



Environmental Assessment for Security Enhancements USMC Commandant's House

US Marine Barracks — Washington, DC
April 2010



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Prepared for
Department of the Navy
US Marine Corps

in accordance with
Marine Corps Order P5090.2A2

pursuant to
National Environmental
Policy Act Section 102(2)(C)

Environmental Assessment

for

Security Enhancements at the USMC Commandant's House US Marine Barracks Washington, DC

April 2010

Abstract

This environmental assessment (EA) identifies and evaluates the potential impacts on the human environment of constructing a new fence system and curb-side bollards to improve perimeter security at the US Marine Corps (USMC) Commandant's House on G Street, SE, in Washington, DC. The current fence does not provide adequate protection against pedestrian intruders and potential vehicular attacks. The proposed action would have no significant adverse impacts on the human environment. The USMC Commandant's House and the Main Post of the US Marine Barracks, of which the house is a part, are listed on the National Register of Historic Places and they are collectively designated a National Historic Landmark. Potential adverse effects to these historic resources, and to the surrounding National Register-listed Capitol Hill Historic District, have been avoided or mitigated through the Section 106 consultation and design review process. Preparation of an environmental impact statement is not required.

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Executive Summary

This Environmental Assessment (EA) evaluates the impacts on the human environment that would result from implementing proposed upgrades to enhance perimeter security at the US Marine Corps (USMC) Commandant's House (Quarters 6) at the Main Post of the US Marine Barracks (Barracks) in Washington, DC. The EA has been prepared pursuant to Section 102 (2) (c) of the National Environmental Policy Act (NEPA) (42 USC 4331 et seq.), the regulations issued by the President's Council on Environmental Quality (CEQ) for implementing the procedural provisions of NEPA (40 CFR 1500-1508), and Marine Corps Order P5090.2A2.

E.1 Proposed Action

The proposed action consists of the following main elements:

- Construction of a new, extended, and reinforced fence system (including two permanent guard booths) on the G Street, SE side of the Barracks, in front of the Commandant's House.
- Controlled curb-side parking on the south side of G Street, in front of the Commandant's House.
- Installation of bollards within the fence line at the northeast and northwest corners of the property (10 bollards at each location) and along the inside edge of the tree boxes (to be enlarged) at each end of the block (two bollards each).

The purpose and need for the proposed action is to make the US Marine Corps Commandant's House at the Marine Barracks more secure, in keeping with the security needs of the Commandant, one of the highest-ranking military officials in the nation, and current Department of Defense (DoD) anti-terrorism/force protection (AT/FP) standards and requirements. The current configuration of the house front does not provide an adequate level of security. Only a low fence separates the house's front yard from the public sidewalk. Installed more than 100 years ago, the fence was not intended for, and is not capable of, preventing physical intrusion. It also offers no protection

against potential vehicular threats, which are a serious risk since the house faces a public street.

E.2 Alternatives

The EA evaluates the impacts of two alternatives: No Action and the Proposed Action Alternative.

In the preliminary stages of planning, various alternatives to meet the US Marine Corps' purpose and need were developed and evaluated through an iterative process that combined and balanced consideration of (1) the need to achieve adequate security standards and (2) the need to maintain the historic and aesthetic integrity of the house - which is listed on the National Register of Historic Places, is part of a designated National Historic Landmark, and is considered one of the most significant historic properties in the District of Columbia - as well as to minimize any long-term disruption to the neighborhood.

The Marine Corps worked with a wide range of agencies and organizations that have an interest in the preservation of the historic and aesthetic integrity of the site to evaluate and refine design concepts as they were developed. These agencies and organizations include the DC Historic Preservation Office (HPO), the National Capital Planning Commission (NCPC), the Commission of Fine Arts (CFA), the National Park Service (NPS), the Capitol Hill Restoration Society (CHRS), and Advisory Neighborhood Commission (ANC) 6B.

In the course of this process, a number of potential concepts and solutions were considered and eventually dismissed because the consulting parties found that they did not achieve the right balance between security needs and preservation concerns. The proposed action is the ultimate result of this process. Because of the iterative manner in which it was developed, it is the only alternative that has been found by all parties to achieve the appropriate balance.

E.3 Impacts of the Proposed Action

Implementation of the proposed action would result in a small, positive impact on land use, as areas that are currently part of the brick sidewalk on either side of the Commandant's House would be turned into landscaped gardens, enhancing the visual quality of the area.

Consultation with the relevant planning agencies, including NCPC, the DC HPO, and the DC Department of Transportation (DDOT) has ensured that the proposed action is consistent with the relevant planning goals and policies and current design guidelines for security improvements in Washington, DC.

In the short term, construction activities would result in additional vehicle trips to and from the site; curbside parking along the southern side of G Street, SE, may be temporarily prohibited; all or parts of the sidewalk may be temporarily closed. Given the limited scale and duration of the proposed construction activities, these impacts would be minor.

In the long term, the proposed action would not affect vehicular or pedestrian traffic. Implementation of the proposed controlled parking measure would reduce the number of publicly-available parking spots along G Street, SE between 8th and 9th Streets, SE by approximately seven. However, these spaces would remain available to local residents upon obtaining a permit from DDOT, to USMC personnel working at or visiting the Barracks, and to visitors to the Commandant's House, all of whom may be expected to already use parking space on this stretch of G Street or nearby. The establishment of a planted garden at the east end of the block, in an area currently used for vehicle parking by Barracks personnel, may result in these few vehicles (about half a dozen) seeking parking on the streets and, therefore, in a slight increase in the demand for local parking. However, this impact would be small, affecting only a few vehicles. It would not create a significant parking shortage in the neighborhood.

The proposed action would have no long-term impacts on air quality. In the short term, it would have some minor construction-related adverse impacts: fugitive dust would be generated by some construction operations, but water could be used to minimize the amount of dust becoming airborne. Additional emissions of air pollutants would result from the use of diesel-powered construction equipment and the movement of trucks and vehicles. This increase would be minor and cease when construction activities are complete. The District of Columbia is a

nonattainment area for ozone and particulate matter 2.5. A General Conformity Rule applicability analysis was conducted as part of this EA. Annual emissions would not exceed the applicable *de minimis* levels. Therefore, air quality impacts would be minimal and a formal conformity determination is not required.

The Commandant's House, the US Marine Barracks Historic District, the Capitol Hill Historic District, and the L'Enfant Plan for Washington DC are National Register-listed architectural resources that are adjacent to or encompass the area of potential effect of the proposed action. In addition, the Commandant's House and the US Marine Barracks Historic District are, collectively, a National Historic Landmark (NHL).

To ensure that the proposed action does not result in an adverse effect to these protected architectural resources, the Marine Corps has designed the proposed enhancements consistent, to the maximum extent possible, with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR Part 68) and in consultation with the following agencies and organizations, which were identified as consulting parties for the purposes of Section 106 consultation: the DC HPO; NCPC; the Commission of Fine Arts (CFA); the National Park Service (NPS); the Advisory Council on Historic Preservation; Advisory Neighborhood Commission (ANC) 6B; and the Capitol Hill Restoration Society.

The proposed action is the result of an iterative consultation and review process through which alternatives that the consulting parties thought would have adversely affected the integrity of the Commandant's House were progressively eliminated or mitigated. Through the process, significant changes were made to the proposed design: for instance, the project originally envisioned a new fence that would have been 7 feet 6 inches in height; eventually, the height was reduced to the proposed 4 feet 8 inches, minimizing visual impacts. The reuse of the existing fence to create two new enclosed planted spaces and the construction of a decorative fence atop the wall along 8th Street, SE, were also adopted as mitigation measures during the consultation process. Another significant change was the almost complete elimination of the row of bollards once proposed to be installed on the sidewalk in front of the house and their replacement by controlled curb-side parking. Sensitive, unobtrusive design for the proposed guard booths also contributed to minimizing any adverse effects.

On February 25, 2010, following this process, which began in spring 2008, the DC HPO issued a positive recommendation for the Historic Preservation Review Board. Therefore, the Marine Corps has concluded that implementation of the proposed action would not result in an adverse effect to the Commandant's House; nor, consequently, would it result in an adverse effect to the US Marine Barracks Historic District, the NHL, Capitol Hill Historic District, or the L'Enfant Plan.

Extensive disturbance has lowered the potential for intact archaeological deposits in much of the Barracks property. Implementation of the proposed action would result in soil disturbance in a narrow area currently occupied by the Commandant's House's existing fence line and surrounding sidewalk, a site that has been disturbed by the construction of the existing structures. Therefore, the proposed action is not expected to affect any archaeological resources.

Any hazardous materials or waste required or generated by construction activities would be handled with all necessary care to prevent spills and inadvertent contamination of stormwater runoff. Because the existing fence may contain lead-based paint, all due precautions would be taken when relocating it to avoid the release of paint fragments into the environment. If the fence is repainted, the Marine Corps would consider removing and properly disposing of any layers of lead-based paint that may be present if it may be done without damaging the fence.

The proposed action would have no effect on demographic or economic conditions. It would not raise Environmental Justice issues under Executive Order (EO) 12898 nor is it expected to have a disproportionate adverse effect on children, protected under EO 13045. Securing the construction site against unauthorized access would minimize any risk to children that may walk by the house on their way to nearby Tyler Elementary School.

In the long term, the proposed action would have no effect on noise. In the short term, construction-related noise would not exceed that typically generated by small-scale construction sites. Short-term noise impacts would be insignificant.

The proposed action has no potential to adversely affect any natural resources. The Marine Barracks is a densely-developed site within a long-established urban area. Most of the property is built or paved, and the only open areas consist of maintained grounds and ornamental lawns, shrubs, and trees. The

establishment and maintenance of new planted areas on both sides of the Commandant's House would increase the amount of vegetated, pervious surface in the District of Columbia by a small amount, a small positive impact.

E.4 Conclusion

Based on the above findings, the US Marine Corps has concluded that the proposed action would have no significant adverse effects on the human environment. Therefore, an environmental impact statement is not needed and will not be prepared.

