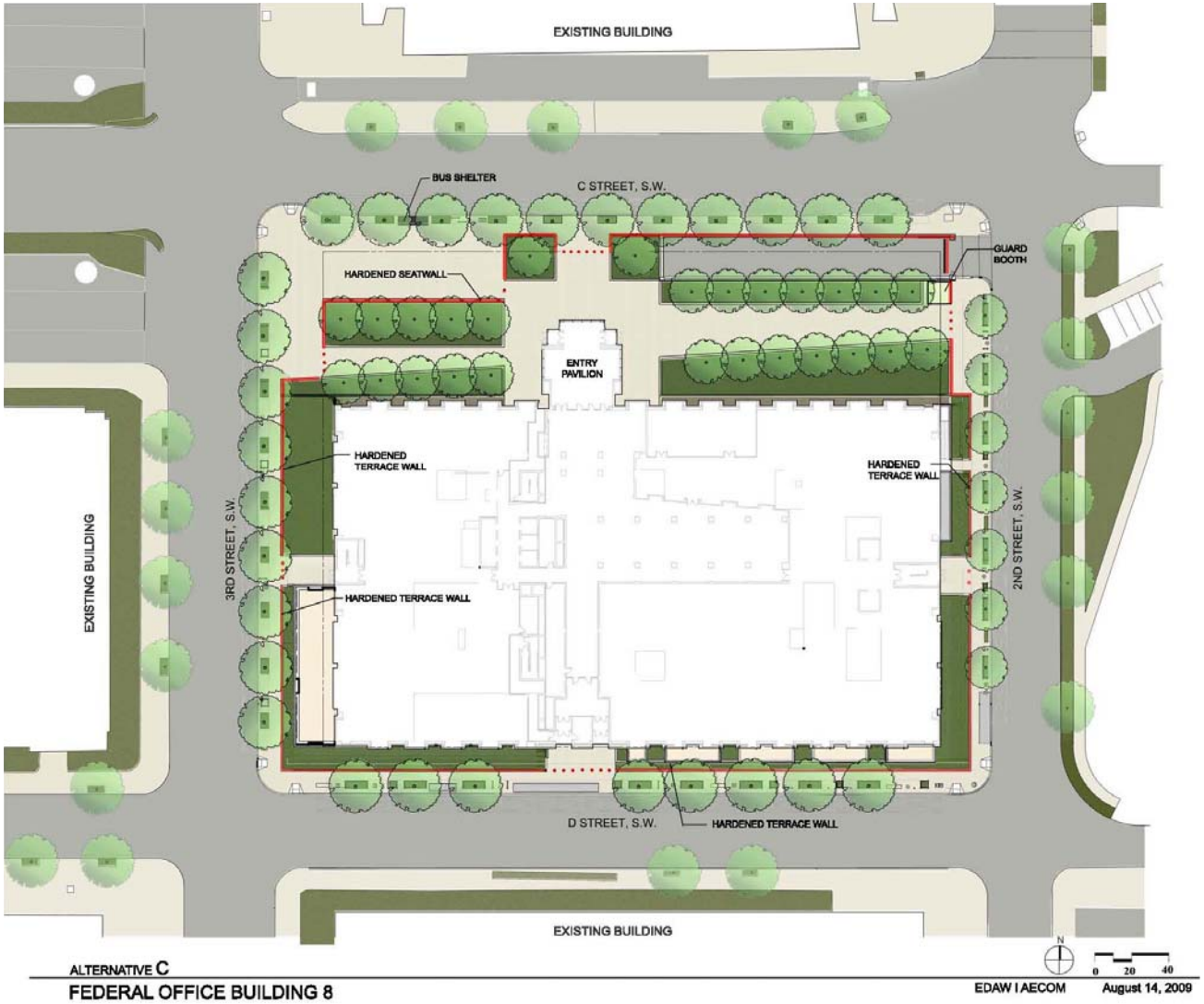

Figure 2-7: Alternative C Site Plan
Source: EDAW 2009

2.6 NO ACTION ALTERNATIVE

Under the No Action Alternative, the exterior of FOB 8 would not be improved. The surface parking lot on the north face of the building would remain and no perimeter security elements would be installed. The No Action Alternative would not meet the needs identified in GSA's risk assessment for the building, and thus either the building would remain vacant or alternative security measures would be required.

2.7 COMPARISON OF ALTERNATIVES

The exterior improvements to the building are consistent for all three alternatives and meet GSA's intent to provide high quality and secure office environments. As previously stated, this is accomplished through increasing the natural light in the building's interior. The exterior improvements also comply with ISC Standards that require blast resistant exterior walls and windows. Further, the pavilion would allow visitors and employees to undergo proper screening protocol prior to entering the building.

The three action alternatives differ in their placement of the security features around the building's perimeter and the design of the plaza along C Street. Alternative A would provide the largest defended standoff by locating security features along the curb on 2nd, D and 3rd Streets, and between the sidewalk and the building face on C Street. The landscaped plaza would provide an open plaza and seating for occupants of FOB 8 and the surrounding buildings. Alternative A best meets the purpose and need by enhancing the building and site and most closely conforming to the 50' setback required to meet the determined level of protection.

Alternative B would locate the security line between the sidewalk and the face of the building on 3rd and C Streets, and between the curbline and the sidewalk on 2nd and D Streets. As such, it represents a further reduction below the 50' standoff required to meet the medium level of protection. The landscaped plaza proposed in Alternative B would provide an open plaza and seating for building residents and visitors, including a grassy lawn near the northwest corner. The curved pathways are designed to funnel pedestrians through the plaza to points northeast and southwest of the site. Alternative B would meet the purpose and need by enhancing the building and site, and improving perimeter security.

Alternative C would provide the smallest defended standoff by locating security features inside of the sidewalk on each of the roadways. The landscaped plaza proposed in Alternative C would provide an open plaza and seating for building residents

and visitors focused on the northwest corner of the site. The angled pathways would facilitate circulation between the Metro station and the U.S. Capitol Building. Alternative C would meet the purpose and need by enhancing the building and site, and improving perimeter security, however it would not provide enough standoff required to meet a medium level of security.

Under the No Action Alternative, improvements would not occur at the site. This would not meet GSA's purpose and need.

Tables 2-1 and 2-2 summarize the major elements and proposed spatial conditions associated with each action alternative and the No Action Alternative.

Table 2-1: Comparison of Action Alternatives

Site Feature	Alternative A	Alternative B	Alternative C	No Action Alternative
Landscaped plaza	Funnels pedestrians to entry pavilion; most usable amount of public space	Funnels pedestrians through plaza, off-site	Funnels pedestrians through plaza, off-site	Would remain a surface parking lot
Building modernization	New glazing, new entry pavilion	New glazing, new entry pavilion	New glazing, new entry pavilion	Building would not be improved
Location of Security Features	Between sidewalk and curbline on 2nd, D and 3rd Streets; between sidewalk and building face on C Street	Between sidewalk and curbline on 2nd and D Streets; between sidewalk and building face on 3rd and C Streets	Between sidewalk and building face on all streets	No permanent security features would be installed

Table 2-2: Comparison of Spatial Conditions Under Existing Conditions and Each Alternative

		Approximate Distance from Building Face to Perimeter Security				Approximate Distance from Curbline to Perimeter Security		
Building Side	**Existing: Building Face to Building Yard**	**Alternative A**	**Alternative B**	**Alternative C**	**Existing: Building Face to Curbline**	**Alternative A**	**Alternative B**	**Alternative C**
C Street, SW	94’	94’	94’	55’/94’	103’	9’	9’	48’/9’
D Street, SW	14’	24’	24’	14’	26’	2’	2’	12’
2nd Street, SW	17’	26’	26’	17’	28’	2’	2’	11’
3rd Street, SW	29’	40’	29’	29’	42’	2’	13’	13’

Due to the variation in alternatives, each will have different affects on the surrounding area. The following table (Table 2-3) summarizes each alternative’s impact to the resources studied in this Environmental Assessment.

Table 2-3: Comparison of Impacts

Resource	Alternative A	Alternative B	Alternative C	No Action Alternative
Historic Resources	Negligible to minor long-term adverse impact to Switzer, Cohen, and Humphrey Buildings; minor to moderate long-term adverse impact to L'Enfant Plan	Negligible to minor long-term adverse impact to Switzer, Cohen, and Humphrey Buildings; minor to moderate long-term adverse impact to L'Enfant Plan	Negligible long-term impacts to surrounding historic properties and L'Enfant Plan	Negligible long-term impact
Archaeological Resources	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact
Visual Resources	Minor to moderate long-term adverse impacts on C, 2nd and 3rd Street; moderate long-term adverse impact on D Street; beneficial long-term impact from plaza and additional street trees	Minor to moderate long-term adverse impact on C and 2nd Streets; moderate long-term adverse impact along D Street; minor adverse impact on 3rd Street; beneficial long-term impact from plaza and additional street trees	Minor to moderate long-term adverse impact on C Street; minor long-term adverse impact along 2nd , 3rd and D Streets; beneficial long-term impact from plaza and additional street trees	Negligible long-term impact
Land Use	Beneficial long-term impact from removal of parking lot	Beneficial long-term impact from removal of parking lot	Beneficial long-term impact from removal of parking lot	Negligible long-term impact
Planning Policies	Moderate long-term adverse impact	Minor long-term adverse impact	Negligible long-term impact	Negligible long-term impact
Public Space	Moderate long-term adverse impact	Minor to moderate long-term adverse impact	Negligible to minor long-term impact	Negligible long-term impact
Vegetation	Moderate long-term adverse impact; beneficial long-term impact from landscaped plaza	Moderate long-term adverse impact; beneficial long-term impact from landscaped plaza	Moderate long-term adverse impact; beneficial long-term impact from landscaped plaza	Negligible long-term impact
Water Resources	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact
Vehicular Circulation	Short-term moderate adverse impacts; long-term negligible impacts	Short-term moderate adverse impacts; long-term negligible impacts	Short-term moderate adverse impacts; long-term negligible impacts	Negligible long-term impact
Parking	Short-and long-term minor adverse impacts	Short-and long-term minor adverse impacts	Short-and long-term minor adverse impacts	Negligible long-term impact

Resource	Alternative A	Alternative B	Alternative C	No Action Alternative
Public Transportation	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact
Pedestrian Circulation	Short and long-term moderate adverse impacts; beneficial impacts from public plaza	Short and long-term minor to moderate adverse impacts; beneficial impacts from public plaza	Negligible short and long-term impacts; beneficial impacts from public plaza	Negligible long-term impact
Utilities	Short-term moderate adverse impact	Short-term moderate adverse impact	Short-term moderate adverse impact	Negligible long-term impact
Stormwater Management	Short-term minor adverse and long-term beneficial impacts	Short-term minor adverse and long-term beneficial impacts	Short-term minor adverse and long-term beneficial impacts	Negligible long-term impact
Hazardous Waste/Contamination	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact	Negligible long-term impact
Air Quality	Short-term minor adverse impacts and negligible long-term impacts	Short-term minor adverse impacts and negligible long-term impacts	Short-term minor adverse impacts and negligible long-term impacts	Negligible long-term impact
Noise Levels	Short-term minor to moderate adverse impacts and negligible long-term impacts	Short-term minor to moderate adverse impacts and negligible long-term impacts	Short-term minor to moderate adverse impacts and negligible long-term impacts	Negligible long-term impact

2.8 SELECTION OF PREFERRED ALTERNATIVE

Alternative A was selected as the preferred alternative for the proposed exterior improvements to FOB 8. The rationale for choosing Alternative A as the preferred alternative is that it best complies with GSA's purpose to create secure, high quality office space and the need for this type of space in close proximity to the U.S. Capitol Building. In addition, Alternative A provides the most protection from security threats by locating security features as close to the required 50' setback as possible, without encroaching on the surrounding roadways. When looking at the overall layout and functionality of the site, Alternative A also creates the largest amount of usable public space within the plaza.

3.0

AFFECTED ENVIRONMENT

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3.0 AFFECTED ENVIRONMENT

3.1 CULTURAL RESOURCES

This section documents the potential archaeological, historic, and visual resources that are present on the FOB 8 site and within the surrounding area. This information was derived from historic maps, National Register nominations, prior studies, and field surveys. It was determined that the only impacts to archaeological resources would occur as a result of ground disturbing activities. Thus, the Area of Potential Effects (APE) for archeological resources includes the area between the face of the building and the curbline. Through the Section 106 process, the APE for historic resources was defined based on the potential for the proposed security improvements to be visible from historic properties surrounding the site. The area is generally bounded by: 4th Street, SW in the west, north to Jefferson Drive; east on Jefferson Drive to 3rd Street, SW; south on 3rd Street, SW to Maryland Avenue; northeast on Maryland Avenue to the U.S. Capitol Building; south from the Capitol Building on South Capitol Street to C Street, SW; west on C Street to 1st Street, SW; south along the 1st Street alignment to the railroad tracks; west along the railroad tracks to Virginia Avenue, SW; and northwest on Virginia Avenue, SW to 4th Street, SW (Figure 3-1). The study area for visual resources is identical to the APE for historic resources.

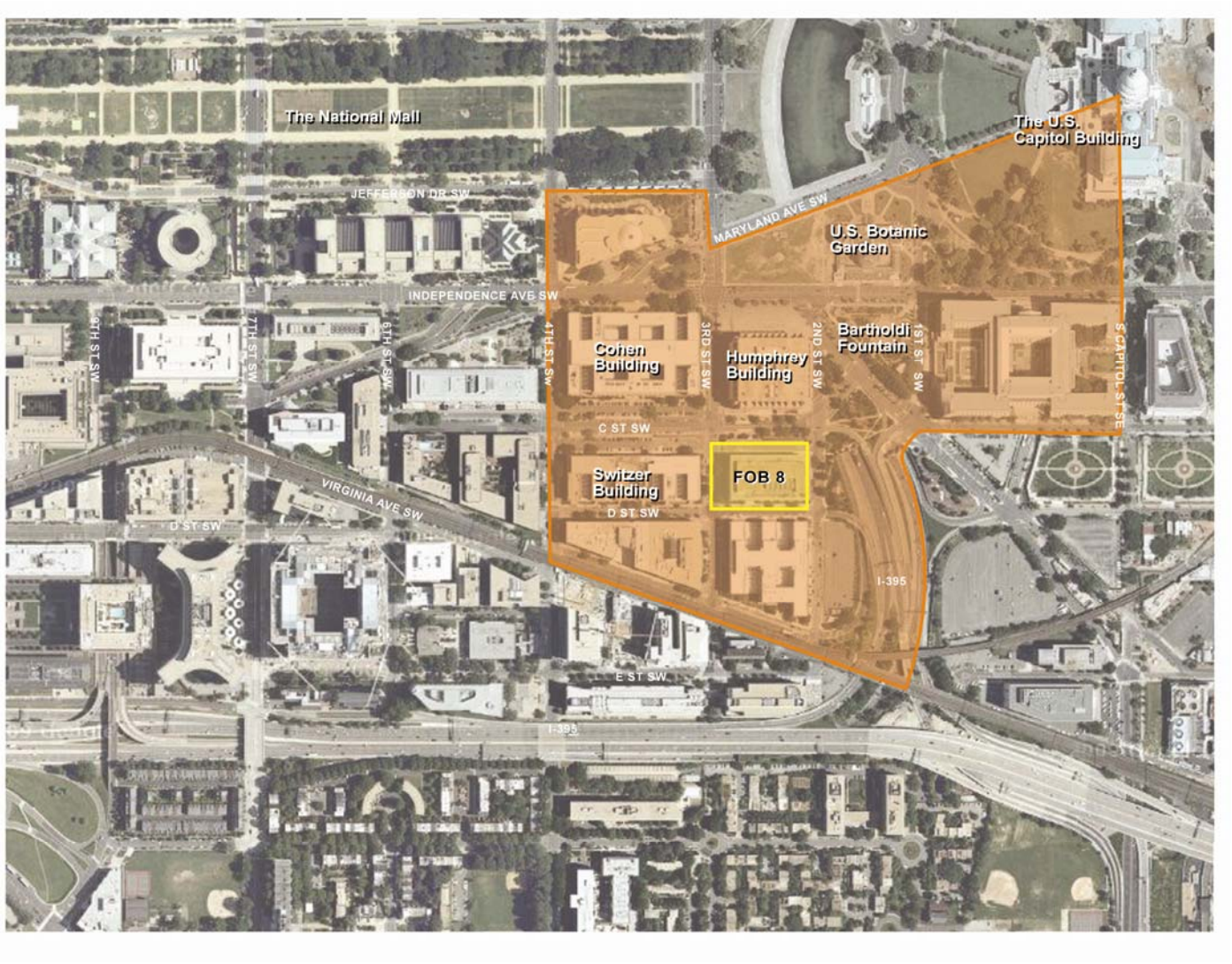

Figure 3-1: Area of Potential Effects for Historic Resources
Source: EDAW 2009

3.1.1 Archaeological Resources

As part of the larger Potomac River watershed, the land surrounding the Mall was historically marshland. Between 1810 and 1815, the Washington Canal was constructed north and east of the site, resulting in the filling of these marshes. The area's soils reflect this history: according to the U.S. Department of Agriculture's soil surveys, the area around FOB 8 is composed of Urban soils. Urban soils have a man-made surface layer that has been produced by mixing, filling, or by the contamination of land surface in urban and suburban areas. Due to the nature of the soils, and the fact that the site and immediate area were disturbed through construction activities for the building, roadways, and sidewalks, it is unlikely that intact prehistoric archaeological resources are present near the surface on the FOB 8 site.

