

**FEDERAL OFFICE BUILDING 8**  
**BUILDING MODERNIZATION**  
(excluding site improvements and perimeter security)

200 C Street, SW  
Washington, DC

Finding of No Significant Impact

DEC 28 2009

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary and final building plans for the modernization of Federal Office Building 8 (FOB8), located at 200 C Street SW in Washington DC, as shown on NCPC Map File No. 1.72(38.00) 41669125, and the December 2009 environmental assessment prepared by the General Services Administration (GSA), and the comments that GSA received, and have determined that the building plans as proposed will not have a significant impact on the human environment. This finding applies only to the building modernization and does not include any site improvements or perimeter security.

Proposed Action

GSA proposes to renovate Federal Office Building 8 (FOB8), the former Food and Drug Administration laboratory building, from laboratory space into modern office space. In September of 2007, GSA submitted concept site and building plans for FOB8. At its October 2007 meeting, the Commission commented favorably on the revised concept for the renovation of the existing building with the exception of the proposed security screening pavilion and perimeter security elements. The Commission commented unfavorably on the perimeter security design because the perimeter barrier system intruded into the public right-of-way on all four sides of the building. The Commission also commented unfavorably on the security screening pavilion proposed for the building yard because the pavilion addition pushed the front of the building 48 feet further north and therefore pushed the perimeter security line into public space within the building yard.

Since that time, GSA has been in the process of revising the site, building and perimeter security plans to address the concerns of NCPC and other stakeholders. GSA submitted preliminary and final building plans for the modernization of the building for Commission consideration in January 2010. The submission does not include site improvements and the proposed perimeter security, which will be submitted to the Commission for consideration at a later date.

With regard to the building modernization, the proposed action includes three major architectural efforts; opening up the facades of the building to allow light; the insertion of two atria down through the full height of the building; and extending the mass of the building out into the plaza in the form of the entry pavilion. The renovation also provides improved building efficiencies and blast resistant materials throughout the building.

The security pavilion form was developed to satisfy several aesthetic and technical objectives. These include designing a security screening element that is detached from the main building, is transparent, minimizes impact on public space, and is viewed as a sculptural element. The security pavilion has been reduced in size from the submission in 2007. The overall massing of the pavilion has been reduced by approximately 25%. This includes a reduction in the overall height from 44'-10" to 30'9". The pavilion footprint was reduced approximately 5%. The reduced pavilion is approximately 1,700 square feet. It still projects approximately 41'6" into the public space within the building yard.

GSA received comments on the draft environmental assessment from nine organizations/agencies. There were only two comments that pertained to the building modernization. These included suggestions for increasing energy efficiency and a reminder that the glass pavilion will need fire protection. GSA adequately addressed both comments. The remaining comments pertain to the site and perimeter security elements of the environmental assessment.

#### Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

#### Potential impacts

The EA analyzes four alternatives for the building modernization, site improvements, and perimeter security. GSA released the final EA in December 2009. With regard to the building modernization (excluding site and perimeter security improvements) the EA determined the following:

"Exterior improvements to the faces of the building would alter the appearance of FOB8. 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 FOB8 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.

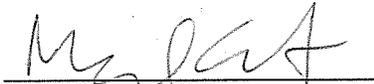
The new security pavilion would further alter the exterior appearance of the building, introducing a new element into the setback on the north face of the building. This would alter its relationship to the Switzer and Cohen Buildings, as each have similar unobstructed setbacks. While the new building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

Potential impacts on historic resources are considered through the Section 106 process of the National Historic Preservation Act (NHPA). GSA and the District of Columbia State Historic Preservation Office found that Federal Office Building 8 does not meet the criteria for eligibility for the National Register of Historic Places and that the modernization will have no adverse affect on historic resources.

The DC SHPO and the Commission staff note that this concurrence of no effect for the alteration and modernization of the building itself does not take into account the full scope of the undertaking because it makes no mention of the possible effect of the site improvements and security elements on the L’Enfant Plan. GSA, the DC SHPO, and the Advisory Council on Historic Preservation are in the process of drafting a Memorandum of Agreement (MOA) to outline measures that will minimize, mitigate and avoid adverse effects of proposed site and perimeter security elements on the L’Enfant Plan.

GSA issued a Finding of No Significant Impact (FONSI) for the building modernization on December 11, 2009. NCPC staff has also reviewed the EA and concurs with this finding.

Applying the standards, factors, and analysis here, acting under delegated authority from the Commission, I have determined that the EA identifies no significant impacts of the proposed project for the building modernization (not including site improvements and perimeter security) and that construction will not significantly affect the human environment.

  
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Marcel C. Acosta  
Executive Director