Table of Contents

<i>Chapter</i>	<i>Page</i>
1 Purpose and Need	1-1
1.1 Background.....	1-1
1.1.1 The Marine Barracks.....	1-1
1.1.2 The Commandant's House.....	1-2
1.2 Purpose and Need.....	1-3
1.3 The NEPA Process.....	1-4
2 Proposed Action and Alternatives	2-1
2.1 Description of the Proposed Action.....	2-1
2.1.1 New Fence System.....	2-1
2.1.2 Controlled Parking and Bollards.....	2-2
2.2 Alternatives to the Proposed Action.....	2-3
2.2.1 Alternative Development.....	2-3
2.2.2 Alternatives Considered but Dismissed.....	2-4
2.2.2.1 New Front Yard Fence Without Bollards (Concept A).....	2-4
2.2.2.2 Modified Front Yard Fence with Bollards (Concept B).....	2-4
2.2.2.3 Modified Front Yard Fence with Bollards (Concept B').....	2-4
2.2.2.4 Bollards Only (Concept C).....	2-5
2.2.2.5 Bollards and Planters (Concept C')....	2-5
2.2.2.6 New Front Yard Fence with Side Gardens and Bollards (Concept D).....	2-5
2.2.2.7 Combination of Bollards and Shrubbery.....	2-6
2.2.2.8 Close G Street.....	2-6
2.2.2.9 Relocate USMC Commandant's Residence..	2-6
2.2.3 No Action Alternative.....	2-6
2.3 Resources Not Considered in This EA.....	2-7

3 Affected Environment 3-1

3.1 Land Use.....3-1

3.2 Relevant Plans and Design Guidelines.....3-2

 3.2.1 Comprehensive Plan for the National Capital .3-2

 3.2.1.1 Federal Elements.....3-2

 3.2.1.2 District Elements.....3-3

 3.2.2 Planning for Security Improvements3-6

 3.2.2.1 National Capital Urban Design
and Security Plan.....3-7

 3.2.2.2 Designing and Testing of Perimeter
Security Elements.....3-7

 3.2.3 2001 Master Plan Update – Marine Barracks
8th and I Streets, Southeast,
Washington, DC3-8

3.3 Transportation.....3-8

3.4 Air Quality.....3-9

 3.4.1 National Ambient Air Quality Standards....3-9

 3.4.2 National Ambient Air Quality Standard
Attainment Status.....3-9

 3.4.3 Local Ambient Air Quality.....3-10

 3.4.4 State Implementation Plan.....3-11

 3.4.5 Clean Air Act Conformity.....3-12

3.5 Cultural Resources.....3-13

 3.5.1 Historic Overview.....3-13

 3.5.2 Architectural Resources.....3-15

 3.5.2.1 The USMC Commandant’s House.....3-15

 3.5.2.2 US Marine Barracks Historic District.3-15

 3.5.2.3 Capitol Hill Historic District.....3-16

 3.5.2.4 L’Enfant’s Plan.....3-16

3.6 Hazardous Materials and Waste.....3-17

4 Environmental Consequences 4-1

4.1 Land Use4-1

 4.1.1 No Action Alternative.....4-1

 4.1.2 Proposed Action Alternative.....4-1

4.2 Relevant Plans and Design Guidelines.....4-1

 4.2.1 No Action Alternative.....4-1

 4.2.2 Proposed Action Alternative.....4-2

4.3 Transportation.....4-2

 4.3.1 No Action Alternative.....4-2

 4.3.2 Proposed Action Alternative.....4-2

4.4 Air Quality4-4

 4.4.1 No Action Alternative.....4-4

 4.4.2 Proposed Action Alternative.....4-4

 4.4.2.1 Construction-Related Emissions.....4-4

4.4.2.2	Clean Air Act Conformity.....	4-4
4.4.2.3	Conformity Applicability Determination.....	4-5
4.5	Cultural Resources.....	4-6
4.5.1	No Action Alternative.....	4-8
4.5.2	Proposed Action Alternative.....	4-8
4.6	Hazardous Materials and Waste.....	4-11
4.6.1	No Action Alternative.....	4-11
4.6.2	Proposed Action Alternative.....	4-11
4.7	Cumulative Impacts.....	4-11
4.8	Conclusion.....	4-12
5	References	5-1
6	Preparers	6-1

Appendix A: Section 106 Documentation

Appendix B: General Conformity Rule Analysis

List of Tables

<i>Table</i>	<i>Page</i>
3-1 National Ambient Air Quality Standards.....	3-10
3-2 Local Ambient Air Quality.....	3-11
4-1 Total Estimated Annual Emission Levels.....	4-5
4-2 Criteria of Adverse Effects.....	4-7
4-3 Integrity Aspects that Could Be Affected by the Proposed Action.....	4-9

List of Figures

<i>Figure</i>	<i>Following Page</i>
1-1 Location of US Marine Barracks.....	1-2
1-2 Main Post and Commandant's House.....	1-2
1-3 USMC Commandant's House: Existing Elevation.....	1-2
2-1a Proposed Action - Elevation.....	2-2
2-1b Proposed Action - Site Plan.....	2-2
2-1c Proposed Action- Landscape Plan.....	2-2
2-1d Proposed Action - Sections.....	2-2
2-1e Proposed Action - Photo-rendering: G Street And 8 th Street, SE	2-2
2-2a New Front Yard Fence No Bollards (Concept A).....	2-4
2-2b Modified Front Yard Fence with Bollards (Concept B).....	2-4
2-2c Modified Front Yard Fence with Bollards (Concept B').....	2-6
2-2d Bollards Only (Concept C).....	2-6
2-2e Bollards and Planters (Concept C').....	2-6
2-2f New Front Yard Fence with Side Gardens and Bollards (Concept D).....	2-6
4-1 Area of Potential Effect.....	4-8

Acronyms and Abbreviations

ANC	Advisory Neighborhood Commission
AT/FP	Anti-Terrorism and Force Protection
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CEQ	Council on Environmental Quality
CFA	Commission of Fine Arts
CFR	Code of Federal Regulations
CHRS	Capitol Hill Restoration Society
CO	Carbon Monoxide
DC	District of Columbia
DDOT	District of Columbia Department of Transportation
DoD	Department of Defense
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
FONSI	Finding of No Significant Impact
GCR	General Conformity Rule
HPO	Historic Preservation Office
ICRMP	Integrated Cultural Resources Management Plan
MCI	Marine Corps Institute
NAAQS	National Ambient Air Quality Standard
NAVFAC	Naval Facilities Engineering Command
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxide
NPS	National Park Service
O ₃	Ozone
PM _{2.5}	Particulate Matter less than 2.5 micrometers
PM ₁₀	Particulate Matter less than 10 micrometers
ppm	Part per Million
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TBD	To Be Determined
tpy	Ton per Year
USEPA	United States Environmental Protection Agency
USMC	US Marine Corps
VOC	Volatile Organic Compound
µg/m ³	Microgram per Cubic Meter

1. Purpose and Need

This Environmental Assessment (EA) evaluates the impacts on the human environment that would result from implementing proposed upgrades to enhance perimeter security at the US Marine Corps (USMC) Commandant's House (Quarters 6) at the Main Post of the US Marine Barracks in Washington, DC. The proposed enhancements would consist of the construction of a new fence system, including two permanent guard booths, and associated measures such as controlled curb-side parking and the installation of metal bollards, primarily inside the fence line. The EA has been prepared pursuant to Section 102 (2) (c) of the National Environmental Policy Act (NEPA) (42 USC 4331 et seq.), the regulations issued by the President's Council on Environmental Quality (CEQ) for implementing the procedural provisions of NEPA (40 CFR 1500-1508), and Marine Corps Order P5090.2A2.

1.1 Background

1.1.1 The Marine Barracks

The US Marine Barracks (Barracks) consist of four separate sites in southeast (SE) Washington, D.C. (Figure 1-1): the Main Post, at 8th and I Streets, SE; the Annex, at 7th and L Streets, SE; the Marine Corps Institute (MCI), located at the Washington Navy Yard; and the Motor Pool, at Naval Station Anacostia. The Commandant's House is located on the north side of the Main Post, facing G Street, SE.

The mission of the Marine Barracks is to provide a light infantry battalion for operations, security missions, and ceremonies. The Barracks are home to the US Marine Band, known as the "President's Own" and the US Marine Drum and Bugle Corps, known as the "Commandant's Own." The Barracks fulfill a highly ceremonial role for the White House and the Commandant of the Marine Corps.

The historic Main Post, about 3.6 acres in size, occupies the equivalent of two city blocks between 8th Street, SE to the west; 9th Street, SE, to the east; I Street, SE, to the south; and G Street, SE, to the north. In 1971, a parcel of land south of I

Street, SE, was added to the Main Post, bringing its size to about 4.7 acres; that parcel is occupied by Building 20, Bachelor Enlisted Quarters, constructed in 1975. Henceforth, for the purposes of this EA, the terms "Marine Barracks," "Barracks," "Main Post," and "Post" refer to the historic Main Post only, exclusive of Building 20.

The Marine Barracks: A Summary History

The Marine Barracks served as the US Marine Corps Headquarters from 1801 to 1901 and is the Corps' oldest continually active post. The site of the Barracks was selected by President Thomas Jefferson and Lieutenant Colonel Commandant Burrows. The currently occupied site was chosen because it lies near the Navy Yard and is within easy marching distance of the US Capitol. Since 1805, the Marine Barracks have been the residence of every USMC Commandant. The first layout of the site was designed by George Hadfield. The Commandant's residence is the only remnant of the original site. In 1902, the barracks were redesigned by the firm of Hornblower and Marshall and the other extant buildings date from that period. The Main Post (Square 927) was entered in the National Register of Historic Places in 1972; in 1976, it was designated a National Historic Landmark.

The historic Main Post consists of a quadrangle of buildings facing inward onto a central parade ground that is used for drill exercises and public performances during the parade season. The site, which has existed in one form or another since the early 1800s, is listed on the National Register of Historic Places and is a designated National Historic Landmark (NHL), a designation reserved for properties that have special historic significance on a national level. The special

significance of the Barracks site arises from its status as the oldest Marine Corps post in the United States and the residence of the Marine Corps Commandant without interruption since 1805.