During the 19th century, the project site was part of a residential community known as Southwest. Attractive to government workers due to the proximity to the Capitol, the area became a vibrant residential neighborhood. As residential development spread within Southwest, commercial establishments benefited. This portion of Southwest DC remained a combination of low-scale residential and commercial uses until the mid-20th century when urban renewal resulted in the demolition of more than half of the area's buildings. The area now known as the Southwest Federal Center was redeveloped with large-scale federal office buildings during the 1950s, 1960s, and 1970s.

According to historic Sanborn and Baist maps, the block now occupied by FOB 8 was fairly densely developed from the end of the 19th century through the middle of the 20th century. The structures were brick or frame and small in scale. A number of stables existed nearer the center of the site, off the main streets. The Metropolitan Wesley A.M.E. Zion Church, a modest sized brick structure, was located on D Street near the center of the block. The Watts and Brothers Coal and Wood Yard was located on C Street near the center of the block. By 1959, the buildings on the site had been razed and the block was being used for parking (Sanborn 1928-1959).

No archaeological surveys have been completed on the FOB 8 site. North of FOB 8, historic archaeological remains dating from the 18th century were documented in a survey completed prior to the construction of the NMAI building (John Milner and Associates 1993). Although it is possible that similar historic archaeological resources were present on the FOB 8 site, it is likely that they have been disturbed due to the urban renewal efforts in the 1950s and the construction of FOB 8 itself.

3.1.2 Historic Resources

FOB 8

FOB 8 was constructed in 1965 as laboratory space for the Food and Drug Administration. As is characteristic of many modern buildings from this period, FOB 8 is set back significantly from C Street, SW. The area between the north face of the building and C Street was designed as a parking lot. GSA and the District of Columbia State Historic Preservation Officer are in concurrence that FOB 8 does not meet the criteria for listing in the National Register of Historic Places.

L'Enfant and McMillan Plans

The project site is bordered by streets originally planned by Pierre Charles L'Enfant in the 18th century. Recognized as one of the country's most notable achievements in urban planning, the L'Enfant Plan, completed in 1791, is characterized by a coordinated system of radiating avenues, vistas, and parks overlaid upon an orthogonal grid of streets (Figure 3-2). A notable example of Baroque city planning, L'Enfant's Plan defines the physical and symbolic character of the capital city through its arrangement of roadways, buildings, parks, and views. At the turn of the 20th century, the McMillan Commission expanded on the L'Enfant Plan in a manner consistent with the City Beautiful movement. The McMillan Plan extended the Mall to the west and terminated several important visual axes with monuments. The principles articulated in these plans still guide the development of the city today.

Figure 3-2: L'Enfant Plan for the City of Washington, 1791
Source: NCPC

The Plan of the City of Washington is listed in the National Register of Historic Places, and is also a city landmark, listed in the District of Columbia Inventory of Historic Sites. The designation recognizes components of the McMillan Plan that contribute to, extend, or enhance the L'Enfant Plan. The period of significance is 1791-1942. The National Register nomination for the

L'Enfant Plan identifies historic streets, reservations and appropriations, and vistas that contribute to the plan's significance. The portions of 3rd Street, SW, C Street, SW, and D Street, SW that border the project site are all contributing elements within the L'Enfant Plan. In addition, the Capitol Grounds and the National Mall east of 14th Street comprise L'Enfant's Original Appropriation Number 2. The vista along C Street, SW, is identified within the nomination as being interrupted by I-395 east of the project site and at 5th Street west of the project site.

Mall

Northwest of FOB 8, the Mall was a key component of L'Enfant and McMillan's plans for the city. The Mall extends from the Capitol Grounds in the east to 14th Street in the west, and from Constitution Avenue in the north to Independence Avenue in the south (Figure 3-3). Numerous national museums line the Mall, and a tree-lined greensward runs through the center. The Mall was listed in the DC Inventory in 1964 and the National Register in 1966. It is also a component of the National Register Multiple Property Nomination for the L'Enfant Plan. In 2006, a cultural landscape inventory was completed for the Mall which identified contributing features and concluded that, while not a National Historic Landmark, the Mall clearly has national significance. FOB 8 is visible in views south on 3rd Street from the Mall (Figure 3-4).

Figure 3-3: The Mall
Source: EDAW, 2009

Figure 3-4: View south on 3rd Street from the National Mall
Source: EDAW, 2009

The U.S. Capitol Building and Grounds

The U.S. Capitol Building is one of the nation's iconic historic buildings. Located approximately ¼ mile northeast of FOB 8 (Figure 3-6), the Neoclassical style structure was designed by William Thornton in 1793, and then renovated and expanded in the 19th century by Benjamin Latrobe, Charles Bulfinch, and Thomas U. Walter. The structure is characterized by a large columned portico on the front of the building, and a massive dome that caps the structure (Figure 3-5). The monumental building is sited on an original L'Enfant Appropriation and is set within a landscape designed by Frederick Law Olmsted. Both the Capitol dome and the grounds are visible from the northeast corner of FOB 8. The Capitol was designated a National Historic Landmark in 1960 and listed in the DC Inventory of Historic Sites in 1964.

Figure 3-5: U.S. Capitol Building
Source: EDAW, 2009

Figure 3-6: View to U.S. Capitol from the northeast corner of the project site
Source: EDAW, 2008

Hubert H. Humphrey Building

The Hubert H. Humphrey Building is located north of FOB 8 across C Street (Figure 3-8). Constructed in 1976, the building is one of two Modernist style structures in Southwest DC by renowned architect Marcel Breuer, the other being the Department of Housing and Urban Development Building. The Humphrey Building is a six-story concrete structure with a brise soleil, a penthouse, and a recessed ground floor (Figure 3-7). Although not yet 50 years old, the Humphrey Building could potentially be eligible for the National Register both for its design and as the work of a master architect.

Figure 3-7: Hubert H. Humphrey Building
Source: EDAW, 2008

Figure 3-8: View of Hubert H. Humphrey Building from FOB 8
Source: EDAW, 2009

Mary Switzer Building (Railroad Retirement Board Building)

Located directly west of FOB 8, the Mary Switzer Building was designed by Charles Klauder and constructed in 1939-1940. One of the last buildings erected under the massive federal office construction program of the 1920s and 1930s, the Switzer Building is a secondary component within a jointly planned complex that includes the Wilbur J. Cohen Building (originally constructed for the Social Security Administration) to the north. The structure was designed in the Stripped Classical style. Distinctive features include monumental windows and pylons, and Egyptian motifs that adorn the sandstone facades (Figure 3-9). In plan, the building resembles a half-fishbone, with six wings that extend off a main base. The Switzer Building has been determined to be eligible for listing in the National Register of Historic Places.

Figure 3-9: Mary Switzer Building
Source: EDAW, 2008

Wilbur J. Cohen Building

Northwest of FOB 8, the Wilbur J. Cohen Building was constructed in 1939 for the Social Security Administration. Like the Switzer Building to the south, the structure was designed by Charles Klauder and is representative of the Stripped Classical style with its bands of vertically oriented windows (Figure 3-10). The building is significant for its role in city planning in the District of Columbia, as well as the last work of a prominent architect known for his skill in melding historical references with modern programmatic needs. It is further significant for its association with the Social Security Administration and the New Deal. The Wilbur J. Cohen Building was listed in the DC Inventory of Historic Sites and the National Register of Historic Places in 2007.

Figure 3-10: Wilbur J. Cohen Building
Source: EDAW, 2008

U.S. Botanic Garden

The Botanic Garden, located north of FOB 8 within the Capitol Grounds, showcases diverse vegetative species and ecosystems in varying climatic exhibits. The garden was originally established by Congress in 1820, and remains one of the largest of its kind in North America. Designed in the Beaux Arts Style by Bennett Parsons & Frost in 1902, the garden was listed in the DC Inventory of Historic Sites in 1964. It also lies within the bounds of the National Mall (Figures 3-11 and 3-12).

Figure 3-11: U.S. Botanic Garden
Source: EDAW, 2008

Figure 3-12: View of U.S. Botanic Garden from FOB 8
Source: EDAW, 2009

Bartholdi Fountain

The Bartholdi Fountain has been a prominent feature on the grounds of the U.S. Botanic Garden since 1878. The elaborate tiered cast iron fountain is the work of Frederic Auguste Bartholdi, sculptor of the Statue of Liberty. The fountain was exhibited alongside the Statue of Liberty at the Philadelphia Centennial Exhibition in 1876 and was then subsequently purchased by the federal government. Its elaborate form rises 30 feet above a marble pool, with three colossal caryatids supporting a water basin, attended by tritons, reptiles, and dolphins. Twelve light globes circle the rim of the basin. The fountain was listed in the DC Inventory of Historic Sites in 1964 (Figure 3-13). The fountain may be visible from the northeast corner of FOB 8 during the winter months.

Figure 3-13: The Bartholdi Fountain
Source: Wikipedia, 2009

3.1.3 Visual Resources

Methodology

This section documents the existing visual character of FOB 8 and the surrounding area. The study area for visual resources was determined by estimating the visibility of FOB 8, and thus the proposed exterior improvements, to viewers from public places and historic resources. Due to the urban density of the Southwest Federal Center neighborhood, views are generally afforded along the streets that border the site, including C, 3rd, D, and 2nd Streets, SW. In addition, views are afforded from the open parcels east of the site, northeast towards the U.S. Capitol Building, and southwest from the Capitol Grounds to FOB 8. The visual character of the roadways, buildings, and open space that border the site are described below.

Existing Visual Environment

C Street, SW/North of the Site

C Street, SW borders the FOB 8 site to the north. The two-lane roadway is bordered on the north and south sides by massive mid-rise federal office buildings. On the south side of the street, both FOB 8 and the Switzer Building are setback substantially from C Street, allowing for surface parking between the building entrances and the street. The surface parking lot at FOB 8 is currently encircled by a tall fence. In addition to surface parking, FOB 8 has an access drive to a below-grade parking garage. A low wall divides the C Street sidewalk from the drive at the eastern end of the block. On the north side of C Street, the Humphrey and Cohen Buildings are set closer to the roadway, both buildings lacking substantial building yards. East and west of the site, the roadway and associated view corridors are interrupted. The view west from the site terminates at a large building at 5th Street, SW (Figure 3-15). The C Street view corridor terminates at 2nd Street immediately east of the site at a small green parcel (Figure 3-14). When I-395 was constructed in the 1960s, C Street, SW, was realigned east of 2nd Street, such that it now turns to the northeast (Figure 3-16). Views are thus afforded of the Capitol Building from the northeast corner of the project site.

Figure 3-14: View east on C Street from 3rd Street, SW
Source: EDAW, 2008

Figure 3-15: View west on C Street with FOB 8 and the Switzer Building in the foreground
Source: EDAW, 2008

Figure 3-16: View along the diagonal portion of C Street from the northeast corner of the project site
Source: EDAW, 2008

3rd Street, SW/West of the Site

Bordering FOB 8 to the west, 3rd Street, SW is a four-lane roadway that runs north-south, following L'Enfant's city grid. Views along 3rd Street are framed by mid-rise buildings and a variety of street trees. The sidewalk adjacent to FOB 8 is narrow, mirroring the walk on the west side of the street adjacent to the Switzer Building (Figure 3-17). There is a small planting bed and a sunken garden located between the sidewalk and FOB 8 at the south end of the block. At the north end of the block, the green strip is wider and extends to the face of the building; however, this area is currently blocked from view by a tall fence. Views are afforded to the north along 3rd Street to the Mall (Figure 3-18). Views to the south along 3rd Street are obstructed by the elevated railroad lines one block south of FOB 8.

Figure 3-17: View looking north along 3rd Street from D Street, SW
Source: EDAW, 2008

Figure 3-18: View looking north on 3rd Street near C Street, SW
Source: EDAW, 2008

D Street, SW/South of the Site

D Street, SW is a narrow one-way street that borders FOB 8 to the south. On the north side of D Street, adjacent to FOB 8, the sidewalk is narrow. A line of street trees and lampposts run between the curb and the sidewalk. Inside of the walk, a narrow, slightly raised planting bed contains a line of low shrubs and small trees. Between the trees, a series of light wells provide natural light to the building's lower level. On the south side of the street, a line of uniform bollards placed between the sidewalk and the roadway encircles the Ford House Office Building. Views along D Street are framed by street trees of varying sizes and modern mid-rise buildings. Views to the east include the on ramp to I-395 and greenspace beyond the highway infrastructure (Figure 3-19). Views to the west terminate at 4th Street, SW, where a building interrupts L'Enfant's historic street alignment (Figure 3-20).

Figure 3-19: View looking east on D Street, SW with FOB 8 on the left
Source: EDAW, 2008

Figure 3-20: View along D Street, SW looking west with FOB 8 on the right
Source: EDAW, 2008

2nd Street, SW/East of the Site

East of FOB 8, 2nd Street, SW runs in two lanes one-way from the north to the south. On the west side of the street, adjacent to FOB 8, the sidewalk is narrow. Between the sidewalk and the building face, a planting bed containing both trees and shrubs creates a green edge. On the east side of the street, the sidewalk divides the roadway from a small park, the future site of the American Veterans Disabled for Life Memorial. To the south, at the intersection of 2nd and D Streets, SW, there is an access ramp to the recessed portion of I-395 (Figure 3-21). Views north and south along the 2nd Street corridor include mid-rise office buildings, open greenspace, highway infrastructure, surface parking, and the elevated railway south of FOB 8 at Virginia Avenue (Figure 3-22). From the corner of 2nd and C Streets, SW views are afforded of the U.S. Capitol Building to the northeast.