1.1.2 The Commandant's House

The Commandant's House, situated on the north end of the Main Post, facing G Street, SE (Figures 1-2 and 1-3), is separately listed on the National Register and is part, with the Barracks, of a National Historic Landmark. It is the only building remaining from the early 19th-century Barracks; in spite of several enlargements in the 19th and 20th centuries, the original building outlines and floor plan are still distinguishable. The house is a 2 and 1/2-story Federal style townhouse with elaborate dormer windows projecting from a mansard roof. The front façade features an arched entrance and double-hung sash windows on the first and second stories. Visually, the house's residential function and painted brick exterior walls contrast with the military severity and red-brick construction of the rest of the Post. The only major federal building that was not burned by the British during the War of 1812 and continuously

Location of US Marine Barracks



- | | |
|--|---|
|  Interstate |  Local Road |
|  Highway |  Water Body |
|  Major Road |  Military Installation |

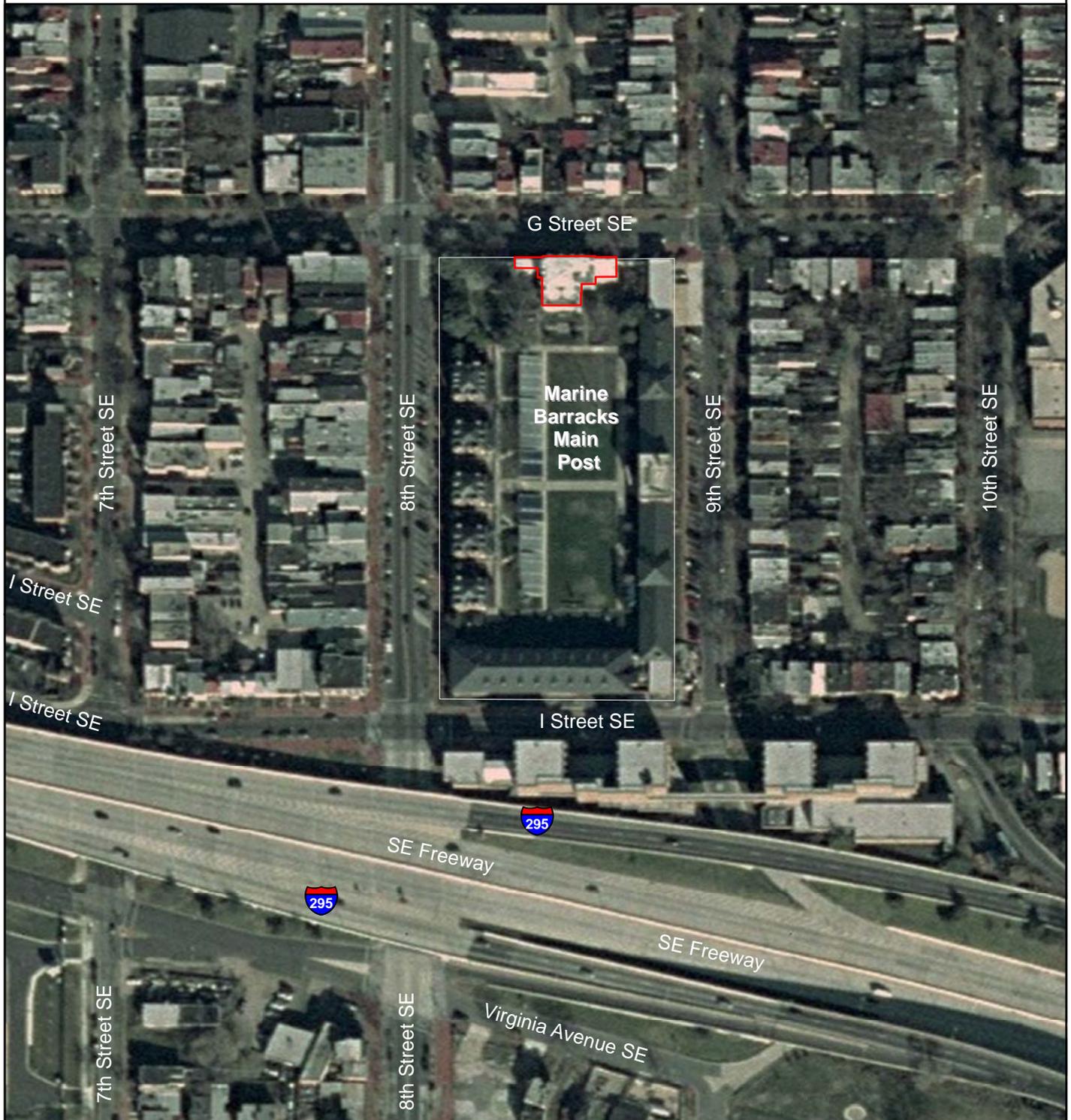
Figure 1-1

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Main Post and Commandant's House



-  Commandant's House (Quarters 6)
-  Main Post



Figure 1-2

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USMC Commandant's House - Existing Elevation



EXISTING ELEVATION

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occupied by the Commandant of the Marine Corps since its construction, the house is considered one of the most historically significant structures in Washington, DC and is a source of great pride among the Marines.

The Main Post is surrounded by a two-foot thick, ten-foot tall perimeter wall. However, the wall connects to the sides of the Commandant's House and offers no protection to the front of the house facing G Street, SE. Instead, the house's small front yard is separated from the public sidewalk by a three-foot three-inch tall cast iron fence that has been in place for more than 100 years. The fence, which is approximately 121 feet in length, sits 21 feet north of the house's front door. From the fence to G Street, there is approximately 12 feet of brick paver sidewalk. To the east and west of the house, the public sidewalk extends all the way to the perimeter wall. A row of a half-dozen red maples (*Acer rubrum*) extends along the outer edge of the sidewalk, between 8th and 9th Streets, SE. Guards are generally posted outside the house and a small, temporary guard station is located approximately 20 feet east of the house.

1.2 Purpose and Need

The purpose and need for the proposed action is to make the US Marine Corps Commandant's House at the Marine Barracks more secure, in keeping with the security needs of the Commandant, one of the highest-ranking military officials in the nation, and current Department of Defense (DoD) anti-terrorism/force protection (AT/FP) standards and requirements.

The USMC Commandant is the highest-ranking officer of the USMC and a member of the Joint Chiefs of Staff (JCS). As such, the Commandant's residence is considered a high security risk. Additionally, the Commandant routinely hosts US and foreign dignitaries and officials at the house, reinforcing the need for appropriate security at all times.

The current configuration of the G Street side of the Commandant's House does not provide an adequate level of security. As indicated above, only a low fence separates the house's front yard from the public sidewalk. Installed more than 100 years ago, the fence was not intended for, and is not capable of, preventing physical intrusion. The historic character of the Barracks and surrounding neighborhood, coupled with the commercial revitalization of the 8th Street, SE corridor, have been bringing increasing numbers of visitors to

the area, making it difficult for the guards on duty to effectively monitor the approaches to the house. As a result, cases of unknown individuals stepping over the low fence and even entering the house before they could be stopped have been documented. The possibility of such incidents happening again is unacceptable and must be eliminated.

Additionally, the existing fence offers no protection against potential vehicular threats, which are a serious risk since the house faces a public street from which it is separated only by a 12-foot wide sidewalk and a widely spread line of medium-size urban trees. The current situation is inconsistent with the DoD's policy to "protect DoD personnel, their families, installations, facilities, information, and other material resources from terrorist acts" (DoD Instruction 2000.16, Section 4.1). A recent security evaluation of the property conducted by the DoD found that it does not meet the applicable AT/FP standards and is not secure. While due consideration must be given to the Commandant's House's character as a historic property of extraordinary significance in an urban environment, the US Marine Corps must make all possible efforts to remedy the lack of adequate perimeter security.

1.3 The NEPA Process

NEPA provides for the consideration of environmental issues in federal agency planning and decision-making. Under NEPA, federal agencies must prepare an environmental impact statement (EIS) or an EA for any major federal action, except those actions that are determined to be "categorically excluded." An EIS is prepared for those Federal actions that may significantly affect the quality of the human environment. An EA is a concise public document that serves to provide sufficient evidence and analysis for determining whether to prepare an EIS. The EA includes brief discussions of the following:

- The need for the proposal.
- The alternatives (as required under Section 102 [2] [E] of NEPA).
- The environmental impacts of the proposed action and alternatives.

The EA results in either a Finding of No Significant Impact (FONSI) or a decision to prepare an EIS. If, based on this EA,

the US Marine Corps determines that the proposed action would have no significant impacts on the quality of the human environment, a FONSI will be issued. If the US Marine Corps determines that the proposed action would have a significant impact on the quality of the human environment, preparation of an EIS will be initiated.

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2. Proposed Action and Alternatives

The Council on Environmental Quality's (CEQ) regulations for implementing NEPA establish a number of policies for federal agencies, including "...using the NEPA process to identify and assess the reasonable alternatives to the proposed action that will avoid or minimize adverse effects of these actions on the quality of the human environment" (40 CFR 1500.2 [e]). This chapter describes the proposed action and the alternatives to the proposed action considered by the USMC.

2.1 Description of the Proposed Action

The proposed action would consist of the following main elements:

- Construction of a new, extended, and reinforced fence system (including two permanent guard booths) on the G Street, SE side of the Barracks, in front of the Commandant's House.
- Controlled curb-side parking on the south side of G Street, in front of the Commandant's House.
- Installation of bollards within the fence line at the northeast and northwest corners of the property (10 bollards at each location) and along the inside edge of the tree boxes (to be enlarged) at each end of the block (two bollards each).

The proposed action is illustrated in Figures 2-1a through 2-1e and described in more detail below.

2.1.1 New Fence System

The new fence system would extend over the entire length of the Barracks facing G Street, SE. Its main component would be a new front yard fence that would replace the existing one. This new fence would enclose the same area and be designed in the same style as the current fence, but it would be taller (4 feet 8 inches as opposed to 3 feet 3 inches), include a short (4

inches) curb, and be set on a below-grade concrete foundation approximately 2 feet, 6 inches deep. The additional height would make it unlikely that a person could step over the fence and reach the house before being noticed and intercepted by the guards on duty, as has happened in the past. The stronger foundation would make the fence more resistant to a potential vehicle assault. A central double gate would provide access to the front yard and house.

The existing front yard fence, which would be removed to construct the new one, would then be divided in half and each portion would be moved to the east and west, respectively, of the new fence, thus extending the fence system over the entire length of the Barracks on G Street, SE. Like the new fence, the relocated fence would be set on a short (4 inches) curb, with a 2-foot, 6-inch deep concrete foundation. This relocation would create two new enclosed areas, each about 21 feet wide, to the east and west of the Commandant's House along G Street, SE. After completion of the new fence system, these areas would be entirely (on the east side) or partially (on the west side) turned into ornamental gardens. A planted area would also be created outside the fence at the eastern end of the block, near 9th Street (see Figure 2-1c).

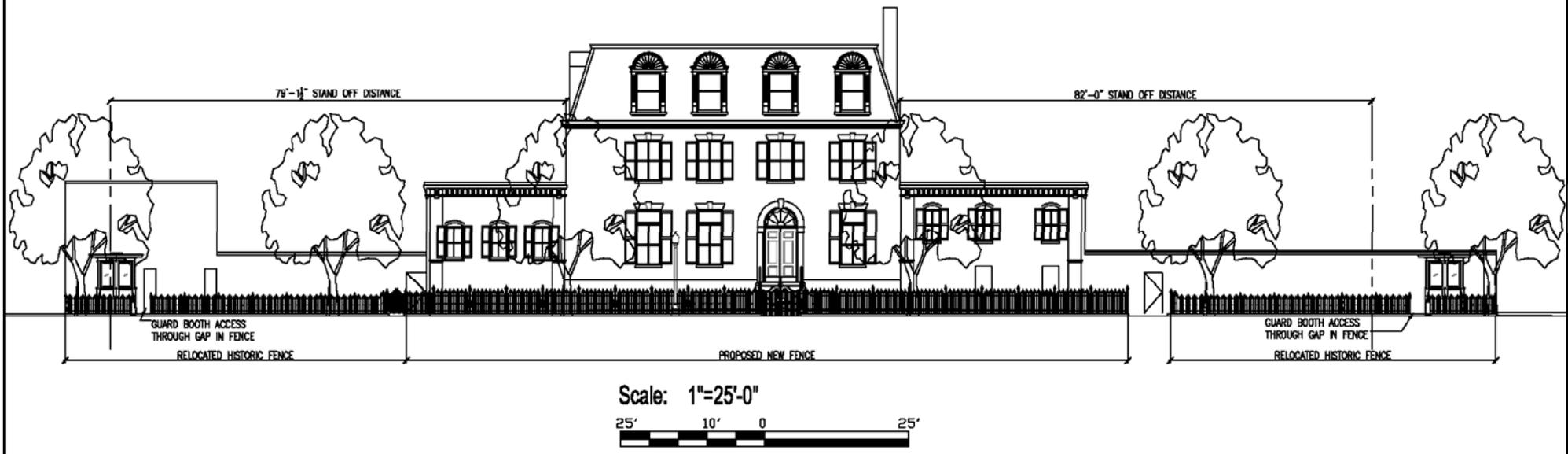
At each end of the newly extended fence system, within the fence, a hexagonal guard booth would be installed. The booths would be for guards on duty to take relief from inclement weather and warm up. They would be unassuming metal structures set up on raised concrete bases with slate access ways (see Figure 2-1e).

Finally, to complement the new fence system along G Street, SE, and visually enhance the site, the existing chain-link fencing atop the brick perimeter wall along 8th Street would be replaced by a decorative metal fence of a design consistent with that of the proposed fence in front of the Commandant's House.

2.1.2 Controlled Parking and Bollards

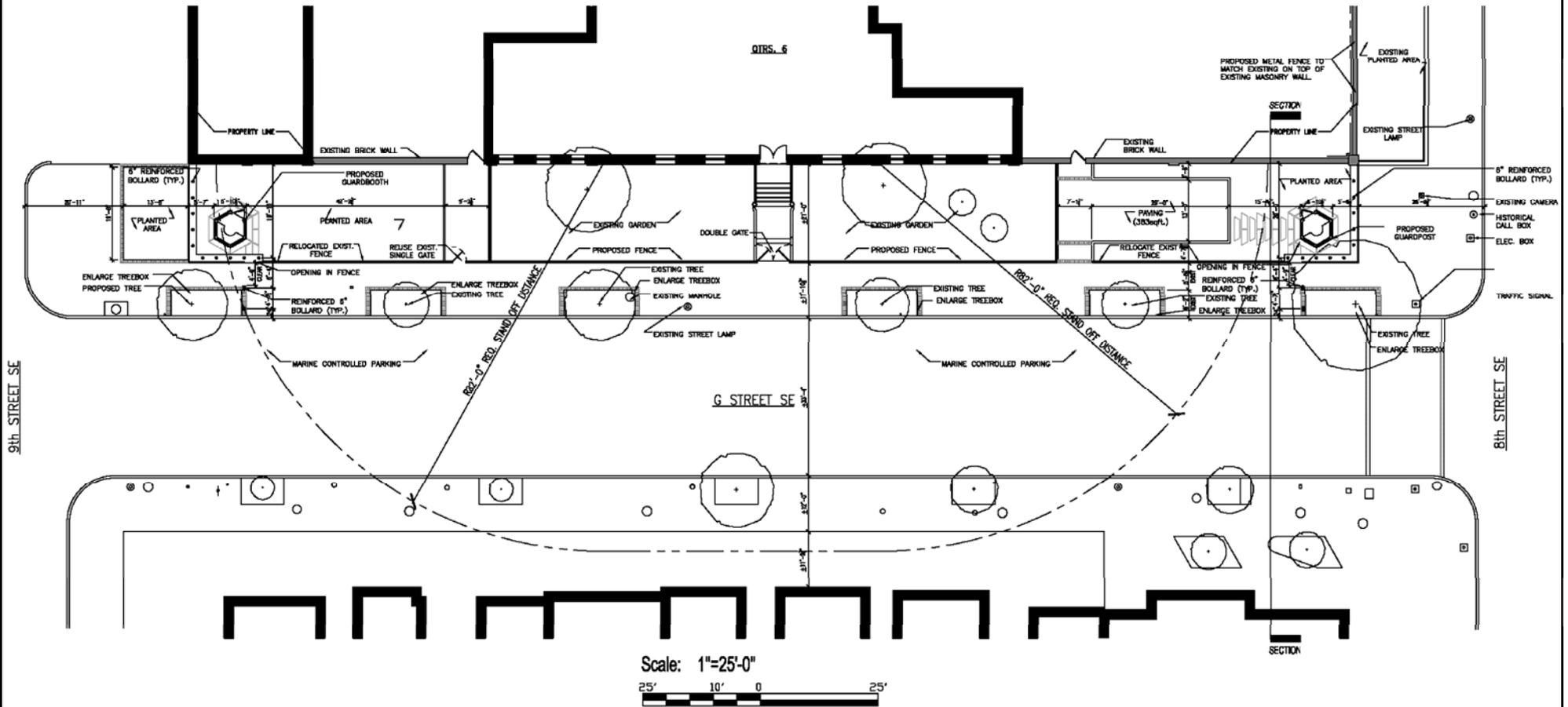
In spite of its concrete foundation, the new front yard fence would provide only limited protection to the Commandant's House against potential vehicular attacks. The proposed controlled curb-side parking along the south side of G Street outside the house would ensure that no unauthorized vehicle can come close enough to pose a significant risk. In effect, the parked vehicles would act like a barrier. Parking permits would be

Proposed Action - Elevation



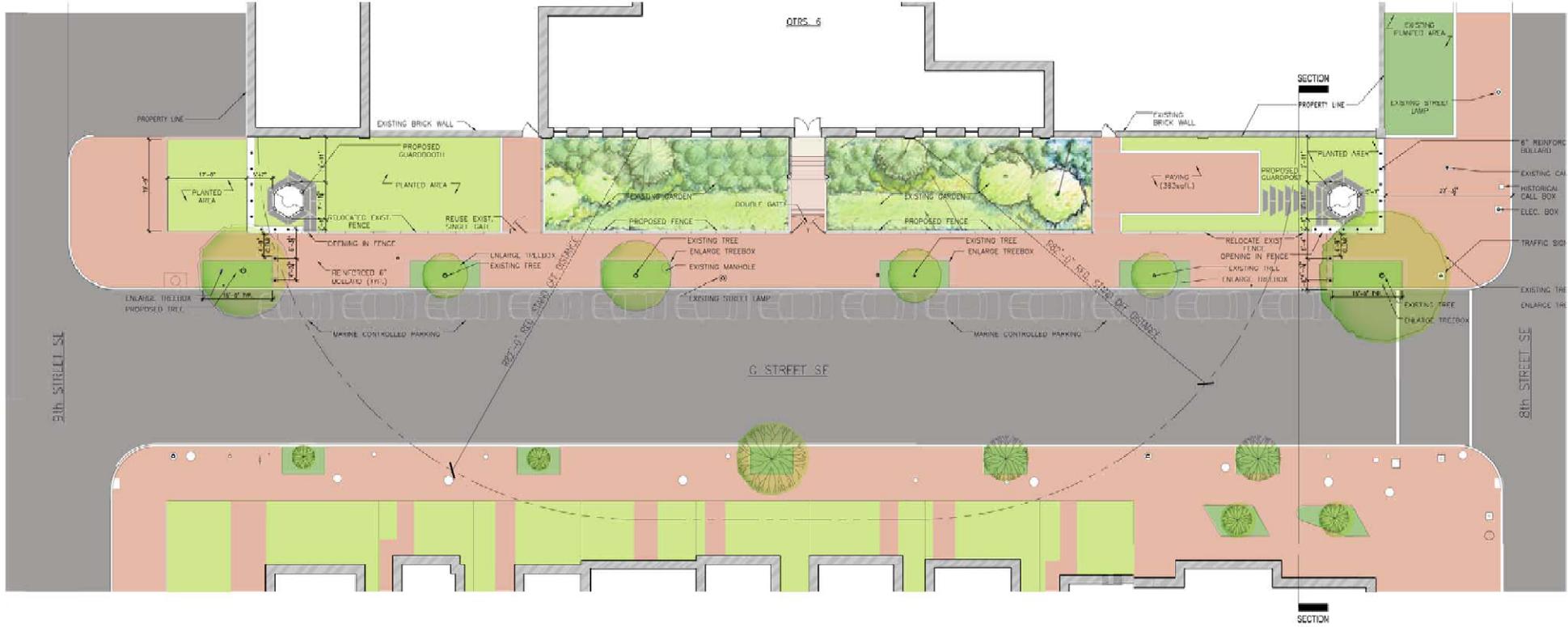
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Proposed Action - Site Plan



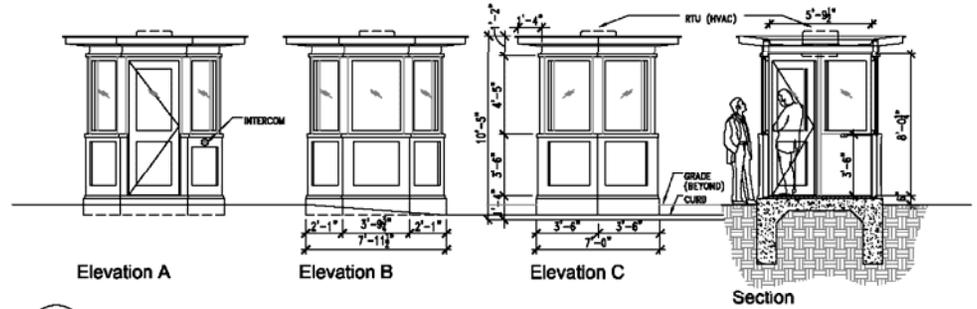
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Proposed Action - Landscape Plan

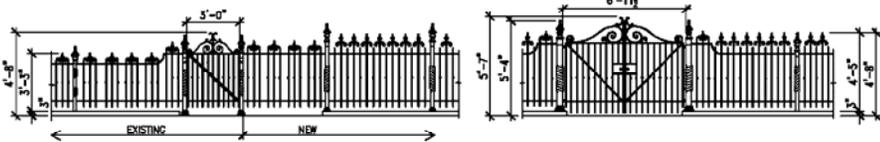


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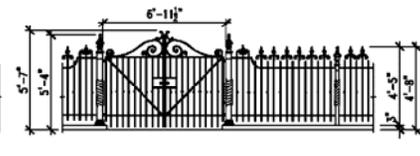
Proposed Action - Sections