Figure 3-21: View south on 2nd Street from C Street, with FOB 8 on the right
Source: EDAW, 2008

Figure 3-22: View north on 2nd Street, SW with the Humphrey Building on the left and the National Mall and U.S. Botanic Garden in the Center of the View
Source: EDAW, 2008

3.2 SOCIOECONOMIC RESOURCES

3.2.1 Land Use

FOB 8 is a government-owned building located within the Southwest Federal Center, two blocks from the U.S. Capitol Building and grounds. Bounded by 2nd Street to the east, 3rd Street to the west, C Street to the north, and D Street to the south, the 2.1-acre site occupies a full city block. The structure is six-stories high, with two additional stories located below grade. The main pedestrian entrance is on C Street, where an approximately 100-foot setback allows for a surface parking lot for the building. An additional below-grade parking area is accessed via a ramp off of 2nd Street. Constructed in 1965 as laboratory space for the U.S. Food and Drug Administration (FDA), FOB 8 has been vacant since FDA relocated in 2002. While GSA owns the building, the surrounding sidewalks are under the jurisdiction of the District of Columbia.

The area surrounding FOB 8 is dominated by mid-rise federal office buildings. Like FOB 8, many of these structures fill a full city block. The Hubert Humphrey Building is sited directly north of FOB 8, across C Street. This structure houses the Department of Health and Human Services. Northeast of FOB 8, across Interstate 395 (I-395), the Rayburn House Office Building is occupied by the U.S. House of Representatives. The Cohen Building lies northwest of FOB 8 and is occupied by the Department of Health and Human Services. The Ford House Office Building, which houses Congressional staff and the Architect of the Capitol, borders FOB 8 to the south. Privately owned commercial office buildings are located southwest of FOB 8 at 3rd and D Streets, and 4th and E Streets.

There are several small parks and larger areas of open space in the immediate vicinity of FOB 8. Directly east and northeast of the site, across 2nd Street, are several small, irregularly shaped parcels, each landscaped and traversed by sidewalks. The parcel directly east of the site acts as a partial barrier to the I-395 underpass. A parcel to the northeast is the planned location for the American Veterans Disabled for Life Memorial. Further north and east of the site, the National Garden, Bartholdi Park, and the U.S. Capitol Grounds offer additional public open space. The largest area of greenspace in the downtown, the National Mall, lies one block north of FOB 8 and stretches from the U.S. Capitol grounds in the east to the Washington Monument grounds in the west.

Other land uses in the area include cultural attractions, retail establishments, and transportation infrastructure. The National Air and Space Museum and the National Museum of the American Indian are located to the north of FOB 8 along the edge of

the Mall. The U.S. Capitol Building, located two blocks northeast of FOB 8, also functions as a civic and cultural institution and is open daily for public tours.

Interstate 395 runs below grade directly east of the site and access to this highway is provided via an onramp at 2nd Street. The Federal Center-SW Metrorail Station is located less than one block from the site, at the intersection of 3rd and D Streets, SW. A rail line also runs along Virginia Ave SW and crosses over I-395 two blocks to the south. Finally, several surface lots and parking structures are located within the vicinity of FOB 8.

3.2.2 Planning Controls and Policies

Zoning

As a federally-owned property, FOB 8 is not subject to DC zoning regulations. Instead, new design and renovation projects on federal property are under the purview of NCPC, pursuant to the District of Columbia Zoning Enabling Act of 1938 (ch. 534, 52 Stat. 802 and DC ST § 6-641.15). In accordance with the Act, NCPC has approval authority for use, open space, height, and bulk, for projects on federal property.

Comprehensive Plan for the National Capital (2004)

The *Comprehensive Plan for the National Capital, Federal Elements* is the principal planning tool used by NCPC to guide the planning of federal facilities in Washington, DC. The Plan is comprised of goals, objectives, and policies intended to guide growth and development in the Nation's Capital. There are two elements that are of particular relevance to the proposed perimeter security project at FOB 8, the Federal Workplace Element and the Preservation and Historic Features Element.

The Federal Workplace Element states that it is the goal of the federal government in the National Capital Region to: "Locate the federal workforce to enhance the efficiency, productivity, and public image of the federal government; to strengthen the economic well-being and expand employment opportunities of the region and the localities therein; and to give emphasis to the District of Columbia as the seat of the national government." This element outlines policies in support of this goal that address perimeter security and include the following:

- Design such improvements in accordance with guidance included in *The National Capital Urban Design and Security Plan (and related policies).*

- Incorporate security needs into the design of buildings, streetscapes, and landscapes using urban design principals in a manner that: enhances and beautifies the public realm, resulting in coherent and welcoming streetscapes; does not excessively restrict or impede operational use of sidewalks or pedestrian, handicap, or vehicular mobility; and does not impact the health of existing mature trees.
- Design projects in a manner that does not impede commerce and economic vitality, but balances the need for perimeter security with the need to enhance and maintain the vitality of urban areas.
- Design security barrier lines and elements that complement and enhance the character of the area in which they will be located and that respect the historic context of the area when applicable.
- Design security elements to respond to site-specific conditions, such as vehicle approach speed and angles, in order to minimize the size of security elements when possible.
- Place security elements in the building yard, rather than in public space where possible.

The Preservation and Historic Features Element states that it is the goal of the federal government to: "Preserve and enhance the image and identity of the nation's capital and region through design and development that is respectful of the guiding principles of the L'Enfant and McMillan Plans, the enduring value of historic buildings and places, and the symbolic character of the capital's setting." Policies in support of this goal that are applicable to the FOB 8 exterior improvements include the following:

- Protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital's image.
- Promote continuity in the historic design framework of the nation's capital by protecting and enhancing the elements, views, and principles of the L'Enfant Plan.
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.

National Capital Urban Design and Security Plan (2002) and *Urban Design and Security Plan Policies and Objectives (2005)*

NCPC's *National Capital Urban Design and Security Plan* (adopted May 5, 2005) seeks to balance the security needs and requirements of federal agencies with the need to protect the historic urban fabric of Washington, DC. The Plan holds that

security elements for federal buildings should be enhanced in a manner that does not compromise the vitality and function of the public realm, be it pedestrian circulation, vehicular mobility, commerce, or the aesthetic experience of visitors. To this end, the Plan establishes a series of goals. These goals are as follows:

- Provide appropriate levels of perimeter security for sensitive buildings and their occupants against threats generated by unauthorized vehicles approaching or entering them.
- Provide security in the context of a city-wide program of streetscape enhancement and public realm beautification, rather than as a separate or redundant system of components whose only purpose is security.
- Expand the palette of elements that can gracefully provide perimeter standoff security, avoiding the monotony of endless lines of jersey barriers or bollards, which only invoke defensiveness.
- Produce a coherent strategy for deploying specific families of streetscape and security elements in which priority is given to achieving aesthetic continuity along streets, and within areas, rather than solutions selected solely by the needs of a particular building under the jurisdiction of one public agency.
- Provide perimeter security in a manner that does not impede the City's commerce and vitality, pedestrian or vehicular mobility, or operational use of sidewalks within the Monumental Core or downtown.

In order to achieve these goals, the Plan offers a variety of design elements that can be used in perimeter security projects. These solutions include such physical elements as “hardened” or fortified street furniture, planters, and fences, low stone plinth walls, bollards, large round linear planters with seating, bicycle racks, and curbside hedges with embedded security measures. Potential security measures should be designed to be applied in a variety of different contexts and ways to meet the specific security and design needs of each particular downtown area.

The *Urban Design and Security Plan Policies and Objectives* was adopted in 2005 to clarify issues related to contextual design, vehicular and pedestrian controls, and the placement and design of physical security elements. The objectives and policies are intended to be used to guide federal agencies when evaluating, planning, and designing proposed perimeter security projects.

The policies and objectives include the following:

- Strike a balance between physical perimeter security for federal buildings and the vitality of the public realm.

- Encourage a multi-faceted approach to selection of appropriate security measures that considers intelligence information, operational and procedural measures (such as surveillance and screening), and design strategies (such as structural engineering, window glazing, emergency egress, and physical perimeter barriers).
- Intelligence information, operational controls, and physical design measures should be used to protect against vehicle-borne explosives.
- The placement of physical security barriers in public space is discouraged and should be minimized.
- 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 perimeter security barriers may be permitted in public space adjacent to the building.
- Perimeter security barriers at intersections, corners and near crosswalks or other highly used pedestrian areas should be minimized; barriers that are needed should be located to allow safe pedestrian waiting areas and pedestrian movement.
- The design of security barriers, including their mass, form and materials should respond to the architectural and landscape context in which they are located and complement and aesthetically enhance the special character of the associated building and precinct.
- Perimeter security barriers in public space should incorporate decorative tree wells, planters, light poles, signage, benches, parking meters, trash receptacles and other elements and public amenities typically found in a streetscape.

National Capital Framework Plan (2008)

The *National Capital Framework Plan*, released in the summer of 2008, is the result of a joint planning effort between NCPC and the U.S. Commission of Fine Arts (CFA). The Plan serves as a tool to guide strategic decisions to coordinate federal and local interests, identifying opportunities to coordinate land use, urban design, and transportation improvements. The principal goals of the Plan are to: Plan for the future needs of the federal government, including space for new memorials, museums, public gathering spaces, and federal offices in a way that contributes to sustainable city life; preserve the historic open space of the National Mall and protect it from overbuilding; and extend the special civic qualities of the National Mall and the vitality and vibrancy of the city into the adjacent federal precincts.

In order to accomplish these goals, the Plan identifies four major precincts adjacent to the National Mall which are to be the focus for future cultural attractions and government offices. The four precincts are: the Northwest Rectangle, Federal Triangle, the Southwest Rectangle, and East Potomac Park. The Framework Plan examines opportunities to enhance these precincts in order to meet the future needs of the federal government, while also protecting the city's open space and public realm.

As identified within the Plan, the Southwest Rectangle precinct generally stretches from Jefferson Drive, SW on the north to the Southeast Freeway and the 10th Street Overlook on the south, and from 15th Street, SW on the west to the Center Leg Freeway on the east. FOB 8 is located at the east end of this area. The Plan states that the primary objective for the Southwest Rectangle is to transform it from a sterile office precinct to a desirable workplace, cultural venue, and visitor destination through improved connections between the Smithsonian Castle and the Southwest waterfront, and between the U.S. Capitol and the Jefferson Memorial. Specific strategies to achieve this objective include the following:

- Establish 10th Street, SW and the Overlook as a lively mixed-use corridor and premier cultural destination to connect the National Mall and the Southwest waterfront;
- Establish Maryland Avenue, SW as a grand urban boulevard to link the U.S. Capitol to the Jefferson Memorial;
- Create new places for museums, offices, shops, and residences to increase the mix of uses within the precinct; and
- Bridge the Potomac River and restore the street grid to improve mobility.

Tree Removal Permit

The Urban Forestry Administration, under the District Department of Transportation (DDOT), requires permits for the removal of street trees. Specifically, the Urban Forest Preservation Act of 2002, effective June 12, 2003 (D.C. Law 14-309; D.C. Official Code 8-6501.01 *et seq.*), established an urban forest preservation program requiring a Special Tree Removal Permit prior to the removal of a tree with a circumference of 55 inches or more. If a tree removal permit is approved, the Urban Forestry Administration will require the replacement of lost trees based on caliper, either on the site or in a comparable area.

3.2.3 Public Space

The District of Columbia Department of Transportation, Public Space Management

The District Department of Transportation (DDOT) has management and oversight responsibility for the use and occupancy of the public space. According to DDOT, public space is defined as all the publicly owned property between the property lines on a street and includes, but is not limited to, the roadway, tree spaces, sidewalks, and alleys. The sidewalks and the area between the walks and curbline around FOB 8 are considered to be public space under the jurisdiction of DDOT.

DDOT encourages that security perimeters be established within privately-owned space or federal public space adjacent to buildings, not on sidewalks, curbs, gutters, streets, or public alleys. In the event that perimeter security elements are proposed within public space, a Public Space Permit must be obtained from DDOT. Further, DDOT requires that perimeter barriers be no closer than two feet from the curb line and neither block pedestrian traffic flow from the curb line to the sidewalk, nor present unreasonable barriers to pedestrians traveling within the sidewalk.

GSA: Achieving Great Federal Public Spaces

Although not directly related to DDOT's public space policy and review, GSA has published guidelines titled *Achieving Great Federal Public Spaces: A Property Manager's Guide*. This publication was released in 2007 as part of GSA's efforts to evaluate and improve public spaces and transform federal spaces into civic places. According to this guide, GSA buildings and public spaces should:

- Reflect the dignity and accessibility of government;
- Be secure and welcoming;
- Improve tenant satisfaction and building revenue;
- Provide a forum for tenant activity and public use; and
- Act as a catalyst for downtown revitalization.

The guide presents an overall strategy for improvement of a facility's public spaces, from physical enhancements to partnerships with communities, to better management practices. It recognizes a key challenge to be the need to increase security at federal facilities while providing welcoming public spaces.

3.3 NATURAL RESOURCES

The study area for the inventory and analysis of physical and biological resources has been defined as the area around FOB 8 as bordered by C, D, 2nd, and 3rd Streets, SW. In preparing this analysis, the following resources were reviewed: U.S. Geological Survey (USGS) mapping, aerial photos, local comprehensive and land use plans, Geographic Information System (GIS) databases, conceptual design drawings, scientific literature, government reports, other previous studies, agency comments, and other materials as needed. Site visits to the grounds around FOB 8 were also conducted.

3.3.1 Vegetation

Vegetation around FOB 8 was inventoried through site reconnaissance and a review of the most recent survey drafted in 2006. The vegetation consists entirely of streetscape plantings and modest landscaping adjacent the building. Along C Street, SW, these plantings consist of yews (*Taxus* sp.), creeping juniper (*Juniperus horizontalis*), and crepe myrtle (*Lagerstroemia indica*) and two large oak trees at the curbline. Boxwoods (*Buxux* sp.) and flowering cherries (*Malus* sp.) are planted along 2nd Street, SW. Along D Street, SW, shrubs include boxwood, crepe myrtle, junipers (*Juniperus* sp.), holly (*Ilex* sp.), and abelia (*Abelia grandiflora*) with some yarrow (*Achillea* sp.) planted as well. Scarlet oaks (*Quercus coccinea*) are present along the street. Street trees along 3rd Street include swamp white oaks (*Quercus bicolor*), white oak (*Q. alba*), scarlet oaks, and a large magnolia (*Magnolia* sp.) at the building's northwest corner (Figure 3-23). Additional plantings along 3rd Street, SW include crepe myrtle, and Japanese maples (*Acer japonica*).

Figure 3-23: Magnolia at the corner of C and 3rd Streets, SW
Source: EDAW, 2008

3.3.2 Water Resources

The District of Columbia Department of Health (DDOH) Water Quality Division, the DDOH Watershed Protection Division, and the U.S. Environmental Protection Agency (EPA) regulate water resources and water pollution in the District. Together, they administer programs created by the Federal Water Pollution Control Act of 1972 (commonly known as the Clean Water Act), the federal Water Quality Act of 1987, and a 1984 amendment to the federal Resource Conservation and Recovery Act (RCRA). In addition, the Water Quality Division administers programs enacted by the Water Pollution Control Act of 1948 and implements the Water Quality Standards for Surface Water. Building construction and use can affect water quality and aquatic ecosystems by altering the dominant hydrodynamics (i.e., the volume and timing of flows), increasing water temperature, and contributing pollutants and particulates to downstream surface water bodies.

There are no surface water bodies in the vicinity of FOB 8. All stormwater drainage moves overland into area drains or the street curb and gutter system for discharge to the DC Water and Sewer Authority (DC WASA) storm sewer system. Preliminary floodplain mapping produced by the Federal Emergency Management Agency (FEMA) has indicated that if the current levee system is not updated, the FOB 8 site would be within the 100-year floodplain. Construction of the new levee system is expected to commence in 2009. As a result, it is unlikely that FOB 8 will be located within the 100-year floodplain.