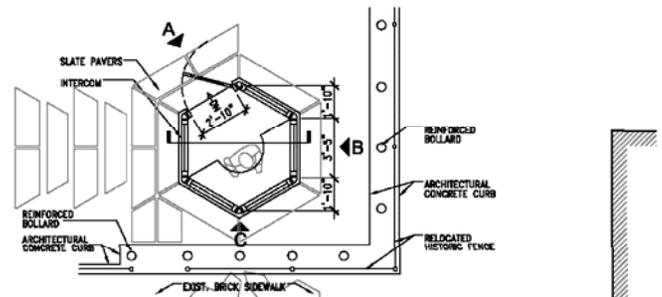
4 PROPOSED GUARD BOOTH ELEVATIONS
SCALE: 1/8" = 1'-0"



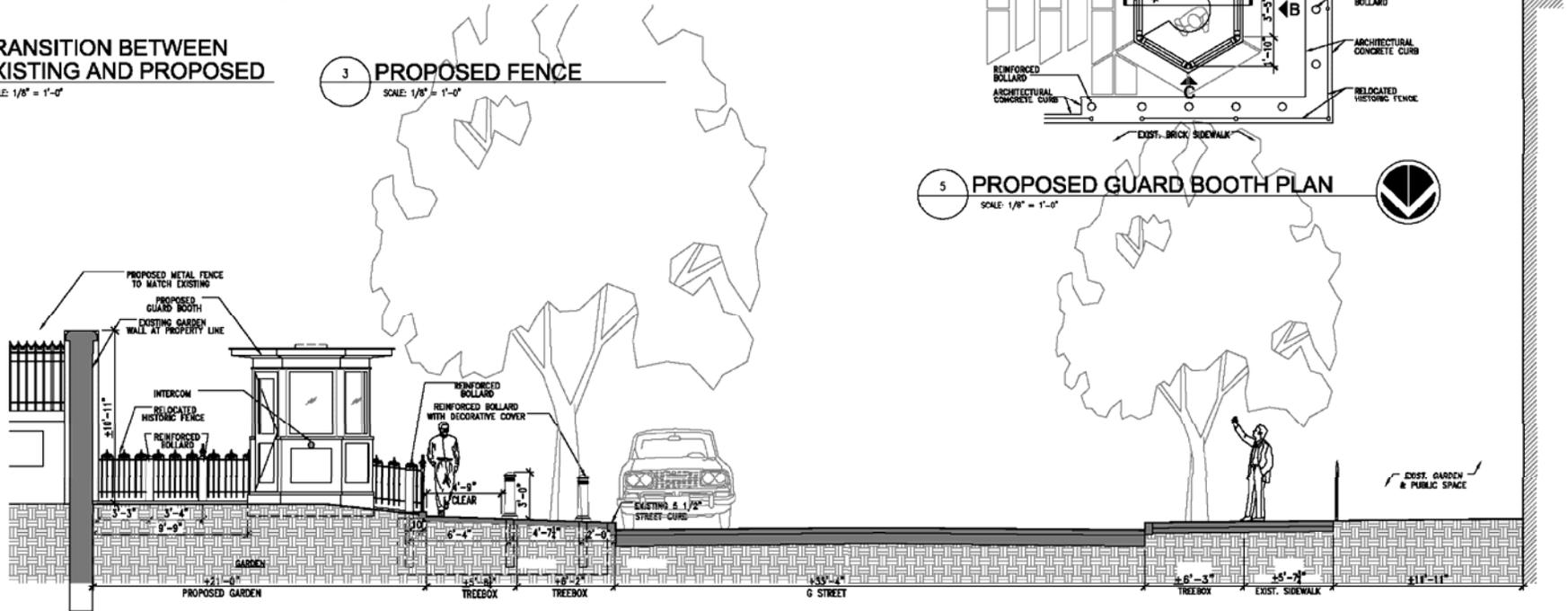
2 TRANSITION BETWEEN EXISTING AND PROPOSED
SCALE: 1/8" = 1'-0"



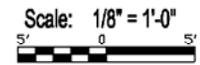
3 PROPOSED FENCE
SCALE: 1/8" = 1'-0"



5 PROPOSED GUARD BOOTH PLAN
SCALE: 1/8" = 1'-0"



1 PROPOSED GARDEN - STREET SECTION
SCALE: 1/8" = 1'-0"



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Proposed Action - Photo - Rendering: G Street and 8th Street, SE



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issued by the District of Columbia Department of Transportation (DDOT) to USMC personnel or local residents only.

A limited number of bollards would be installed to provide additional protection where the line of parked vehicles would not be sufficient, that is at each end of the block. The bollards would be made of metal, 6 inches in diameter and 36 inches tall. They would be set up in a visually non-obtrusive way inside the fence at both corners, near the proposed guard booths (ten bollards at each corner) and along the inside-facing edge of the enlarged tree boxes on the sidewalk outside the booths (two bollards at each location; these would be the only bollards in public space; see Figure 2-1e).

2.2 Alternatives to the Proposed Action

2.2.1 Alternative Development

An EA must consider and analyze the impacts of reasonable alternatives to the proposed action. Alternatives to meet the US Marine Corps' purpose and need to remedy security deficiencies at the Commandant's House were developed and evaluated through an iterative process that combined and balanced consideration of (1) the need to achieve adequate security standards and (2) the need to maintain the historic and aesthetic integrity of the house, one of the most significant historic properties in the District of Columbia, and to minimize any long-term disruption to the neighborhood. Only alternatives that strike the right balance between these two factors can be considered reasonable.

As alternative concepts were developed, the Marine Corps worked with a wide range of agencies and organizations that have an interest in the preservation of the historic and aesthetic integrity of the site to evaluate and refine them. These agencies and organizations include the DC Historic Preservation Office (HPO), the National Capital Planning Commission (NCPC), the Commission of Fine Arts (CFA), the National Park Service (NPS), the Capitol Hill Restoration Society (CHRS), and Advisory Neighborhood Commission (ANC) 6B.

In the course of this process, a number of potential concepts and solutions were considered and eventually dismissed because the consulting parties found that they did not achieve the right balance between security needs and preservation concerns. These concepts are briefly described in Section 2.2.2 below. As the design process moved forward, the comments and concerns of the

consulting parties about one concept were taken into account to develop the next option or set of options. The proposed action as described above is the ultimate result of this process. Because of the iterative manner it was developed, it is the only alternative that has been found by all parties to achieve the appropriate balance between security needs and preservation concerns. Therefore, no other alternative can be considered reasonable and the proposed action is the only alternative - other than No Action - considered in this EA.

2.2.2 Alternatives Considered but Dismissed

2.2.2.1 New Front Yard Fence without Bollards (Concept A)

Under this concept, illustrated in Figure 2-2a, the existing front yard fence would be replaced with a new fence that would provide protection against both pedestrian intrusion and vehicular attack. The new fence would be 7 feet and 6 inches tall and would consist of a 3-foot tall, pre-cast concrete or stone wall with brick facing on a sunken concrete foundation, with a cast iron fence on top. While this option would provide adequate protection, it would significantly alter the appearance and "open feel" of the site and prevent passers-by from viewing the front of the house and the front yard garden. As such, it was dismissed from further consideration.

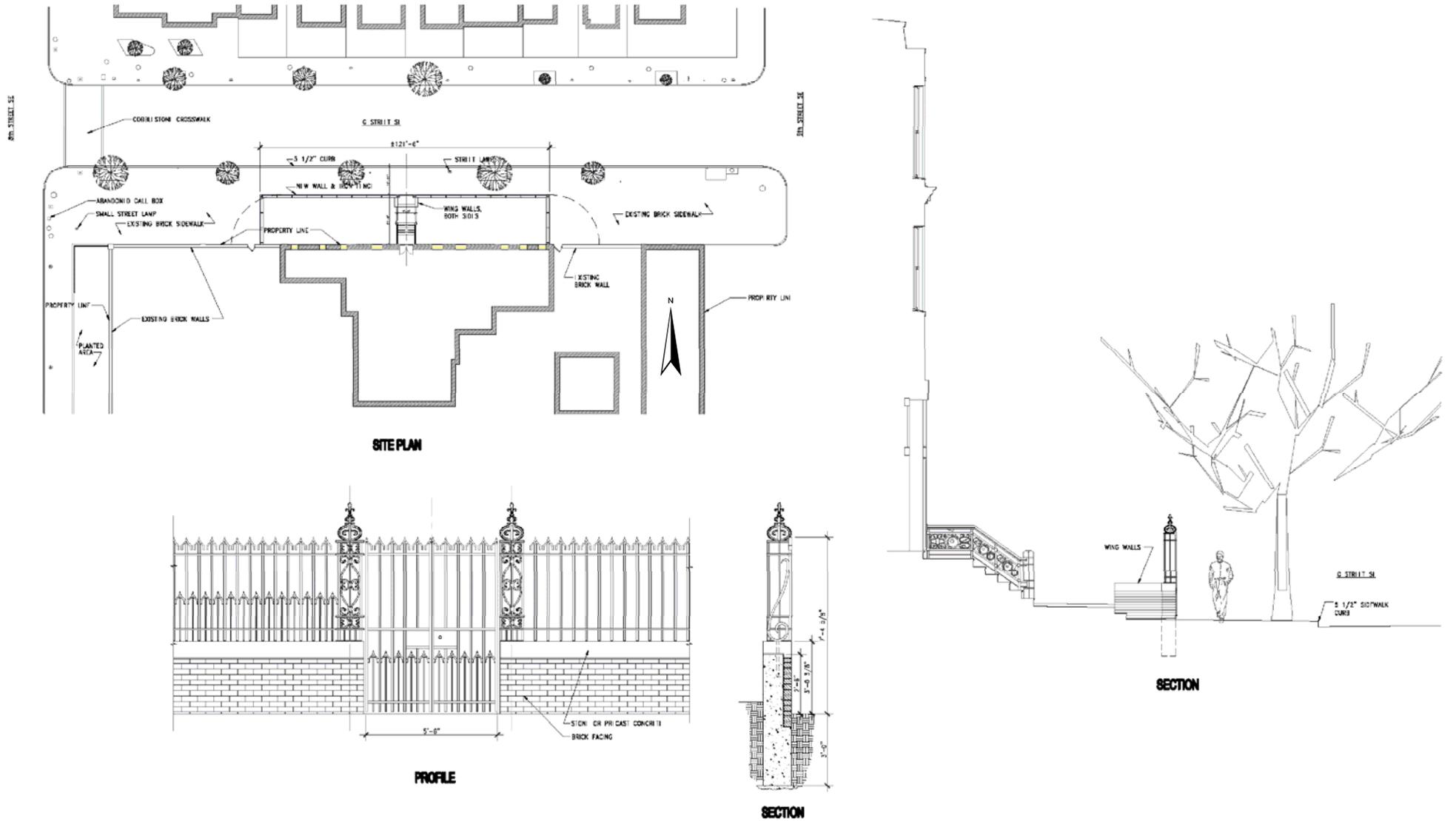
2.2.2.2 Modified Front Yard Fence with Bollards (Concept B)

Under this concept, the existing fence would be reinforced by resetting it on a short wall (for a total height of 3 feet and 6 inches) with a 3-foot deep concrete foundation while curb-side bollards would be installed around the entire northern end of the block, extending some distance down 8th and 9th Streets, SE (See Figure 2-2b), to provide protection against vehicular threats. However, the additional height of the fence would not sufficiently eliminate the risk of pedestrian intrusion, while the dense line of bollards would likely create an unwelcome sense of confined space along the entire width of the block. For these reasons, this alternative was dismissed from consideration.