3.4 TRANSPORTATION

3.4.1 Vehicular Circulation

The transportation network in the vicinity of FOB 8 includes both local roadways and a federal highway. The FOB 8 site is bordered by four local roadways, C Street, SW in the north, 3rd Street, SW in the west, D Street, SW in the south, and 2nd Street, SW in the east. Interstate 395 (I-395) is located immediately east of 2nd Street, SW.

C Street, SW

C Street is classified as a collector roadway according to DDOT's roadway classification system. Collector roadways include intermediary streets that funnel vehicular traffic from local streets to arterial streets and back. C Street runs east-west, with one travel lane in each direction. The roadway is interrupted at 2nd Street, SW, by a small park. Beyond this, the roadway turns to the northeast towards the U.S. Capitol Building. Adjacent to FOB 8, metered parking is provided on both sides of the roadway most times of the day; however, the portion east of 3rd Street provides no parking. According to DDOT, the average weekday volume on the portion of the roadway adjacent to FOB 8 was 5,500 vehicles in 2007. The posted speed limit is 25 mph.

2nd Street, SW

As it passes the FOB 8 site, 2nd Street, SW is a one-way, two-lane roadway that runs southbound. The left hand lane is a left turn only lane that provides access to I-395, and the right lane is both a left turn and through lane, providing access to I-395. According to DDOT, 2nd Street is classified as a local roadway. Parking is provided along the west side of the roadway. The posted speed limit is 25 mph.

Truck access to FOB 8 is also provided via 2nd Street, SW. A guard station is located off of 2nd Street, near the intersection of 2nd and C Streets. A secure ramp sloping downward from east to west provides access for service and deliveries, as well as to secure parking below.

D Street, SW

D Street, SW borders the FOB 8 site to the south. This local roadway is one directional and provides one eastbound travel lane. The majority of its users are federal workers accessing the buildings in the immediate area. Parking is provided on both sides of the roadway. The posted speed limit is 25 mph.

3rd Street, SW

The District classifies 3rd Street, SW as a collector street. As it passes the western side of FOB 8, 3rd Street, SW provides two travel lanes in the north-south direction during off-peak times, and four travel lanes during peak hours (7:00 – 9:30 a.m. and 4:00 – 6:30 p.m.). Two lanes of parking are provided during off-peak hours when not in use for travel purposes. According to DDOT, the average weekday volume in 2007 on 3rd Street adjacent to FOB 8 was 6,600 vehicles. The posted speed limit is 25 mph.

Interstate 395

Located directly east of 2nd Street, SW, I-395 carries a large proportion of the daily traffic into and out of the District. A southbound on-ramp located at 2nd and D Streets, SW and an off-ramp located to the northeast on Washington Avenue accommodate travel to and from the FOB 8 site. According to DDOT, the average weekday volume on I-395 was 107,000 in 2007. The posted speed limit is 55 mph.

3.4.2 Parking

Parking is provided within and around the FOB 8 site in the form of metered parking spaces, permit parking, at-grade parking, and garage parking. A total of 38 metered parking spaces, and 35 permit spaces, are provided along the roadways that border FOB 8. On C Street, SW there are eight metered spaces on each side of the roadway. On the north side of the street, parking is not allowed between 7:00 and 9:30 a.m. On the south side of the street, parking is restricted between 4:00 and 6:30 p.m. On 2nd Street, SW there are eight metered spaces on the west side of the street. There are no peak hour restrictions. Parking is not allowed on the east side of 2nd Street. On D Street, SW, there are 18 parking spaces reserved for local government workers on the north side of the street. Similarly, there are 17 permit spaces on the south side of the street. There are seven metered

parking spaces on each of the east and west sides of 3rd Street, SW. The metered spaces permit public parking for two hour increments and follow the DC guidelines for accessible parking spaces.

An at-grade parking lot located on the C Street side of the building provides forty-eight automobile parking spaces and 15 motorbike parking spaces. These spaces served employees at FOB 8. Fifty-nine additional spaces are located in a below-grade garage within the building. The garage is accessible via an entrance on 2nd Street. A guard station monitors vehicles entering and exiting both lots. Due to the fact that FOB 8 is vacant, utilization of these lots is minimal.

Additional parking throughout the study area is available in the form of metered spaces along local roadways as well as several managed and privately operated parking garages. The closest garages to the FOB 8 site are located on Virginia Avenue and 4th Street, both managed and operated by Colonial Parking.

3.4.3 Public Transit

Metrorail

The FOB 8 site is accessed by the Federal Center SW Metrorail station, which is served by the Blue and Orange lines. The Federal Center SW station is located one block from FOB 8 along D Street, near the intersection of D and 2nd Streets, SW. Also served by the Blue and Orange lines, the Capitol South Metrorail Station is located approximately six blocks to the southeast of FOB 8. Although not accessible by either of these lines, Union Station, one of the region's most significant intermodal transportation terminals, is easily accessible via Metrorail (Red line) and Metrobus.

Metrobus

The second major component of the public transit system serving the study area is WMATA's Metrobus. Ward 2 is the focal point for the Metrobus, served by nearly 100 Metrobus routes. The P1 and P2 lines run along 3rd Street, SW adjacent to the site, while the P6 line has stops on C Street, SW adjacent to the site. Numerous lines run along Independence Avenue, one block north of the site, connecting this portion of Southwest with Capitol Hill to the east and the Mall and Pennsylvania Avenue to the west and north.

3.4.4 Pedestrian and Bicycle Circulation

Pedestrian activity in the vicinity of the FOB 8 site is generally light, with the majority of pedestrian consisting of federal workers in the surrounding office buildings. The highest levels of pedestrian activity occur during the a.m. and p.m. peak hours, and during lunch time. When FOB 8 was occupied, there were two sidewalks along the C Street side of the building, one that accessed the main entrance and one that bordered the roadway. The sidewalk closest to the building is currently closed, as the front of the building and the surface parking lot are contained within a fence. The outer sidewalk remains operational, but is difficult to navigate due to its changing widths. It is substantially narrower at the east end of the block due to the ramp to the below-grade parking area (Figure 3-24). Sidewalks on 2nd, D, and 3rd Streets, SW are relatively narrow, between 5 and 8 feet wide.

According to DDOT's Bicycle Map, the closest designated bicycle route to the FOB 8 site is along 4th Street. This signed bike route connects to its east-west path along I Street in the south and up north to the National Mall. There are no designated or signed bicycle paths along the roadways immediately surrounding the site.

Figure 3-24: Narrow sidewalk at the east end of C Street, SW with FOB 8 on the left
Source: EDAW, 2008

3.5 UTILITIES/INFRASTRUCTURE

3.5.1 Site Utilities

The following utility information is based on a 2006 utility plan compiled by A. Morton Thomas and Associates, Inc. (AMT).

Water

Water service is supplied to FOB 8 by the DC Water and Sewer Authority (WASA). Eight inch water lines are located below the roadways surrounding the site. Water lines cross the sidewalk on D Streets, entering the building at mid-block. Another line crosses the sidewalk and enters the building at the north end of the block along 3rd Street. An abandoned water line is also located near the southeast corner of the site, within the 2nd Street right-of-way (ROW).

Sanitary Sewer

WASA provides wastewater management for DC, including the collection, treatment, and discharge of effluent. Sewage is collected and transported for treatment at WASA's Blue Plains Wastewater Treatment Plant. Treated effluent is then discharged into the Potomac River.

A 24 inch (610 mm) sewer line runs below D Street, crossing the sidewalk and entering the building near the pedestrian tunnel to the Ford Building and again further east on D Street. Another 24 inch (610 mm) line is located within the 3rd Street ROW. A 15 inch (381 mm) sewer line runs south along 2nd Street, entering FOB 8 at the buildings northeast corner. In addition, several storm sewer manholes are located on the periphery of the site, along the curbline. The identified locations of the manholes include one on the southeast corner of the building along the curb, three along the 2nd Street curbline, one in the northeast corner, and two along 3rd Street near the front of the building.

Electric

Electric service is provided to the building by PEPCO. The main lines are located within the 3rd Street ROW and along the 3rd Street curb/gutter line. Smaller feeder lines run along the perimeter of the building and below adjacent sidewalks.

Steam

The FOB 8 building is heated by steam provided by the Heating Operation and Transmission District (Steam Distribution and Heating Plant), which is operated and owned by GSA. The main steam line serving the site is located within the 3rd Street ROW and enters the building from the west, crossing below the sidewalk near the pedestrian tunnel to the Switzer Building.

Communications

According to the survey conducted by AMT in 2006, fiber optic lines were not locatable but are believed to exist within a duct system along D Street, entering and leaving the south wall of the metro vent. Additional fiber optic lines were found to be located outside of the curbline along C Street. Telephone lines run below the sidewalk on D Street.

Other

Street lampposts are located along the perimeter of the site, three along D Street, two along 2nd Street, three along C Street, and two along 3rd Street. An additional six lampposts are located along the at-grade parking lot on C Street. Because the metro tunnel is located immediately to the south of the site, several metro vents are located along D Street.

3.5.2 Stormwater Management

Typical of the urban environment throughout the District, the natural stormwater drainage patterns of the site and within the general area have been altered as a result of urbanization. Stormwater within the area drains away from the building and is collected in storm drains and combined sewer lines located along the periphery of the site, as noted in the Utilities section. Combined sewer lines that convey both stormwater and sanitary sewage are located along the perimeter of the site.

Stormwater is treated at the Blue Plains Wastewater Treatment Plant. However, under extreme stormwater events, combined sewer overflows (CSOs) may be released directly into the Potomac River, impacting water quality. The governing body for stormwater management in DC is the Stormwater Management Section of the Department of Consumer and Regulatory Affairs.

3.5.3 Hazardous Materials

Due to the age of the building and prior uses, several environmental studies have been completed to assess potential hazardous substances at FOB 8. These studies include a *Phase I Environmental Site Assessment* (Phase 1 ESA) undertaken in 1998-1999, a *Final Environmental Hazards Report* completed in 2003, a *Chemical Decommissioning Report* completed in 2005, a *Fly Ash Contamination Sampling Report* finalized in 2007, and an *Environmental Conditions Report* released in 2008. Although the *Environmental Conditions Report* documented the presence of asbestos containing materials (ACMs), lead based paint, and PCBs (in electrical fixtures) in the building, it is unlikely that such substances are present outside of the structure. In addition, these substances are being remediated during the renovation process, a separate action from what is being analyzed in this EA. The 2007 sampling of fly ash at FOB 8 established the presence of dioxins and furans, Polynuclear Aromatic Hydrocarbons, and metals of interest above the limit of detection. This contamination is due to the prior operation of a biological waste incinerator system by the FDA. It is possible that these materials are present in the soil immediately surrounding the building, due to the ventilation of the system through a stack on the roof.

3.6 AIR QUALITY

In response to the Clean Air Act (CAA) of 1970 and the CAA Amendments of 1977 and 1990, the U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for criteria air pollutants including carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), particulate matter equal to or less than 10 microns in size (PM_{10}), and fine particulate matter equal to or less than 2.5 microns in size ($PM_{2.5}$). The NAAQS include primary standards designed to protect human health and secondary standards to protect public welfare.

Regions of the country that are currently not meeting the NAAQS are identified as "nonattainment" areas. These non-attainment areas are classified as "marginal", "moderate", "serious", "severe", or "extreme". The Metropolitan Washington air quality region, which includes Washington, DC and ten surrounding counties in Virginia and Maryland, is currently designated as moderate non-attainment for the federal eight-hour ozone standard and non-attainment for the fine particulate ($PM_{2.5}$) standard. The Washington DC metropolitan area is also located within an ozone transport region. The Metropolitan Washington Air Quality Committee (MWAQC), as the region's lead air quality planning agency, has undertaken planning efforts to bring the region into compliance with the NAAQS.

The EPA requires that non-attainment regions prepare attainment plans aimed at reducing ozone-causing emissions in order to reach compliance with the NAAQS. Federal agencies responsible for an action in a non-attainment area are required to determine if the action either conforms to the prepared regional attainment plan or is exempt from conformity. The EPA has determined that federal actions are exempt from conformity determinations where the total of all reasonably foreseeable direct and indirect emissions of non-attainment pollutants: (1) would be less than their specified emission rate thresholds, known as *de minimis* limits, and (2) would be less than 10 percent of the area's annual emission budget. The general conformity *de minimis* limits for ozone nonattainment areas inside an ozone transport region are 50 tons per year for volatile organic compounds (VOC) and 100 tons per year for nitrogen oxides (NOx). The *de minimis* limit for direct emissions of $PM_{2.5}$ is 100 tons per year.

3.7 NOISE LEVELS

Noise can be generally defined as unwanted or unwelcome sound. Noise levels are usually measured in decibels (dB), on a logarithmic scale, that are weighted to sounds perceivable by the human ear (A-weighted sound level (dBA)). A-weighted decibels account for the fact that the human ear is not equally sensitive to all frequencies. Noise levels are typically expressed as an average over a period of time (Leq) since noise sources may produce varying degrees of sound throughout the period of operation or occurrence.

Noise regulations in the District establish maximum permissible sound levels for an operation, activity, or noise source on a property, based on time of day and land use category (i.e., residential, commercial, and industrial). Areas that are zoned commercial, such as the project site, have a maximum allowable noise limit of 65 dBA (daytime) and 60 dBA (nighttime). There are exceptions to the maximum allowable noise levels in the DC noise regulations such as for construction activities and noise emitting from emergency vehicles. From 7:00 a.m. to 7:00 p.m. on any weekday, noise levels resulting from construction or demolition are limited to a maximum of 80 dBA.

The maximum allowable noise levels are designed to protect human activities or land uses that may be infringed upon by ambient noise. Certain land uses are considered to be noise-sensitive receptors, including residential dwellings, hotels, hospitals, nursing homes, educational facilities, and libraries. The National Museum of the American Indian (NMAI) would potentially be classified as a noise-sensitive receptor because it serves an educational function. Commercial and industrial land uses are generally not considered to be noise sensitive receptors.

Ambient noise levels at the project site and surrounding areas are primarily generated by transportation activity. The most prominent source of noise is the vehicular traffic on the roadways adjacent to the site. Levels of traffic congestion and mix of vehicle types on those adjacent streets corresponds with the volume of noise generated. Idling vehicles, such as WMATA buses, further contribute to the volume of noise. Because traffic is the largest source of noise in the study area, the peak noise period of the day is anticipated to be the peak hour traffic period. Those primarily affected by this traffic noise would be pedestrians on the sidewalks surrounding the site and visitors to the museums and the Mall one block to the north.

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4.0

ENVIRONMENTAL CONSEQUENCES

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4.0 ENVIRONMENTAL CONSEQUENCES

The following chapter assesses the impacts of the proposed action on each of the action alternatives and the No Action alternative. In the analysis, impacts are characterized by several factors including intensity, type, and duration. Definitions of these terms and related assumptions are provided below:

Intensity – The intensity of an impact describes the magnitude of change that the impact generates. For the majority of the resource areas, the intensity thresholds are as follows:

- *Negligible*: There would be no impact, or the impact does not result in a noticeable change in the resource;
- *Minor*: The impact would be slight, but detectable, resulting in a small but measurable change in the resource;
- *Moderate*: The impact would be readily apparent and/or easily detectable;
- *Major*: The impact would be widespread and would substantially alter the resource. A major adverse impact would be considered significant under NEPA.

For certain resources, such as visual resources, more specific thresholds are necessary. If applicable, these thresholds are outlined at the beginning of the resource's section.