2.2.2.3 Modified Front Yard Fence with Bollards (Concept B')

This concept is a variation on the previous one: the fence would be made taller by relocating two garden steps from inside to outside the fence line, thus allowing for a taller base wall

Alternatives Considered but Dismissed
New Front Yard Fence - No Bollards (Concept A)



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(for a total fence height of 4 feet, see Figure 2-2c) without obstructing views of the house front and garden. However, Concept B' was found to represent only an insignificant improvement over Concept B and was eventually dismissed from consideration.

2.2.2.4 Bollards Only (Concept C)

Under this concept, only bollards would be provided around the entire length of G Street, SE, between 8th and 9th Streets, SE (see Figure 2-2d). The existing front yard fence would remain as is. However, while this would provide adequate protection against vehicular threats, it would not improve protection against intrusions by pedestrians; therefore, it was dismissed from further consideration.

2.2.2.5 Bollards and Planters (Concept C')

This concept would combine curb-side bollards in front of the Commandant's House with curb-side planters on the sides (see Figure 2-2e). The existing front yard fence would remain in place. Although the planters would be more visually prominent than a simple line of bollards, and may present more of an obstacle to pedestrian movement, they would also provide a welcome visual echo of the house's garden. However, the lack of protection from pedestrian intrusion led to the dismissal of this option as well.

2.2.2.6 New Front Yard Fence with Side Gardens and Bollards (Concept D)

With respect to the fence system, this concept, illustrated in Figure 2-2f, is similar to the proposed action, with a new, higher fence being built in front of the house and the existing fence being reused to extend the fence line to the east and west, creating two enclosed gardens. In its original version, this concept included only one guardhouse. However, its primary distinctive feature was a line of bollards extending on the sidewalk in front of the Commandants' House between 8th and 9th Streets, approximately five feet apart of each other, intended to provide protection against vehicular threats. Community concerns about the height of the fence and the obtrusiveness of the bollards led to the dismissal of this concept.

2.2.2.7 Combination of Bollards and Shrubbery

This option would supplement the existing fence with a dense thorny shrubbery line to impede the pedestrian threat while curb-side bollards would minimize vehicular threats. However, supplementing the fence by shrubbery tall and dense enough to prevent intrusion would have a significant visual impact on the site, and, in particular, would hide from view the front of the Commandant's House and the front yard garden. Therefore, this alternative was dismissed from consideration.

2.2.2.8 Close G Street

Under this alternative, G Street, SE would be closed to vehicular and pedestrian traffic between 8th and 9th Streets, SE. Guarded gates would be set up at both ends of the block for access by authorized persons, including residents and their guests. Although this alternative would minimize all security threats and leave the Commandant's House untouched, it would significantly disrupt local pedestrian and vehicular traffic and impose a serious burden on local residents. As such, this alternative was dismissed as unreasonable.

2.2.2.9 Relocate USMC Commandant's Residence

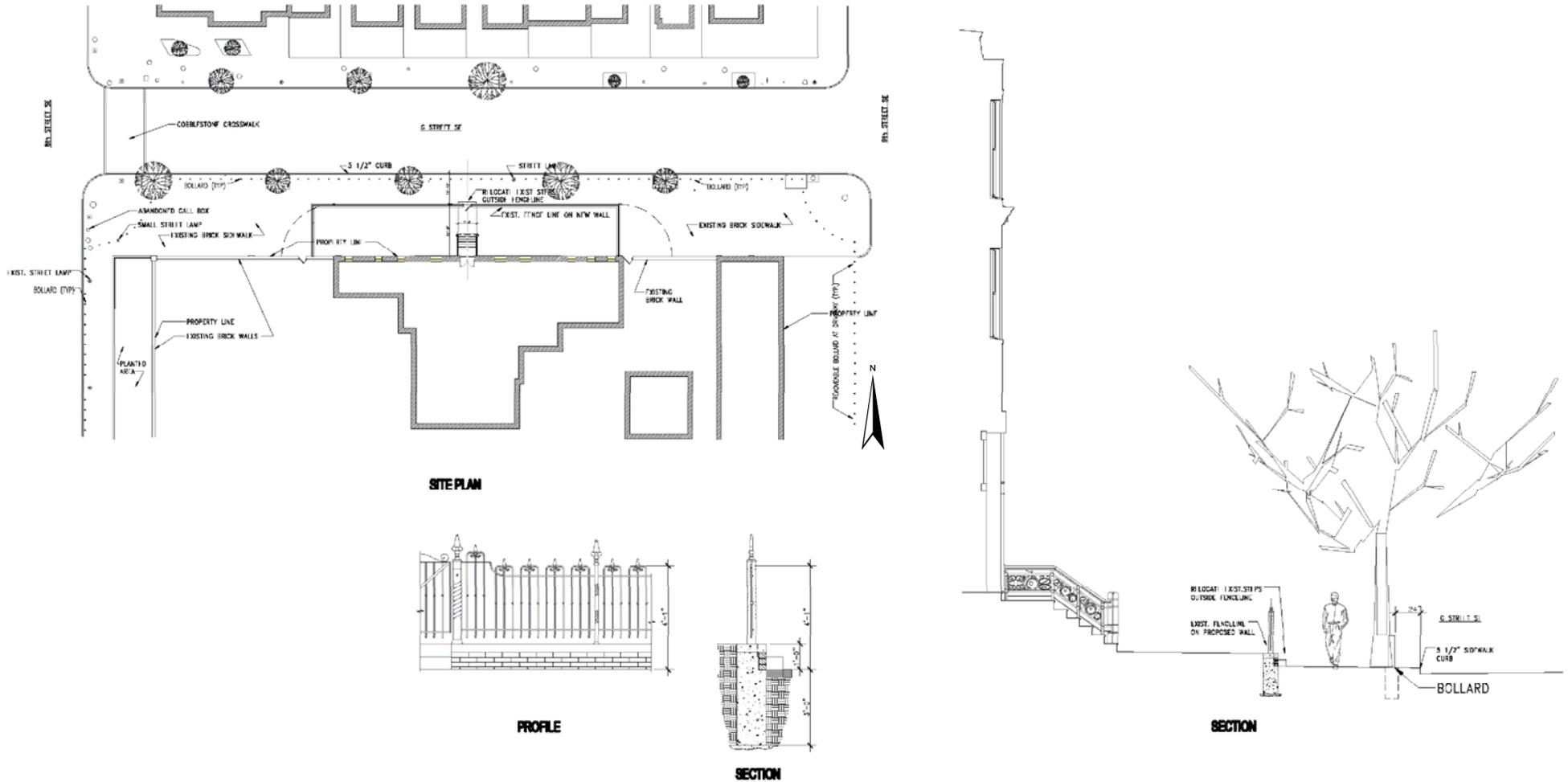
Under this alternative, the Commandant of the Marine Corps would cease to reside at the Barracks and a new official residence would be provided for him and his family at a location that meets applicable AT/FP requirements. However, in addition to the short-term disruption that this would cause, commandants of the US Marine Corps have been residing at the Barracks since the early 1800s and breaking this tradition may adversely affect the historic significance of the house. Additionally, there are few, if any, locations that are equivalent in prestige and accessibility to the current residence. Therefore, moving the residence of the USMC Commandant cannot be considered a reasonable alternative.

2.2.3 No Action Alternative

Under the No Action Alternative, no action would be taken to enhance security at the USMC Commandant's House. The existing fence would remain in place without any changes and the house would remain vulnerable to intrusion and vehicular attack. The No Action Alternative would not meet the purpose and need for the project and, therefore, cannot be considered reasonable.

Alternatives Considered but Dismissed

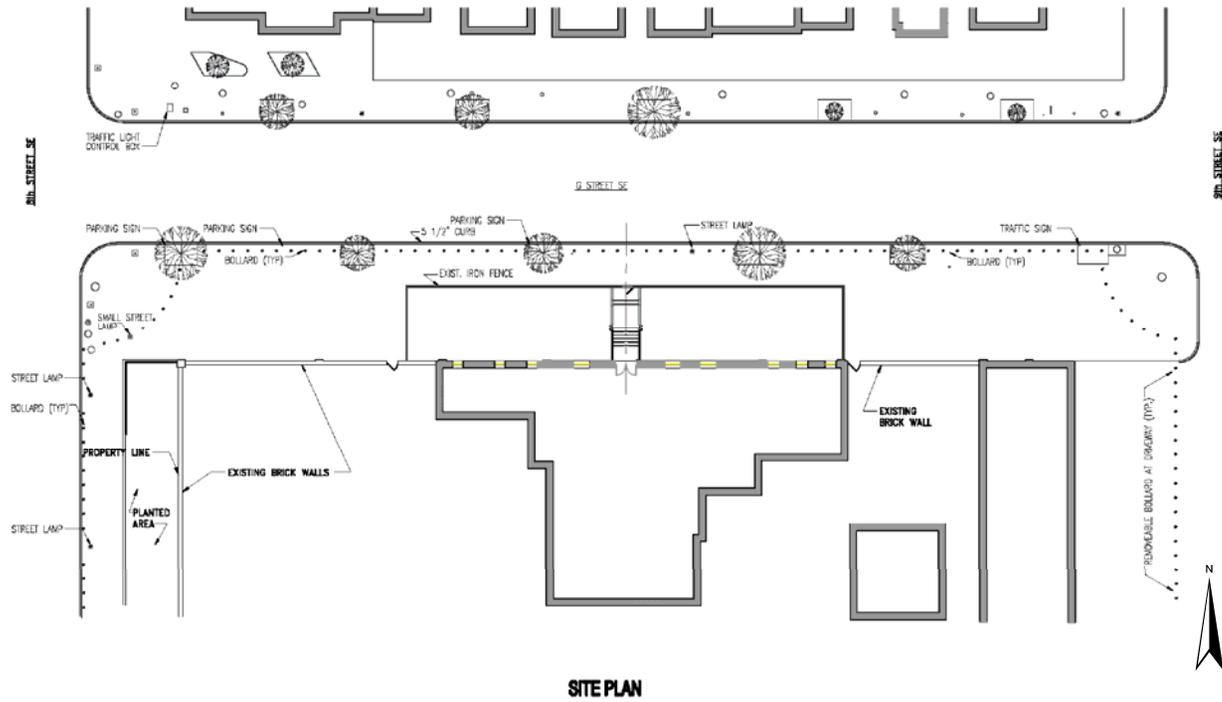
Modified Front Yard Fence with Bollards (Concept B')