Type – The impact type refers to whether it is adverse (negative) or beneficial (positive). Adverse impacts would potentially harm resources, while beneficial impacts would improve resource conditions. Within the analysis, impacts are assumed to be adverse unless identified as beneficial.

Duration – The duration of an impact identifies whether it occurs over a restricted period of time (short-term), or persists over a longer period (long-term). For the purposes of this analysis, it is assumed that short-term impacts would occur during the construction of the improvements, while long-term impacts would persist once the construction is complete. For the purposes of this analysis, impacts are assumed to be long-term unless identified otherwise.

In addition to the factors detailed above, impacts may be characterized as direct, indirect, or cumulative. A direct impact is caused by the action and occurs at the same time and place. An indirect impact is caused by the action, but occurs later in time, or farther removed in distance. A cumulative impact occurs when the proposed action is considered together with other past, ongoing, or planned actions.

4.1 CULTURAL RESOURCES

The White House Council on Environmental Quality (CEQ) regulations for implementing NEPA require an evaluation of impacts on historic resources as part of an Environmental Assessment (EA) or Environmental Impact Statement (EIS). Potential impacts to historic resources include direct and indirect impacts. The alteration, physical displacement, or demolition of a resource is a direct impact; changes in the use, operation or character of a resource can be either direct or indirect impact; and changes to the visual context are considered indirect impact.

In addition to CEQ regulations implementing NEPA, the National Historic Preservation Act of 1966 (NHPA), as amended, establishes standards for evaluating potential effects to historic resources. The NHPA defines "effect" as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register" (36 CFR 800.16) and requires that the lead agency, in consultation with the SHPO, determine whether the effect is adverse. According to the NHPA, an "adverse effect" occurs "when an undertaking may alter, directly or indirectly, any of the characteristics of the historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5).

In accordance with the Advisory Council on Historic Preservation (ACHP) regulations implementing Section 106 of the NHPA, effects on cultural resources are identified and evaluated by (1) determining the area of potential effects, (2) identifying cultural resources present in the area of potential effects that were either listed in, or eligible to be listed in, the National Register of Historic Places, (3) applying the criteria of adverse effect to affected resources, and (4) considering ways to avoid, minimize, or mitigate adverse effects.

As recommended by the CEQ, the Section 106 process is being undertaken concurrent with the environmental review process mandated by NEPA. GSA is the lead agency in the Section 106 process. Consultation will continue throughout the environmental review process.

4.1.1 Archaeological Resources

Alternative A: Preferred Alternative

Under the Preferred Alternative, construction of the perimeter security elements would require excavation at the edges of the block, between the sidewalk and the curbline on D, 2nd and 3rd Streets. The construction of the landscaped plaza may also disturb the sidewalk area along C Street, although the plaza itself is constructed above the parking garage. Due to the depth of the excavation and the fact that the area was previously disturbed during both the urban renewal efforts and the construction of FOB 8, it is unlikely that intact archaeological resources would be disturbed. Thus, impacts are anticipated to be negligible.

Mitigation Measures

- In the event that archaeological resources are discovered during ground disturbing activities, construction should stop while appropriate studies are completed.

Alternative B

Under Alternative B, construction of the perimeter security elements would require excavation at the edges of the block, between the sidewalk and the curbline on D and 2nd Streets, and between the sidewalk and the building on 3rd Street. The construction of the landscaped plaza may also disturb the sidewalk area along C Street, although the plaza itself is constructed above the parking garage. Due to the depth of the excavation and the fact that the area was previously disturbed during both the urban renewal efforts and the construction of FOB 8, it is unlikely that intact archaeological resources would be disturbed. Thus, impacts are anticipated to be negligible.

Mitigation Measures

- In the event that archaeological resources are discovered during ground disturbing activities, construction should stop while appropriate studies are completed.

Alternative C

Under Alternative C, construction of the perimeter security elements would require excavation between the sidewalk and the face of the building on 2nd, D and 3rd Streets. The construction of the landscaped plaza may also disturb the sidewalk area along C Street, although the plaza itself is constructed above the parking garage. Due to the depth of the excavation and the fact that

the area was previously disturbed during both the urban renewal efforts and the construction of FOB 8, it is unlikely that intact archaeological resources would be disturbed. Thus, impacts are anticipated to be negligible.

Mitigation Measures

- In the event that archaeological resources are discovered during ground disturbing activities, construction should stop while appropriate studies are completed.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, there would be negligible impacts on archaeological resources.

4.1.2 Historic Resources

Alternative A: Preferred Alternative

Under Alternative A, exterior improvements to the faces of the building would alter the appearance of FOB 8. The installation of new glazing and the widening of the window panels would have indirect visual impacts on adjacent historic properties including the Switzer Building, the Cohen Building, and the Humphrey Building. However, the design for the facades on FOB 8 would employ vertical bays as organizing features, and thus would be visually consistent with the modern designs of the adjacent Switzer and Cohen Buildings. Impacts to these adjacent structures would be negligible.

The new security pavilion would further alter the exterior appearance of the building, introducing a new element into the setback on the north face of the building. This would alter its relationship to the Switzer and Cohen Buildings, as each have similar unobstructed setbacks. While the new building facades and the security pavilion would be visible from the grounds of the U.S. Capitol, Bartholdi Fountain, and Botanic Gardens during the wintertime, they would not alter or obstruct reciprocal views between historic properties, and thus indirect impacts would be negligible.

The removal of surface parking and its replacement with a landscaped plaza would alter the use and appearance of the space between FOB 8 and C Street. Indirect impacts would be negligible.

The installation of perimeter security elements between the sidewalk and the curbline on D and 3rd Streets would form both physical and visual barriers between the building facades and these L'Enfant roadways, altering the continuity of the roadways and the historic spatial relationships that are important features of the L'Enfant Plan. Impacts on the L'Enfant Plan from the security elements would be minor to moderate and could result in an adverse effect under Section 106. The security features could also impact adjacent historic properties, including the Switzer Building, the Cohen Building, and the Humphrey Building. Impacts would be indirect and negligible to minor. Impacts to the L'Enfant Plan would not result from the curbline perimeter security on 2nd Street, as it is not considered to be a contributing street within the Plan.

Mitigation Measures

- To the extent possible, improvements to the building facades should be designed to be visually consistent with the modern designs of adjacent historic properties.
- To the extent possible, the physical features that would provide perimeter security should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the number of bollards required.
- Perimeter security elements, including bollards should be designed to reflect the architectural style of the building and surrounding area.

<u>Alternative B</u>

As under Alternative A, exterior improvements to the faces of the building under Alternative B would alter the appearance of FOB 8. The installation of new glazing and the widening of the window panels would have indirect visual impacts on adjacent historic properties including the Switzer Building, the Cohen Building, and the Humphrey Building. However, the design for the facades on FOB 8 would employ vertical bays as organizing features, and thus would be visually consistent with the modern designs of the adjacent Switzer and Cohen Buildings. Impacts to these adjacent structures would thus be negligible.

The new security pavilion would further alter the exterior appearance of the building, introducing a new element into the setback on the north face of the building. This would alter its relationship to the Switzer and Cohen Buildings, as each have similar unobstructed setbacks. While the new building facades and the security pavilion would be visible from the grounds of

the U.S. Capitol, Bartholdi Fountain, and Botanic Gardens during the wintertime, they would not alter or obstruct reciprocal views between historic properties, and thus indirect impacts would be negligible.

The removal of surface parking and its replacement with a landscaped plaza would alter the use and appearance of the space between FOB 8 and C Street. Indirect impacts would be negligible.

The installation of perimeter security elements between the sidewalk and the curbline on D Street would form both physical and visual barriers between the building facade and this L'Enfant roadway, altering the continuity of the roadway and the historic spatial relationships that are important features of the L'Enfant Plan. Impacts on the L'Enfant Plan from the security elements would be minor to moderate and could result in an adverse effect under Section 106. Impacts to the L'Enfant Plan would not result from the curbline perimeter security on 2nd Street, as it is not considered to be a contributing street within the Plan. The security features could also impact adjacent historic properties, including the Switzer Building, the Cohen Building, and the Humphrey Building. Impacts would be indirect and negligible to minor.

Mitigation Measures

- To the extent possible, improvements to the building facades should be designed to be visually consistent with the modern designs of adjacent historic properties.
- To the extent possible, the physical features that would provide perimeter security should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the number of bollards required.
- Perimeter security elements, including bollards should be designed to reflect the architectural style of the building and surrounding area.

<u>Alternative C</u>

As under Alternative A, exterior improvements to the faces of the building under Alternative C would alter the appearance of FOB 8. The installation of new glazing and the widening of the window panels would have indirect visual impacts on adjacent historic properties including the Switzer Building, the Cohen Building, and the Humphrey Building. However, the design for the facades on FOB 8 would employ vertical bays as organizing features, and thus would be visually consistent with the modern designs of the adjacent Switzer and Cohen Buildings. Impacts to these adjacent structures would thus be negligible.

The new security pavilion would further alter the exterior appearance of the building, introducing a new element into the setback on the north face of the building. This would alter its relationship to the Switzer and Cohen Buildings, as each have similar unobstructed setbacks. While the new building facades and the security pavilion would be visible from the grounds of the U.S. Capitol, Bartholdi Fountain, and Botanic Gardens during the wintertime, they would not alter or obstruct reciprocal views between historic properties, and thus impacts would be negligible.

The removal of surface parking and its replacement with a landscaped plaza would alter the use and appearance of the space between FOB 8 and C Street. Indirect impacts would be negligible.

The location of the perimeter security elements within the building yard in Alternative C would maintain the open relationship between the sidewalk and the roadway. Thus impacts to the L'Enfant Plan would be negligible.

Mitigation Measures

- To the extent possible, improvements to the building facades should be designed to be visually consistent with the modern designs of adjacent historic properties.
- To the extent possible, the physical features that would provide perimeter security should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the number of bollards required.
- Perimeter security elements, including bollards should be designed to reflect the architectural style of the building and surrounding area.

<u>No Action Alternative</u>

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, there would be negligible impacts to historic resources.

4.1.3 Visual Resources

The visual impact assessment for the proposed FOB 8 exterior improvements addresses potential changes to views and vistas that can be attributed to the proposed action. Impacts to views and vistas are determined based on an analysis of the existing quality of the view, the sensitivity of the view (such as important views from historic and cultural sites), and the anticipated relationship of the proposed design elements to the existing visual environment.

Visual impacts in the analysis presented below are described using the following thresholds:

- **Negligible impact** – The proposed alterations would not result in any visual changes, or the changes would not be noticeable.
- **Minor impact** – The proposed alterations would be visible, but would not interfere with views and would not change the character of the existing views.
- **Moderate impact** – The proposed alterations would be visible and would interfere with existing views, but would not change the character of the existing views.
- **Major impact** – The proposed alterations would be visible as a contrasting or dominant element that interferes with views and substantially changes the character of the existing views.
- **Beneficial impact** – The proposed alterations would improve a view or the visual appearance of an area.

<u>Alternative A: Preferred Alternative</u>

Views Along C Street, SW

Under Alternative A, the existing surface parking lot on the north face of the building would be replaced with a landscaped plaza. The plaza would combine grassy panels, seatwalls, tree-lined paths, and hardscaped areas. Bollards would be located across the two entry points to the plaza from the C Street sidewalk. The existing street trees would be replaced with a new line

of trees between the sidewalk and the curbline. The new building elevation and security pavilion would also be apparent in views along the C Street corridor.

Looking east along C Street, SW, the hardened seatwall, bus shelter, several bollards, and the treed plaza would dominate the view. The addition of new street trees would create a consistent green edge between the sidewalk and the roadway, framing views along the corridor. The removal of the fence and replacement with the landscaped plaza would offer more complete views of the north elevation of FOB 8 and would increase the feeling of openness.

Views east along the inner sidewalk, between the Switzer Building and the surface parking lot, would also be opened up with the construction of the new plaza in front of FOB 8. The existing high fence would be removed and a vista would be reestablished from the Switzer Building entrance east to FOB 8. While the security pavilion would extend into this view corridor, its transparent nature would ensure that it would not obstruct the viewshed. Views from northwest corner of the site towards the U.S. Capitol Building, Bartholdi Fountain, and the U.S. Botanic Garden would not be impacted.

Looking west from the grassy area across 2nd Street, the view would be framed by the new line of trees between the sidewalk and the curbline. The bollards and entrance drive would appear in the foreground of the view as dominant elements. The removal of the high fence and the installation of the landscaped plaza would open views along the corridor to the face of the building. The vertical bands of windows would appear consistent with the rectilinear organization of the Switzer and Cohen Buildings in the distance. While the security pavilion would be apparent in views west across the plaza, its heavy use of glass would make it appear somewhat transparent such that the viewshed would not be obstructed.

Overall, there would be minor to moderate adverse impacts to views along C Street from the construction of the security pavilion, with beneficial impacts resulting from the addition of new street trees and an open public plaza, and the removal of the existing fence and parking lot.

Views Along 2nd Street, SW

Although the façade improvements would be evident in views along 2nd Street, it would not interfere with these views or alter their character.

Under Alternative A, the perimeter security line would be placed between the sidewalk and the curbline. Potential security elements include hardened streetscape features, tree boxes, and fence panels, with bollards occurring at the southeast corner and at the entrance to the plaza. These features would be evident in views north or south along 2nd Street, visually dividing the pedestrian space from the roadway and differing from the open sidewalk design found on the opposite side of the street. The erection of scaffolding for the exterior improvements would require that the existing trees be replaced. The new line of trees would run consistently from the entrance to the plaza in the north, to the Metrorail vent near the corner of 2nd and D Streets, framing views along the corridor. Looking north along the sidewalk adjacent to FOB 8, a line of bollards would visually intrude into the space, breaking the open vista north. Views to the south along the sidewalk are already obstructed by bollards at the Ford House Office Building. Overall, the impacts to views on 2nd Street, SW would be minor to moderate.

Views Along D Street, SW

Although the renovated façade of FOB 8 would be evident in views along D Street, it would not interfere with these views or alter their character.

Under Alternative A, the perimeter security line would be placed between the sidewalk and the curbline. Potential security elements include hardened streetscape features, tree boxes, and fence panels, with bollards occurring at the corners and the entrance at mid-block. These features would be evident in views east and west along D Street, visually dividing the pedestrian space from the roadway. The erection of scaffolding for the exterior improvements to the building would require that the existing trees be replaced. The new line of trees would run consistently between the corners, framing views along the corridor. Overall, the impacts to views on D Street, SW would be moderate with beneficial impacts resulting from the addition of new street trees.

Views Along 3rd Street, SW

Although the renovated façade of FOB 8 would be evident in views along 3rd Street, it would not interfere with these views or alter their character.

Under Alternative A, the perimeter security line would be placed between the sidewalk and the curbline. Potential security elements include hardened streetscape features, tree boxes, and fence panels, with bollards occurring at the southwest corner and the entrance to the landscaped plaza. These features would be evident in views north and south along 3rd Street, visually

dividing the pedestrian space from the roadway and contrasting with the open sidewalk on the west side of the street. The erection of scaffolding for the exterior improvements to the building would require that the existing trees be replaced. The new line of trees would run consistently between the corners, framing views along the corridor. Looking north along the sidewalk adjacent to FOB 8, a line of bollards would visually intrude into the space, breaking the open vista north. Views to the south along the sidewalk are already obstructed by bollards at the Ford House Office Building. Overall, the impacts to views on 3rd Street, SW would be minor to moderate with beneficial impacts resulting from the addition of new street trees.

Mitigation Measures:

- To the extent possible, the physical features providing perimeter security at the curbline should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the visual impact of the improvements.
- The perimeter security elements should be designed to reflect the architectural style of the building.
- The conceptual design will be refined through coordination with review agencies, including CFA and NCPC.

<u>Alternative B</u>

Views Along C Street, SW

Under Alternative B, the existing surface parking lot on the north face of the building would be replaced with a landscaped plaza. The plaza would combine grassy panels, seatwalls, curved tree-lined paths, oval planters, and hardscaped areas. Bollards would be located across the entrance to the plaza from the C Street sidewalk, and on either side of seatwall planters at the east and west ends of the plaza walkways. The two existing street trees would be replaced with a new line of trees between the sidewalk and the curbline. The new building elevation and security pavilion would also be apparent in views along the C Street corridor.

Looking east along C Street, SW, the hardened seatwall, bus shelter, bollards, and the treed plaza would dominate the view. The addition of new street trees would create a consistent green edge between the sidewalk and the roadway, framing views along the corridor. The removal of the fence and replacement with the landscaped plaza would offer more complete views of the north elevation of FOB 8 and would increase the feeling of openness.

Views east along the inner sidewalk, between the Switzer Building and the surface parking lot, would also be opened up with the construction of the plaza. The existing high fence would be removed and a vista would be reestablished from the Switzer Building entrance east to FOB 8. While the security pavilion would extend into this view corridor, its height would be minimized and its transparent nature would ensure that the viewshed is not obstructed. Views from northwest corner of the site towards the U.S. Capitol Building, Bartholdi Fountain, and U.S. Botanic Garden would not be impacted.

Looking west from the grassy area across 2nd Street, the view would be framed by the new line of trees between the sidewalk and the curbline. The bollards and entrance drive would appear in the foreground of the view as dominant elements. The removal of the high fence and the installation of the landscaped plaza would open views along the corridor to the face of the building. The vertical bands of windows would appear consistent with the rectilinear organization of the Switzer and Cohen Buildings in the distance. While the security pavilion would be apparent in views west across the plaza, its heavy use of glass would make it appear somewhat transparent such that the viewshed would not be obstructed.

Overall, there would be minor to moderate adverse impacts to views along C Street from the construction of the security pavilion, with beneficial impacts resulting from the addition of new street trees and an open public plaza, and the removal of the existing fence and parking lot.

Views Along 2nd Street, SW

Although the renovated façade of FOB 8 would be evident in views along 2nd Street, it would not interfere with these views or alter their character.

Under Alternative B, the perimeter security line would be placed between the sidewalk and the curbline. Potential security elements include hardened streetscape features, tree boxes, and fence panels, with bollards occurring at the southeast corner and at the entrance to the plaza. These features would be evident in views north or south along 2nd Street, visually dividing the pedestrian space from the roadway, and differing from the open sidewalk design found on the opposite side of the street. The erection of scaffolding for the exterior renovation of the building would require that the existing trees be replaced. The new line of trees would run consistently from the entrance to the plaza in the north, to the Metrorail vent near the corner of 2nd and D Streets, framing views along the corridor. Looking north along the sidewalk adjacent to FOB 8, a line of bollards would visually intrude into the space, breaking the open vista north. Views to the south along the sidewalk are already obstructed by

bollards at the Ford House Office Building. Overall, the impacts to views on 2nd Street, SW would be minor to moderate with beneficial impacts resulting from the addition of new street trees.

Views Along D Street, SW

Although the renovated façade of FOB 8 would be evident in views along D Street, it would not interfere with these views or alter their character.

Under Alternative B, the perimeter security line would be placed between the sidewalk and the curbline. Potential security elements include hardened streetscape features, tree boxes, and fence panels, with bollards occurring at the corners and the entrance at mid-block. These features would be evident in views east and west along D Street, visually dividing the pedestrian space from the roadway. The erection of scaffolding for the exterior renovation of the building would require that the existing trees be replaced. The new line of trees would run consistently between the corners, framing views along the corridor. Looking west along the sidewalk adjacent to FOB 8, a line of bollards would visually intrude into the space, crossing the sidewalk near the corner of the building and breaking the open vista. Overall, the impacts to views on D Street, SW would be moderate with beneficial impacts resulting from the addition of new street trees.

Views Along 3rd Street, SW

Although the renovated façade of FOB 8 would be evident in views along 3rd Street, it would not interfere with these views or alter their character.

Under Alternative B, the existing street trees would remain on 3rd Street and a terrace wall would be constructed along the inside edge of the sidewalk, where a low granite curb is currently located. The terrace wall would be constructed of stone and 39” high. At the north end of the block, the oval planter and bollards would be evident at the edge of the view north or south along the sidewalk. The erection of scaffolding for the exterior renovation of the building would require that the existing trees be replaced. The new line of trees would run consistently between the corners, framing views along the corridor. Overall, impacts to views along 3rd Street would be minor with beneficial impacts resulting from the addition of new street trees.

Mitigation Measures

- To the extent possible, the physical features providing perimeter security at the curbline should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the visual impact of the improvements.
- The perimeter security elements should be designed to reflect the architectural style of the building.
- The conceptual design will be refined through coordination with review agencies, including CFA and NCPC.

Alternative C

Views Along C Street, SW

Under Alternative C, the existing surface parking lot on the north face of the building would be replaced with a landscaped plaza. The plaza would combine grassy panels, seatwalls, angled tree-lined paths, and hardscaped areas. Bollards would be located across the entrance to the plaza from the C Street sidewalk. The two existing street trees would be replaced with a new line of trees between the sidewalk and the curbline. The new building elevation and security pavilion would also be apparent in views along the C Street corridor.

Looking east along C Street, SW, the small plaza at the corner lined by hardened seatwalls and surrounded by treed parcels would appear in the foreground on the right side of the view. The bus shelter and trees would appear in the foreground on the left side of the view. The addition of new street trees would create a consistent green edge between the sidewalk and the roadway, framing views along the corridor. The removal of the fence and replacement with the landscaped plaza would allow more complete views of the north elevation of FOB 8 and would increase the feeling of openness.

Views east along the inner sidewalk, between the Switzer Building and the surface parking lot, would also be opened up with the construction of the plaza. The existing high fence would be removed and a vista would be reestablished from the Switzer Building entrance east to FOB 8. While the security pavilion would extend into this view corridor, its height would be minimized and its transparent nature would ensure that the viewshed is not obstructed. Views from northwest corner of the site towards the U.S. Capitol Building, Bartholdi Fountain, and U.S. Botanic Garden would not be impacted.

Looking west from the grassy area across 2nd Street, the view would be framed by the new line of trees between the sidewalk and the curbline. The bollards and entrance drive would appear in the foreground of the view as dominant elements. The removal of the high fence and the installation of the landscaped plaza would open views along the corridor to the face of the building. The vertical bands of windows would appear consistent with the rectilinear organization of the Switzer and Cohen Buildings in the distance. While the security pavilion would be apparent in views west across the plaza, its heavy use of glass would make it appear somewhat transparent such that the viewshed would not be obstructed.

Overall, there would be minor to moderate adverse impacts to views along C Street from the construction of the security pavilion, with beneficial impacts resulting from the addition of new street trees and an open public plaza, and the removal of the existing fence and parking lot.

Views Along 2nd Street, SW

Although the renovated façade of FOB 8 would be evident in views along 2nd Street, it would not interfere with these views or alter their character.

Under Alternative C, a terrace wall would be constructed along the inside edge of the sidewalk, where a low granite curb is currently located. The terrace wall would be constructed of stone and 39" high. Its placement within the building yard would maintain the open relationship between the street and sidewalk. The erection of scaffolding for the exterior renovation of the building would require that the existing trees be replaced. The new line of trees would run consistently from the entrance to the plaza in the north, to the Metrorail vent near the corner of 2nd and D Streets, framing views along the corridor. At the northern corner, security features associated with the sub-grade parking garage would be visible, but would not obstruct the view along the sidewalk. Overall, the impacts to views on 2nd Street, SW would be minor with beneficial impacts resulting from the addition of new street trees.

Views Along D Street, SW

Although the renovated façade of FOB 8 would be evident in views along D Street, it would not interfere with these views or alter their character.

Under Alternative C, a terrace wall would be built along the inside edge of the sidewalk. The terrace wall would be constructed of stone and 39" high. Its placement within the building yard would maintain the open relationship between the street and sidewalk. At the entrance at the center of the block, the terrace wall would break and a line of bollards would span the opening. While the bollards would be visible in views along D Street, they would not obstruct views along the sidewalk. The erection of scaffolding for the exterior renovation of the building would require that the existing trees along 3rd Street be replaced. The new line of trees would form a consistent green edge, framing views along the corridor. Overall, the impacts to views on D Street, SW would be minor with beneficial impacts resulting from the addition of new street trees.

Views Along 3rd Street, SW

Although the renovated façade of FOB 8 would be evident in views along 3rd Street, it would not interfere with these views or alter their character.

Under Alternative C, a terrace wall would be built along the inside edge of the sidewalk between the entrance and the edge of the landscaped plaza. The terrace wall would be constructed of stone and 39" high. Its placement within the building yard would maintain the open relationship between the street and sidewalk. The erection of scaffolding for the exterior renovation of the building would require that the existing trees along 3rd Street be replaced. The new line of trees would form a consistent green edge, framing views along the corridor. Overall, the impacts to views on 3rd Street, SW would be minor with beneficial impacts resulting from the addition of new street trees.

Mitigation Measures

- The perimeter security elements should be designed to reflect the architectural style of the building.
- The conceptual design will be refined through coordination with review agencies, including CFA and NCPC.

<u>No Action Alternative</u>

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. The surface parking and fence, which both mar the visual environment on the north face of the building, would remain.

4.2 SOCIO-ECONOMIC RESOURCES

4.2.1 Land Use

Alternatives A, B and C

The action alternatives would have a beneficial impact on land use due to the replacement of the surface parking lot on the north face of the building with a landscaped plaza. The plaza would offer a place for employees and other pedestrians to sit and relax, and would be an extension of the green space located to the north and east of site, including the future location of the American Veterans Disabled for Life Memorial.

The exterior improvements to the building, as well as the perimeter security features, are not anticipated to have any adverse impacts on land uses within the vicinity of the site.

No Action Alternative

Under the No Action Alternative, perimeter security and building improvements would not be completed at FOB 8. The surface parking on the north face of the building would remain and no public space would be added to the area. Thus, impacts to land use would be negligible.

4.2.2 Planning Policies

Alternative A: Preferred Alternative

Alternative A would comply with portions of the *Federal Elements* of the *Comprehensive Plan,* as it would potentially enhance the efficiency, productivity, and public image of the federal government through improving an existing facility in the vicinity of the U.S. Capitol Building. However, contrary to the Plan, Alternative A would result in the removal of existing street trees and would impact pedestrian flow due to the placement of bollards across sidewalks and at corners. Alternative A would also locate security features within public space. Finally, Alternative A would detract from the L'Enfant Plan by creating physical and visual barriers between the sidewalk and the roadway on D and 3rd Streets.

Alternative A would comply with portions of the *NCPC Security Plan* and the subsequent *Policies and Objectives*. The design would employ a range of streetscape elements, such as seatwalls and street furniture, hardened for security purposes. Regarding the installation of barriers in public space, the *Policies and Objectives* allow for barriers in public space if the distance from the face of the of the building to the outer edge of the building yard is less than 20', but also state that the placement of barriers in public space is discouraged and should be avoided. For two faces of the building (2nd and D Streets) the building yard is less than 20' and placement of security features, while discouraged, may still be allowed. Additionally, the alternative would impact pedestrian circulation for the area's employees and tourists. Finally, the *Policies and Objectives* discourage the placement of security elements at corners, as they inhibit pedestrian flow.

Alternative A would result in a beneficial impact and comply with the *National Capital Framework Plan*'s vision for the Southwest Rectangle as it would make the site a more desirable workplace through the removal of the surface parking lot and its replacement with a landscaped plaza.

Under Alternative A, the street trees on the site would be replaced with new trees. To comply with the Urban Forest Preservation Act of 2002, a Special Tree Removal Permit would be required for any trees with circumferences larger than 55". This permit will require coordination with the Urban Forestry Administration, under the DC Department of Transportation. Overall, impacts to planning policies would be moderate.

Mitigation Measures

- In keeping with NCPC *Security Plan* and *Policies and Objectives*, the form and materials of the proposed perimeter security elements should respond to FOB 8 and its surroundings.

<u>Alternative B</u>

Alternative B would comply with portions of the *Federal Elements* of the *Comprehensive Plan,* as it would potentially enhance the efficiency, productivity, and public image of the federal government through improving an existing facility in the vicinity of the U.S. Capitol Building. However, contrary to the Plan, Alternative B would result in the removal of existing street trees, and would impact pedestrian flow due to the placement of bollards across sidewalks and at corners. Alternative B would also locate security features within public space. Finally, Alternative B would detract from the L'Enfant Plan by creating physical and visual barriers between the sidewalk and the roadway on D Street.

Alternative B would comply with portions of the *NCPC Security Plan* and the subsequent *Policies and Objectives*. The design would employ a range of streetscape elements, such as seatwalls and street furniture, hardened for security purposes. Regarding the installation of barriers in public space, the *Policies and Objectives* allow for barriers in public space if the distance from the face of the of the building to the outer edge of the building yard is less than 20', but also state that the placement of barriers in public space is discouraged and should be avoided. For two faces of the building (2nd and D Streets) the building yard is less than 20' and placement of security features, while discouraged, may still be allowed. Additionally, the alternative would impact pedestrian circulation for the area's employees and tourists. Finally, the *Policies and Objectives* discourage the placement of security elements at corners, as they inhibit pedestrian flow.

Alternative A would result in a beneficial impact and comply with the *National Capital Framework Plan*'s vision for the Southwest Rectangle as it would make the site a more desirable workplace through the removal of the surface parking lot and its replacement with a landscaped plaza.

Under Alternative B, the existing street trees would be replaced with new trees. To comply with the Urban Forest Preservation Act of 2002, a Special Tree Removal Permit would be required for any trees with circumferences larger than 55". This permit will require coordination with the Urban Forestry Administration, under the DC Department of Transportation. Overall, impacts to planning policies would be minor.

Mitigation Measures

- In keeping with NCPC *Security Plan* and *Policies and Objectives*, the form and materials of the proposed perimeter security elements should respond to FOB 8 and its surroundings.

<u>Alternative C</u>

Alternative C would comply with portions of the *Federal Elements* of the *Comprehensive Plan*. However, contrary to the Plan, Alternative C would remove existing street trees. Alternative C would, however, seek to minimize impacts to the pedestrian routes by installing security features between the sidewalks and the building faces.

Alternative C would comply with portions of the NCPC *Security Plan* and the subsequent *Policies and Objectives*. The design would place perimeter security elements between the building face and the inside of the sidewalk, and would employ security measures such as terrace and seatwalls that respond to FOB 8 and its site. Alternative C would result in a beneficial impact and

comply with the *National Capital Framework Plan*'s vision for the Southwest Rectangle as it would make the site a more desirable workplace through the removal of the surface parking lot and its replacement with a landscaped plaza.

Under Alternative C, the existing street trees would be replaced. To comply with the Urban Forest Preservation Act of 2002, a Special Tree Removal Permit would be required for any trees with circumferences larger than 55". This permit will require coordination with the Urban Forestry Administration, under the DC Department of Transportation. Overall, impacts to planning policies would be negligible.

No Action Alternative

Under the No Action Alternative, perimeter security and building improvements would not be completed at FOB 8. As a result, the building would remain vacant, and thus would not comply with the intent of the Federal Workplace Element in the *Comprehensive Plan for the National Capital* that emphasizes locating the federal workforce to enhance the efficiency, productivity, and public image of the federal government and give emphasis to the District of Columbia as the seat of the national government. In addition, the plaza would not be improved and thus the site would not become a more desirable workplace, as recommended by the *Framework Plan*.