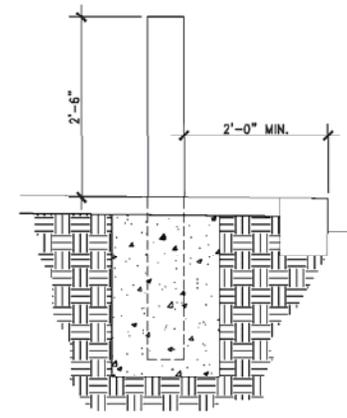
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Alternatives Considered but Dismissed

Bollards Only (Concept C)



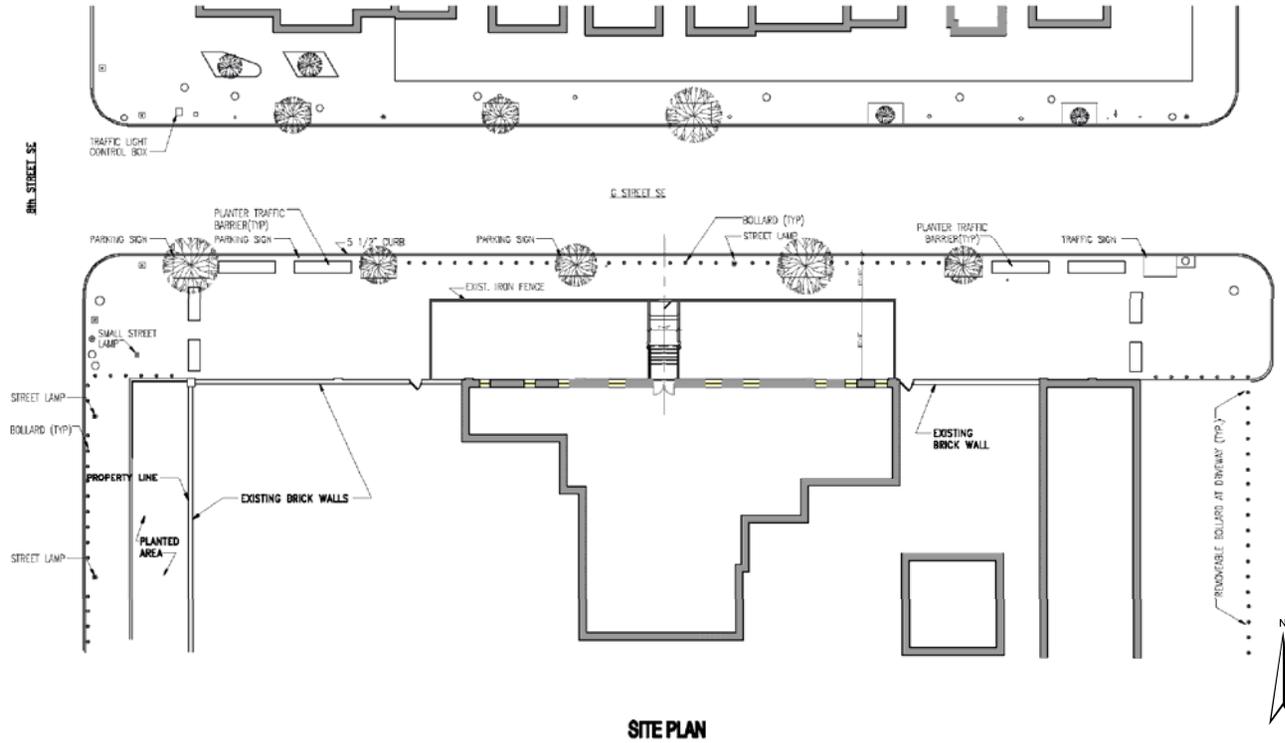
SITE PLAN



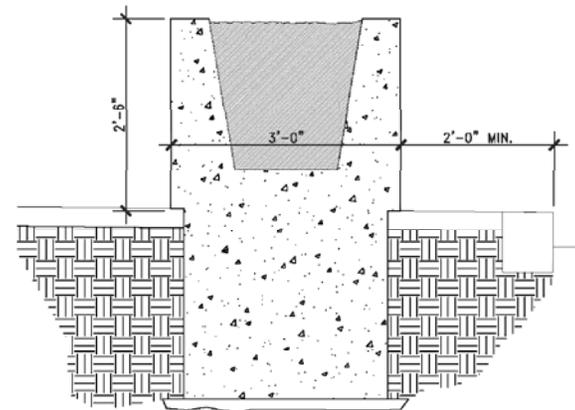
TYPICAL BOLLARD DETAIL

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Alternatives Considered but Dismissed Bollards and Planters (Concept C')



SITE PLAN



TYPICAL TRAFFIC BARRIER DETAIL

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However, consistent with NEPA regulations, it is evaluated in this EA because it provides a baseline against which to assess the impacts of the other alternatives.

2.3 Resources Not Considered in This EA

Consistent with 40 CFR 1501.7(a)(3), the following resources are not considered further in this EA because the proposed action has no potential to significantly affect them:

Natural Resources: the Marine Barracks is a densely-developed site within a long-established urban area. Most of the property is built or paved, and the only open areas consist of maintained grounds and ornamental lawns, shrubs, and trees. The area in front of the Commandant's House consists of a small front yard with a lawn and ornamental plantings, separated from the public sidewalk by a low cast iron fence. Six red maple trees stand on the sidewalk in front of the house. These trees are of medium size and appear to have been planted no more than ten to twenty years ago. The only animals likely to be present on or near the site are common urban species and pests. The area is level and is not within a floodplain. There are no streams or other natural or artificial bodies of surface water in or near the Barracks. Standard best management practices would minimize construction-related erosion. Precautions would be taken to minimize adverse effects to the maple trees in front of the house or their root systems when constructing the proposed fence system and associated improvements. Trees that would have to be removed would be replaced. Thus, the proposed action has no potential to adversely affect any natural resources. The establishment and maintenance of planted areas within and without the newly fenced-in areas on both sides of the Commandant's House would increase the amount of planted, pervious area in the District of Columbia by a small amount, resulting in a small positive impact.

Archaeological Resources: The Barracks are a fairly densely developed facility with few undisturbed areas. Preparation of the 1999 *Phase I Archaeological Resource Reconnaissance of Selected Portions of the US Marine Barracks Facility, Washington, DC*, included the archaeological testing of two relatively undisturbed areas (the Parade Ground and the west yard of the Commandant's House); no archaeological resources were found. The report concluded that extensive disturbance has lowered the potential for intact archaeological deposits in much of the Barracks property. Implementation of the proposed action

would result in soil disturbance in a narrow area currently occupied by the Commandant's House's existing fence line and surrounding sidewalk, a site that has been disturbed by the construction of the existing structures. Therefore, the proposed action is not expected to affect any archaeological resources.

Socioeconomic Resources, Environmental Justice, and Protection of Children: The proposed action does not involve any activities that could directly or indirectly affect the demographic make-up of the Capitol Hill neighborhood, where the Commandant's House is located, or of Washington, DC. The hiring of a private contractor to build the proposed security enhancements would have a positive economic impact, but, given the scale of the proposed improvements and the size of the regional economy, this positive impact would be very small. Based on Census 2000 data, the area where the project site is located (Census Tract 70) has a significantly smaller proportion of minority residents and economically-disadvantaged residents than Ward 6 or Washington, DC as a whole. Therefore, it does not qualify as an Environmental Justice community under Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. The area is not home to a disproportionately large number of children. The relative proximity of Tyler Elementary School suggests that school children may be walking by the project site on a regular basis. During construction of the proposed enhancements, any risk would be minimized by securing the site against unauthorized access as is commonly done with construction projects in an urban environment. Therefore, the proposed action is not expected to have a disproportionate adverse effect on children under EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*.

Noise: The Commandant's House is located in a long-established urban neighborhood primarily characterized by medium-density residential and commercial uses. Consistent with these land uses, the primary source of noise in the area is vehicular traffic along local roads. Noise levels are those typical of an active, medium-dense urban environment. The proposed action has no potential for long-term noise effects: no new source of noise or new sensitive receptor would be created. In the short term, implementation of the proposed action would result in some additional noise from construction activities. Actual noise levels would vary depending on the construction phase and would not exceed the noise typically generated by small-scale construction sites. Construction would take place during weekday daytime hours. Short-term impacts would be insignificant.

3 Affected Environment

CEQ's regulations (40 CFR Part 1500 et seq.) implementing NEPA require documentation that succinctly describes the environment of the area(s) potentially affected by the alternatives under consideration. The affected environment for the proposed action evaluated in this EA includes G Street, SE between 8th and 9th Streets, SE, the city block where the USMC Commandant's House is located. For some types of impacts, however, larger areas are considered and described, as appropriate. The potential impacts of the No Action and Proposed Action alternatives on the environment described in this chapter are evaluated in Chapter 4.

3.1 Land Use

The Marine Barracks lies in the southeast quadrant of the District of Columbia, on Capitol Hill, a long-established, historic neighborhood of the city. While the area contains numerous federal buildings and facilities, particularly in the vicinity of the US Capitol, most of it is characterized by medium-density housing (mostly two- or three-story townhouses) with low density commercial uses along the main axes, such as Pennsylvania Avenue and 8th Street, SE. Buildings, both commercial and residential, on the main axes are generally built to the lot lines with no or little spacing between them. On residential streets, townhouses generally have small front gardens separated from the tree-lined, brick sidewalk by low, decorative fences.

In that respect, the northern side of G Street, SE, between 8th and 9th Street, SE, across the street from the Barracks and the Commandant's House, is typical of the area. The southern side of the street is dominated by the house with, on either side, the perimeter wall of the Barracks. There are no other buildings or structures on the southern side of the street. The Barracks' wall extends along the eastern side of 8th, SE, and the western side of 9th Streets, SE down to I street, SE.

Near the Barracks, 8th Street, SE, one of the major commercial corridors of Capitol Hill, is characterized by stores,

restaurants, and small commercial buildings; 9th Street, SE is a typical Capitol Hill residential street. Just south of I Street, SE, the Southeast/Southwest Expressway (Interstate 295), an elevated facility, separates the Capitol Hill neighborhood from the Near Southeast neighborhood.