4.2.3 Public Space

Alternative A: Preferred Alternative

Alternative A would not comply with DDOT's objective of keeping perimeter security measures out of public space. Alternative A proposes to locate the security features set back two feet from the curb along 2nd, D, and 3rd Streets, maximizing the distance between security threats and the building. The security line would also be located outside of the property line on C Street, although it would be inside of the sidewalk. Specific scenarios where security features fall outside the property line include when the security line is integrated into seat walls and plinth walls, the landscaped elements, and the existing ramp wall. This configuration would achieve the highest level of security but would also require that DDOT grant a Public Space Permit. DDOT also requires that proposed security features do not block pedestrian flow. The bollards across the sidewalk and at the corners would hinder flow, especially during peak periods. This would be particularly problematic on 3rd Street, SW, where pedestrian flow is greatest due to the location of the Metro.

Alternative A does implement several suggestions included in the GSA publication *Achieving Great Federal Public Spaces: A Property Manager's Guide*. The inclusion of a new security pavilion along C Street, SW achieves the goal of creating federal spaces that are secure and welcoming. Further, the public plaza proposed along C Street, SW would provide a forum for tenant activity and public use through the inclusion of street furniture and green space. The plaza would also activate the streetscape along C Street, SW and improve conditions for pedestrians passing by. Overall, adverse impacts to public space would be moderate, with beneficial impacts resulting from the installation of the pedestrian plaza on C Street.

Mitigation Measures

- Coordinate with DDOT throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space.

Alternative B

Alternative B would not comply with DDOT's objective of keeping perimeter security measures out of public space as portions of the security line would be located outside of the property line. Portions of the security line, however, would be established in the building yard. Alternative B proposes to locate the security features along the curb on 2nd and D Streets, and outside the FOB 8 property line on 3rd and C Streets (however features on 3rd and C Streets would be installed within the building yard). This would require that DDOT grant a Public Space Permit. DDOT also dictates that proposed security features do not block pedestrian flow, however, Alternative B would hinder flow on 2nd and D Streets.

Alternative B does implement several suggestions included in the GSA publication *Achieving Great Federal Public Spaces: A Property Manager's Guide*. The inclusion of a new security pavilion along C Street, SW achieves the goal of creating federal spaces that are secure and welcoming. Further, the public plaza proposed along C Street, SW would provide a forum for tenant activity and public use through the inclusion of street furniture and green space. The plaza would also activate the streetscape along C Street, SW and improve conditions for pedestrians passing by. Overall, adverse impacts to public space would be minor to moderate, with beneficial impacts resulting from the installation of the pedestrian plaza on C Street.

Mitigation Measures

- Coordinate with DDOT throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space.

Alternative C

Although Alternative C would locate the security line inside the sidewalk on all of the streets surrounding FOB 8, the hardened terrace wall on 3rd Street would still occur within public space, since the existing planting bed extends beyond the property line. This would require that DDOT grant a Public Space Permit.

Alternative C implements several suggestions included in the GSA publication *Achieving Great Federal Public Spaces: A Property Manager's Guide*. The inclusion of a new security pavilion along C Street, SW achieves the goal of creating federal spaces that are secure and welcoming. Further, the public plaza proposed along C Street, SW would provide a forum for tenant activity and public use through the inclusion of street furniture and green space. The plaza would also activate the streetscape along C Street, SW and improve conditions for pedestrians passing by. Overall, impacts to public space would be negligible to minor, with beneficial impacts resulting from the installation of the pedestrian plaza on C Street.

Mitigation Measures

- Coordinate with DDOT throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space.

No Action Alternative

Under the No Action Alternative, perimeter security and building improvements would not be completed at FOB 8. The surface parking lot would remain and the area would not gain a public gathering space on the north side of FOB 8. Impacts would thus be negligible.

4.3 NATURAL RESOURCES

4.3.1 Vegetation

Alternatives A, B and C

Under the action alternatives, the existing street trees and other on-site vegetation would be removed. This would include eight trees along C Street, SW, five trees along D Street, SW, four trees along 2nd Street, SW, and 3 trees along 3rd Street, SW. The removal of existing trees, particularly the two large oaks on C Street, may require a Special Tree Removal Permit through the Urban Forestry Administration. New street trees would be installed, forming consistent green edges along each of the roadways, and trees and grassy areas would be added on the plaza. Along 2nd Street, the narrow space between the building yard and the curbline may constrain the use of shade trees. Overall, impacts to existing trees would be moderate, with positive impacts resulting from the increased number of street trees and the new landscaping on the plaza.

Mitigation Measures

- Coordinate with the Urban Forestry Administration and comply with the Urban Forestry Administration's Special Tree Removal Permit as necessary.
- Coordinate with DDOT regarding the placement of new trees in public space.

No Action Alternative

Under the No Action Alternative, perimeter security improvements would not be installed at FOB 8. The existing parking would remain on the north face of the building, and new street trees would not be added on the roadways bordering the site. Impacts would thus be negligible.

4.3.2 Water Resources

Alternatives A, B and C

Due to the absence of surface water on-site, impacts to water resources are not anticipated to result from the action alternatives. Preliminary mapping has indicated that FOB 8 may lie within the 100-year floodplain if updates are not made to

the District's flood management system. However, construction of the new levee system is anticipated to commence in 2009 and would result in FOB 8 not being located within the 100-year floodplain.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, there would be negligible impacts to water resources on the site or within the surrounding area.

4.4 TRANSPORTATION

4.4.1 Vehicular Circulation

Alternatives A, B and C

The movement of construction materials, equipment, and workers to FOB 8 would likely constrict roadways in the immediate area, on C Street, D Street, 2nd Street and 3rd Street, SW. Specific travel lanes that would be impacted are southbound traffic on 2nd Street, northbound traffic on 3rd Street, eastbound traffic on C Street and westbound traffic on D Street. In order to minimize disruptions to the on and off-ramps to I-395, construction should be phased such that 2nd, C, and D Streets are not obstructed simultaneously. Overall, construction-related impact would be short-term and moderate.

Once completed, the only impact to the area's traffic flow would result from the increased use of the sub-grade parking garage. Located at the north end of the block on 2nd Street, the garage provides 59 parking spaces and also has a loading dock. Once the building is operational, there is the potential for queuing due to the screening of vehicles. However, due to the small size of the garage, such queuing scenarios are anticipated to be rare. Thus, long-term impacts to vehicular circulation are anticipated to be negligible.

Mitigation Measures

- Minimize construction vehicle traffic and equipment during AM and PM peak hours.
- Coordinate construction schedules with nearby projects, including the American Veterans Disabled for Life Memorial, to minimize impacts on area roadways.
- Schedule deliveries during off-peak travel periods to reduce the potential for vehicle queuing at the entrance to parking garage.
- Coordinate with District of Columbia Fire and Emergency Services throughout the design process to ensure that emergency vehicle access is maintained.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, impacts to vehicular circulation would be negligible.

4.4.2 Parking

Alternatives A, B and C

The installation of the proposed security measures would temporarily impact the on-street parking availability. It is likely, however, that the only parking spaces that would be impacted during the construction phase are spaces located directly adjacent to FOB 8. Specifically, the parking spaces that would be affected are located on the south side of C Street, the west side of 2nd Street, the north side of D Street, and east side of 3rd Street. Short-term impacts to parking would be minor.

After the construction, the largest impact to parking facilities within the vicinity of FOB 8 would be conversion of the surface lot located on the north face of the building along C Street. This lot offers space for 48 parking automobile parking spaces and 15 motorbike spaces. The parking lot, however, was never open for public use. The below-grade parking lot would also be utilized; however, it provides only 59 spaces. Overall, long-term impacts to parking would be minor.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, impacts to parking would be negligible.

4.4.3 Public Transportation

Alternatives A, B and C

Exterior improvements to FOB 8 would not result in changes to the public transportation routes or services in the area. A new bus shelter would be constructed along C Street, SW at the northwest corner of the site, providing a covered waiting area for bus riders. Overall, impacts would be negligible.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, impacts to public transportation would be negligible.

4.4.4 Pedestrian and Bicycle Circulation

Alternative A: Preferred Alternative

Construction activities at FOB 8 would cause temporary sidewalk closures and thus disruptions to pedestrian circulation on the roadways that border the site. These disruptions could be minimized by appropriate signage. Short-term impacts to pedestrian circulation would be moderate.

Under Alternative A, a combination of bollards, hardened street furniture, fences, tree panels, and hardened seatwalls would be installed on the sidewalk set back two feet from the curb on 2nd, D and 3rd Streets. The bollards would be 39" high, 11" in diameter, and spaced 4'-11" apart on center. Pedestrians would be required to cross through the bollards at the southeast and southwest corners of the site, and when entering the landscaped plaza to the north end. In addition, bollards would cross the sidewalk at the north end of the block on 2nd and 3rd Streets, SW. These features would disrupt pedestrian flow, particularly on 3rd Street, where pedestrian volumes are the highest due to the Metrorail station at 3rd and D Streets.

In addition to impacting pedestrian flow, the hardened streetscape features would change the open relationships between the roadways and the sidewalks, altering the pedestrian experience. However, beneficial impacts to the pedestrian experience would result from the inclusion of a public plaza and increased green space proposed along C Street, SW.

Overall, impacts to pedestrian circulation would be moderate, with beneficial impacts to pedestrian experience resulting from the installation of a public plaza on C Street. No adverse impacts are anticipated to bicycle circulation as the closest bicycle route is along 4th Street, SW.

Mitigation Measures

- During construction of the security elements, employ appropriate signage and flagging to ensure pedestrian safety.
- Ensure that the final design complies with ADA accessibility requirements.

- Ensure that the final design facilitates circulation to and from the future American Veterans Disabled for Life Memorial east of the site.

Alternative B

Construction activities at FOB 8 would cause temporary sidewalk closures and thus disruptions to pedestrian circulation on the roadways that border the site. These disruptions could be minimized by appropriate signage. Short-term impacts to pedestrian circulation would be moderate.

Under Alternative B, a combination of bollards, hardened street furniture, tree panels, fences, and hardened seatwalls would be installed on sidewalk set back two feet from the curb on 2nd and D Streets. The bollards would be 39" high, 11" in diameter, and spaced 4'-11" apart on center. Pedestrians would be required to cross through the bollards at the corner of 2nd and D Streets, and when entering the landscaped plaza at the north end of the site. In addition, bollards would cross the sidewalk at the north end of the block on 2nd Street and at the west end of the block on D Street. These features would disrupt pedestrian flow on 2nd and D Streets, but would not alter pedestrian flow along 3rd Street, to or from the Metrorail.

The hardened streetscape features located between the curbline and the street on D and 2nd Streets would change the open relationships between the roadways and the sidewalks, altering the pedestrian experience. However, beneficial impacts to the pedestrian experience would result from the inclusion of a public plaza and increased green space proposed along C Street.

Overall, impacts to pedestrian circulation would be minor to moderate, with beneficial impacts to pedestrian experience from the installation of a public plaza on C Street. No adverse impacts are anticipated to bicycle circulation as the closest bicycle route is along 4th Street.

Mitigation Measures

- During construction of the security elements, employ appropriate signage and flagging to ensure pedestrian safety.
- Ensure that the final design complies with ADA accessibility requirements.
- Ensure that the final design facilitates circulation to and from the future American Veterans Disabled for Life Memorial east of the site.

Alternative C

Construction activities at FOB 8 would cause temporary sidewalk closures and thus disruptions to pedestrian circulation on the roadways that border the site. These disruptions could be minimized by appropriate signage. Short-term impacts to pedestrian circulation would be moderate.

Under Alternative C, a combination of bollards, terrace walls, and hardened seatwalls would be installed between the sidewalks and building on 2nd, 3rd, and D Streets, SW. Only those pedestrians entering the building or crossing the plaza would be impacted by the security elements, and thus impacts would be negligible. There would be beneficial impacts to pedestrian experience resulting from the inclusion of a public plaza and increased green space proposed along C Street, SW. No adverse impacts are anticipated to bicycle circulation, as the closest bicycle route is along 4th Street, SW.

Mitigation Measures

- During construction of the security elements, employ appropriate signage and flagging to minimize impacts to pedestrian safety.
- Ensure that the final design complies with ADA accessibility requirements.
- Ensure that the final design facilitates circulation to and from the future American Veterans Disabled for Life Memorial east of the site.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, impacts to pedestrian or bicycle circulation would be negligible.

4.5 UTILITIES AND INFRASTRUCTURE

4.5.1 Utilities

Alternative A: Preferred Alternative

On 2nd Street, SW, construction of security features, the public plaza, and the security pavilion could potentially disturb a 15" (381 mm) sewer line that enters the building at the northeast corner. To ensure that the sewer line is not compromised, the DC Water and Sewer Authority (WASA) might require that a preconstruction survey be completed. Other utilities that may be disturbed include two lampposts.

On 3rd Street, SW, construction of the security features could potentially disturb several utility lines including a water line, a sewer line, and an electric line. Additionally, the construction of the public plaza and security pavilion could disrupt the water line. The water line runs below the sidewalk, between the curb and the face of the building, and enters the building at the north end of the block. The 24" (610 mm) sewer line is located within the 3rd Street ROW. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction survey be completed. The electric line runs along the 3rd Street, SW curb/gutter line and enters the building at several points. PEPCO would need to be contacted to ensure this line is kept intact. Other utilities that could be impacted along 3rd Street, SW are the steam line, which enters the building near the tunnel to the Switzer Building, and two lampposts.

On C Street, SW, construction of the security features, public plaza and security pavilion could potentially disturb fiber optics lines that run along the curbline and a series of lampposts. The latter will be replaced according to District standards.

On D Street, SW, the construction of security features could potentially disturb several utility lines including a water line, telephone lines, fiber optics lines, and sewer lines. The water line crosses the sidewalk and enters the building mid-block. The 24" (610 mm) sewer lines enter the building near the pedestrian tunnel to the Ford Building and again further east on D Street, SW. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction survey be completed. Other utilities that could be impacted include several Metro vents and three street lampposts. Overall, impacts would be short-term and moderate.

Mitigation Measures

- Coordinate with DC WASA to determine if a preconstruction survey is necessary.
- Coordinate with PEPCO to ensure all electrical lines remain intact and are safe to work around.
- Street lighting would be provided in accordance with District standards.

Alternative B

On 2nd Street, SW, construction of the security features, public plaza and security pavilion could potentially disturb a 15" (381 mm) sewer line that enters the building at the northeast corner. To ensure that the sewer line is not compromised, the DC Water and Sewer Authority (WASA) might require that a preconstruction survey be completed. Other utilities that may be disturbed include two lampposts.

On C Street, SW, construction of the security features, public plaza and security pavilion could potentially disturb fiber optics lines that run along the curbline and several lampposts. Other utilities that may be disturbed are the three lampposts along the street and six lampposts that would be removed or relocated for the public plaza. New lighting would be installed per District standards.

On 3rd Street, SW, construction of the security features could potentially disturb a water line and an electric line. Additionally, the construction of the public plaza and security pavilion could disrupt the water line. The water line runs below the sidewalk, between the curb and the face of the building, and enters the building at the north end of the block. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction survey be completed. The electric line runs along the 3rd Street, SW curb/gutter line and enters the building at several points. PEPCO would need to be contacted to ensure this line is kept intact. Other utilities that could be impacted along 3rd Street, SW are the steam line, which enters the building near the tunnel to the Switzer Building, and two lampposts.

On D Street, SW, construction of security features could potentially disturb several utility lines including a water line, telephone lines, fiber optics lines, and sewer lines. The water line crosses the sidewalk and enters the building mid-block. The 24" (610 mm) sewer lines enter the building near the pedestrian tunnel to the Ford Building and again further east on D Street, SW. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction

survey be completed. Other utilities that could be impacted include several Metro vents and three street lampposts. Overall, impacts would be short-term and moderate.

Mitigation Measures

- Coordinate with DC WASA to determine if a preconstruction survey is necessary.
- Coordinate with PEPCO to ensure all electrical lines remain intact and are safe to work around.
- Street lighting would be provided in accordance with District standards.

Alternative C

On 2nd Street, SW, construction of the security features, public plaza and security pavilion could potentially disturb a 15" (381 mm) sewer line that enters the building at the northeast corner. To ensure that the sewer line is not compromised, the DC Water and Sewer Authority (WASA) might require that a preconstruction survey be completed. Other utilities that may be disturbed include two lamposts, however, new lighting will be installed per District standards.

On C Street, SW, construction of security features, public plaza and security pavilion could potentially disturb fiber optics lines that run along the curbline. Other utilities that may be disturbed are the three lampposts along the street and six lampposts that would be removed or relocated for the public plaza.

On 3rd Street, SW, construction of the security features could potentially disturb a water line and an electric line. Additionally, the construction of the public plaza and security pavilion could disrupt the water line. The water line runs below the sidewalk, between the curb and the face of the building, and enters the building at the north end of the block. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction survey be completed. The electric line runs along the 3rd Street, SW curb/gutter line and enters the building at several points. PEPCO would need to be contacted to ensure this line is kept intact. Other utilities that could be impacted along 3rd Street, SW are the steam line, which enters the building near the tunnel to the Switzer Building, and two lampposts.

On D Street, SW, construction of security features could potentially disturb several utility lines including a water line, telephone lines, fiber optics lines, and sewer lines. The water line crosses the sidewalk and enters the building mid-block. The 24" (610 mm) sewer lines enter the building near the pedestrian tunnel to the Ford Building and again further east on D

Street, SW. To ensure the water and sewer lines are not compromised, the DC WASA might require that a preconstruction survey be completed. Overall, impacts to utilities would be short-term and moderate.

Mitigation Measures

- Coordinate with DC WASA to determine if a preconstruction survey is necessary.
- Coordinate with PEPCO to ensure all electrical lines remain intact and are safe to work around.
- Street lighting would be provided in accordance with District standards.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Impacts to utility systems would thus be negligible.

4.5.2 Stormwater Management

Alternatives A, B and C

FOB 8 is located within a highly urbanized portion of downtown Washington, DC. As such, stormwater management is achieved through a system of storm drains and combined sewer lines located along the periphery of the building. There could be minor short-term construction-related impacts to stormwater due to increased sediment flows, however, this would be minimized by implementing best management practices.

Each of the action alternatives would see the creation of a public plaza along C Street, SW and the introduction of green space to the study area. This would result in a positive impact to stormwater management because the green space, although built over a parking garage, would capture some stormwater runoff before it leaves the site. Overall, short-term construction-related impacts would be minor, while long-term impacts to stormwater management would be positive.

Mitigation Measures

- Employ stormwater best management practices during construction to minimize sediment loads in stormwater runoff.

No Action Alternative

Under the No Action Alternative, exterior improvement would not be undertaken at FOB 8. Thus, impacts to the stormwater management system would be negligible.

4.5.3 Hazardous Waste/Contamination

Alternatives A, B and C

The action alternatives do not propose to introduce any new hazardous waste materials or contamination to the site. The roof replacement would be undertaken such that any fly ash is captured and disposed of properly. Thus, impacts would be negligible.

Mitigation Measures

- Due to prior uses of the building and the potential for fly ash to have migrated to the soils surrounding the site, soil testing should be undertaken prior to excavation.

No Action Alternative

Under the No Action Alternative, exterior improvements would not be undertaken at FOB 8. Thus, impacts to hazardous materials would be negligible.

4.6 AIR QUALITY

Alternatives A, B and C

The main source for potential air quality impacts that would result from Alternatives A, B, and C would take place during the construction period. These emissions would come from three sources: (1) construction equipment emissions; (2) fugitive dust from soil excavation and site disturbance; (3) emissions from construction worker vehicles commuting to the site. Emissions produced during construction would vary daily depending on the equipment and type of activity, however, due to the limited construction proposed, project-generated emissions would be expected to be below *de minimus* levels. Thus, the project would be exempt from an air conformity determination. Short-term impacts would be minor and long-term impacts would be negligible.

Mitigation:

- Appropriate best management practices should be implemented during construction to reduce, minimize, or eliminate construction vehicle and equipment emissions and fugitive dust.

No Action Alternative

Under the No Action Alternative, perimeter security and building improvements would not be completed at FOB 8. Thus, impacts to air quality on the site or within the surrounding area would be negligible.

4.7 NOISE LEVELS

Alternatives A, B and C

The District limits weekday construction and demolition noise to 80 dBA Leq from 7 a.m. to 7 p.m., unless a variance is granted. Given the scope of the construction activities, it is unlikely that noise levels would reach this threshold. The movement of heavy trucks could also generate noise in the vicinity of the site. Visitors to the museums north of the site, could be impacted by construction-related noise impacts, as construction of both the proposed action and American Veterans Disabled for Life Memorial may coincide. Overall, short-term construction-related impacts would be minor to moderate. Once completed, long-term impacts to noise levels would be negligible.

Mitigation Measures

- Employ appropriate best management practices to control noise at its source.

No Action Alternative

Under the No Action Alternative, perimeter security and building improvements would not be completed at FOB 8. Thus, impacts to noise levels would be negligible.

4.8 CUMULATIVE IMPACTS

Cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. The following planned or ongoing projects were considered in the cumulative impacts analysis for FOB 8:

American Veterans Disabled for Life Memorial: The American Veterans Disabled for Life Memorial is planned for a two-acre landscaped parcel just northeast of FOB 8. Bordered by 2nd Street, SW, Washington Avenue, and ramps to I-395, the memorial will include a reflecting pool, treed walkways, and a landscaped area, all with commanding views of the U.S. Capitol Building.

Third and C Streets, SW Urban Design Guide: Prepared by GSA and available in draft form, the Urban Design Guide seeks to unify the streetscape within a four-block area that includes: FOB 8, the Mary C. Switzer Building, Wilbur J. Cohen Building, and the Hubert H. Humphrey Building. The Guide addresses such issues as perimeter security, streetscape elements, and proposed landscape features. For one of the projects in the 3rd and C Street area, GSA is proposing to convert C Street, SW, between 3rd and 4th Streets, to one lane in either direction.

Dwight D. Eisenhower Memorial: The Eisenhower Memorial is planned for a site northwest of FOB 8 at the intersection of Maryland and Independence Avenues. The memorial, currently in the design phase, will celebrate Eisenhower's commitment to freedom, the Constitution, democracy, economic progress, and international peace.

Perimeter Security Projects within the Nation's Capital: Numerous perimeter security projects are planned, have been approved, or have been recently completed within Washington, DC (Figure 4-1). In addition, several roadways have been closed for security purposes. These security improvements are widespread, including those immediately around FOB 8, on Capitol Hill northeast of FOB 8, on the Mall, and in the downtown. Immediately around FOB 8, permanent perimeter security measures have been proposed at the Switzer and Cohen Buildings, and permanent measures have been installed at the Humphrey Building and the Ford House Office Building. On Capitol Hill, permanent perimeter security is widespread including around the Capitol complex, the Library of Congress buildings, and the Rayburn House Office Building, among others. North of FOB 8, along the Mall, permanent perimeter security has been installed or approved for installation at the majority of the Smithsonian museums including NMAI, the National Air and Space Museum, the Hirshhorn Museum, the Smithsonian Castle, the National Museum of Natural History, and the National Museum of American History. Permanent perimeter security

improvements have been proposed or temporary measures have been installed at a number of buildings between the 3rd and C Street area, and the Tidal Basin further west. Across the Mall, temporary perimeter security measures have been installed around buildings within the Federal Triangle, and permanent security measures are being considered for several of these buildings, including the headquarters of the U.S. Department of Commerce and the National Archives. Perimeter security measures have also been proposed, approved, or constructed at a number of buildings east and west of Federal Triangle.

4.8.1 Historic Resources

The installation of perimeter security elements, particularly along the curbline, has the potential to generate cumulative impacts to historic resources, when considered together with the other perimeter security projects that have been recently completed or are planned within D.C. Over time, the installation of perimeter security at the curbline at FOB 8 could increase the likelihood that property owners install perimeter security, since its placement outside of the sidewalk increases the potential threat to adjacent buildings. This could generate minor adverse cumulative impacts to adjacent historic structures located within the APE, including the Switzer and Cohen Buildings. In addition, there could be cumulative impacts to the L'Enfant Plan. The relationship between the roadways and building yards are important features of the plan. Perimeter security placed between the sidewalk and the roadway interrupt these relationships, potentially creating a moderate adverse impact on the L'Enfant Plan.

4.8.2 Visual Resources

Drafted by GSA, *the 3rd and C Street Urban Design Guide* seeks to establish common approaches to streetscape alignment and treatment within a four block area that includes FOB 8, and the Switzer, Cohen, and Humphrey Buildings. The improvement of FOB 8, if undertaken in accordance with the principles established by the guide, could create beneficial cumulative impacts to visual resources within the four-block area through the installation of street trees and common streetscape elements.

The installation of perimeter security at FOB 8, when considered together with other constructed or planned perimeter security within the area of visual influence, has the potential to adversely impact visual resources. Impacts would be greater if security is placed along the curbline, as it would interrupt the open visual relationship between the sidewalks and the roadways. Further, security elements crossing the sidewalk would interrupt continuous views from the walkways. Overall,

cumulative impacts to visual resources could be moderate adverse if security is placed at the curbline and minor adverse if placed within the building yard.

4.8.3 Land Use

The proposed exterior improvements to FOB 8 have the potential to create cumulative impacts to land use. Two memorials, the Eisenhower Memorial and the American Veterans Disabled for Life Memorial, are planned for underutilized sites in the immediate vicinity of FOB 8. The creation of the public plaza at FOB 8, when considered together with the memorials, would have a beneficial cumulative impact on land use in the Southwest portion of Washington, DC.

4.8.4 Public Space

The proposed exterior improvements to FOB 8 have the potential to create cumulative impacts to public space. Two memorials, the Eisenhower Memorial and the American Veterans Disabled for Life Memorial, are planned for underutilized sites in the immediate vicinity of FOB 8. The creation of the public plaza at FOB 8, when considered together with the memorials, would have a beneficial cumulative impact on public space in the area (generally within two blocks of site). However, the installation of perimeter security elements along the curbline, when considered together with other perimeter security projects completed or planned within Washington, DC, could adversely impact public space. The potential widespread installation of security elements within DC, if located outside of building property lines, would interrupt the continuity of the area sidewalks, creating a moderate adverse impact to public space.

4.8.5 Pedestrian Circulation

Alternative A would impede pedestrian flow along 3rd Street, and all of the action alternatives would impact pedestrian flow at the plaza. Visitors to the American Veterans Disabled for Life Memorial could potentially employ these paths to access the metro. This, coupled with the potential increase in visitation to the area due to the memorials, would have a moderate adverse cumulative impact on pedestrian circulation. Further, the placement of perimeter security elements within the sidewalks at FOB 8 could contribute to a moderate adverse cumulative impact to the pedestrian circulation network in the area (generally within two blocks of the site), if adjacent buildings also install perimeter security outside of the building yards. These elements would hinder pedestrian flow, particularly during peak periods.

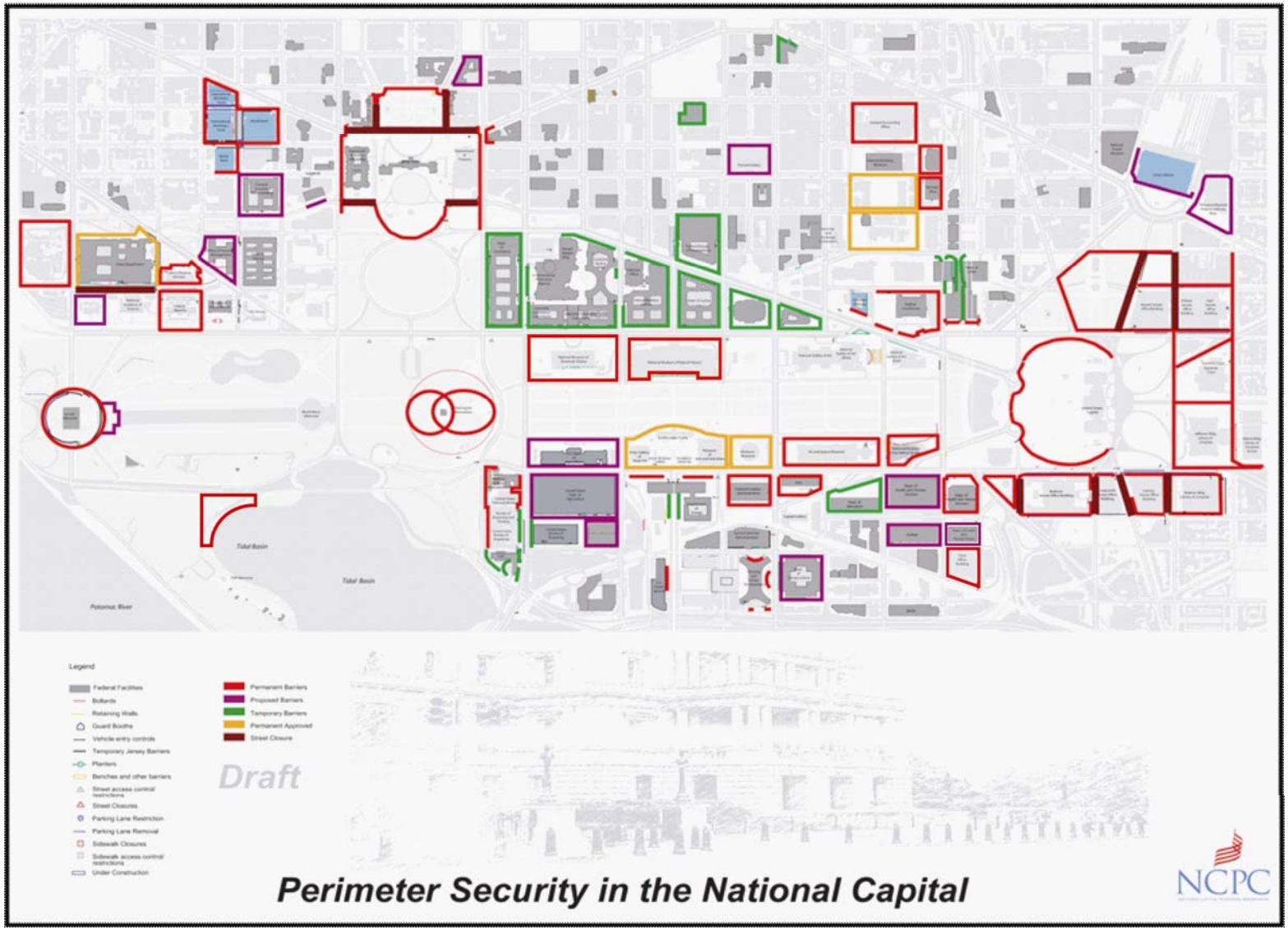

Figure 4-1: District-wide Perimeter Security Projects
Source: NCPC, 2007; EDAW, 2009 (Revisions)

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APPENDIX

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Mr. Bill R. Arguto
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Martin Luther King, Jr. Memorial Library
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Southwest Neighborhood Library
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