3.2 Relevant Plans and Design Guidelines

Development in the District of Columbia is guided by a number of plans and guidelines that aim to preserve the city's unique aesthetic quality and historical heritage as the nation's capital, while accommodating and fostering demographic and economic growth. The two main planning agencies for the city are the National Capital Planning Commission (NCPC), which represents the federal interest, and the District of Columbia Office of Planning (DCOP), an agency of the city government. The following paragraphs provide an overview of the current plans and guidelines that are relevant to the proposed action considered in this EA.

3.2.1 Comprehensive Plan for the National Capital

NCPC and DCOP prepare the *Comprehensive Plan for the National Capital*, which provides a statement of principles, goals, objectives, and planning policies for the future growth and development of Washington, DC. The *Comprehensive Plan* has two parts: the Federal Elements, prepared by NCPC, which contain recommendations directed at federal lands and the federal interest in the National Capital Region; and the District Elements, prepared by the DCOP, which deal with non-federal lands within the District of Columbia.

3.2.1.1 Federal Elements

The *Comprehensive Plan for the National Capital: Federal Elements* (NCPC, 2004) is prepared pursuant to Section 4(a) of the National Capital Planning Act of 1952, as amended. The plan contains recommendations directed at federal lands and the federal interest in the National Capital Region, which includes the District of Columbia. The elements relevant to the proposed action are:

- **Federal Workplace:** "Locate the federal workforce to enhance efficiency, productivity, and public image of

the federal government, to strengthen 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 national government."

- **Preservation and Historic Features:** "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 values of historic buildings and places and the symbol and character of the capital's setting."
- **Visitors:** "Accommodate visitors in a way that ensures an enjoyable and educational experience, showcases the institutions of the American culture and democracy, and supports federal and regional planning goals."
- **Parks, Open Space, and Natural Features:** "Conserve and enhance the park and open space system of the National Capital Region, ensure that adequate resources are available for future generations, and promote appropriate balance between open space resources and built environments."
- **Federal Environment:** "Conduct ... activities and manage ... property in a manner that promotes the National Capital Region as a leader in environmental stewardship and preserves, protects, and enhances the quality of the region's natural resources, providing a setting that benefits the local communities."

3.2.1.2 District Elements

The 1973 Home Rule Act (Public Law 93-198, as amended), which gave District residents the right to govern themselves, also required the District government to develop a comprehensive plan. The *Comprehensive Plan* is a general policy document that provides overall guidance for future planning and development of the city. The first *Comprehensive Plan* was adopted in 1984 and 1985. It has been updated periodically, and most recently underwent a 3-year revision which was completed and adopted in December, 2006. The District elements of the *Comprehensive Plan* relevant to the proposed action are:

- **Urban Design:** "Enhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces."
- **Historic Preservation:** "Preserve and enhance the unique cultural heritage, beauty, and identity of the District of Columbia by respecting the historic, physical form of the city and the enduring value of its historic structures and places, recognizing their importance to the citizens of the District and the nation, and sharing mutual responsibilities for their protection and stewardship."
- **Land Use:** "Lay out policies through which the city will accommodate growth and change while conserving and enhancing neighborhoods, community districts and other areas."
- **Transportation:** "Create a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of residents, workers, and visitors while supporting the local and regional economy and enhances the quality of life of District residents."
- **Parks, Recreation, and Open Space:** "Preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of the national capital."
- **Environmental Protection:** "To protect, restore, and enhance natural and man-made environments" by improving environmental quality, preventing and reducing pollution, and conserving natural resources and ecosystems.

The District elements of the *Comprehensive Plan* also include plans for each of the District's 10 neighborhood-based planning areas. The proposed action would take place at a location within the Capitol Hill Area. The Capitol Hill Area lies primarily east

of the US Capitol building. It is bounded by Florida Avenue and Benning Road to the north, the Anacostia River to the east, and the Southeast/Southwest Freeway and the Anacostia River to the south. The objectives of the Capitol Hill Area Element that are relevant to the proposed action are:

- **Urban Design:** (a) To improve buffering and urban design within the transition areas between emerging high-density residential and commercial areas and traditional residential areas. (b) To acknowledge and protect the unique architectural character of Capitol Hill and preserve the continuity of the well-established, essential, and historic areas. (c) To ensure that new development and infill development complements and translates land uses into compatible, physical settings and encourage a high quality of architecture consistent with the styles and characteristics of existing buildings.
- **Preservation and Historic Features:** (a) To ensure park facilities and the Anacostia waterfront parks are designed and planned to benefit Capitol Hill area residents. (b) To improve parks, playgrounds, and recreation facilities throughout Capitol Hill. (c) To protect and preserve the historic character of the residential neighborhoods in the Capitol Hill and Anacostia Historic District, including Congressional Cemetery. (d) To consider the streets as open space. (e) To develop graphic design guidelines for the Capitol Hill district to encourage new development and renovation of structures that are sensitive to the character of the historic Capitol Hill area. (f) To monitor the use, modification, and proposed demolition of buildings to ensure preservation and compatibility with Capitol Hill.
- **Land Use:** (a) To maintain the general level of the existing Capitol Hill residential uses and densities. (b) To minimize conflicts between the various land uses in the Capitol Hill area. (c) To encourage additional locally-serving businesses appropriate to the residential character of Capitol Hill.
- **Transportation:** (a) To establish traffic management strategies to reduce commuter traffic on predominately residential streets and enact measures to re-route through traffic and restrict trucks and heavy vehicles

on local streets. (b) To provide an adequate balanced circulation system, properly related to residential, commercial/retail, and other land uses, which will enhance the aesthetic and environmental characteristics along streets as well as minimize traffic congestion. (b) To develop, as appropriate, a network of trails, including hiking and biking, designed to connect residential, employment, education, and open space areas and to provide for the commuting needs of area residents. (c) To mitigate the effects of the Southeast/Southwest Freeway including noise, emissions, dust, and visual blight, and evaluate the impacts of the proposed freeway replacement tunnel and grade-level boulevard. (d) To support the optimum use of mass transit by workers, visitors, and tourists to Capitol Hill area.

- **Environmental protection:** (a) To improve the quality of water in the District's rivers and streams to meet public health and water quality standards and to maintain the physical, chemical, and biological integrity of these watercourses for multiples uses, including recreation. (b) To protect the overall environmental quality of the Ward 6 land areas by preventing further soil erosion, promoting the restoration of eroded areas, and enforcing prohibitions against illegal dumping and other destructive practices. (c) To reduce the level of noise and litter and improve air quality. (d) To monitor noxious air pollutants from vehicular and railway uses.

3.2.2 Planning for Security Improvements

Because of the presence of the federal government and numerous high-risk sites and buildings, security has always been a major concern in Washington, DC. The terrorist attacks of September 11, 2001 increased the urgency of this concern. However, necessary security improvements have the potential to adversely affect the city's historic character, increase traffic congestion, and disrupt streetscapes and vistas with jersey barriers, concrete planters, and guard sheds.

In March 2001, NCPC formed an Interagency Security Task Force to identify permanent, comprehensive solutions to this problem. In the fall of 2001, the Task Force released *Designing for Security*

in the Nation's Capital, a report that made recommendations for improving security and urban design in the monumental core of the city. Following up on a recommendation of the report, NCPC released a *National Capital Urban Design and Security Plan* in October 2002.

3.2.2.1 National Capital Urban Design and Security Plan

The 2002 *National Capital Urban Design and Security Plan*, reissued in 2004 with an addendum, explores innovative urban design solutions to threats from terrorism. It is a comprehensive security plan that identifies permanent security and streetscape improvements. Six security and design goals are outlined in the plan, all of which are relevant to the proposed action. The goals are the following:

- Balance the need for perimeter security of buildings and occupants with maintaining the vitality of the public realm.
- Security should be in the context of streetscape enhancement and public realm beautification.
- Expand the range of security design elements.
- Streetscape and security design strategy should incorporate aesthetic conformity.
- Provide security that does not impede economic vitality or excessively impede use of sidewalks, pedestrian and vehicular traffic, and health of trees.
- Implement and coordinate security strategies in the most cost-effective manner.

3.2.2.2 Designing and Testing of Perimeter Security Elements

This brochure provides guidance on the latest creative security solutions, including placement and design of perimeter security barriers, while encouraging a multi-faceted approach to such solutions. It is a tool for designers, architects, security professionals, and building managers and offers practical security solutions that incorporate the design aesthetics of the nation's capital.

3.2.3 2001 Master Plan Update - Marine Barracks, 8th and I Streets, Southeast, Washington, DC

This master plan update provides information necessary to plan for the correction of the installation's deficiencies, the improvement of operational capabilities, and the acquisition of land and facilities needed to support the Barracks' mission in the 21st century. The plan outlines objectives and contains proposals for all four components of the Barracks. The main master planning objective for the Main Post is "To maximize the use of the historically significant and traditionally strong Main Post." The master plan update does not contain any specific proposals or goals that are directly relevant to the proposed security improvements for the Commandant's House.

3.3 Transportation

Regional vehicular access to the Marine Barracks and the Commandant's House from the south is via the Southeast/Southwest Freeway (Interstate 295) and 8th Street, SE. Regional access from the north is via Massachusetts Avenue, Independence Avenue, or Pennsylvania Avenue, and 8th Street, SE. Eighth Street, SE to the west of the Barracks is a minor arterial; to the north and east, G and 9th Streets, SE are two-way local roads; to the south, I Street, SE, is a one-way westbound collector road. The intersection of 8th Street and G Street, SE is a signalized intersection; at the other end of the block, the intersection with 9th Street, SE is un-signalized. Curb-side parking is available on both sides of G Street, SE.

Three Metrobus lines (90, 92, and 93) serve the Barracks via 8th Street, SE, with a stop at 8th and G Streets, SE, and one at 8th and I Streets, SE. No bus lines run along G Street, SE. The nearest Metrorail station is Eastern Market, located three blocks north on 8th Street, SE.

All streets around the Marine Barracks have sidewalks that are 9 to 12 feet wide. On the northern side of G Street, SE across from the Commandant's House, the sidewalk is 12 feet wide. On the southern side, it varies from about 32 feet wide on the sides (where it extends to the installation's perimeter wall) and 12 feet wide directly in front of the house and front yard (only 5 feet at the tree boxes). The intersection of 8th and G Streets, SE, has crosswalks with countdown timers. The intersection of 9th and G Streets, SE, only has crosswalks.

No quantitative data are available on car and pedestrian traffic levels along G Street, SE, in front of the Commandant's House. Casual observation does not suggest that congestion is an issue at this location. In addition to local residences, the main generators of both car and pedestrian traffic on G Street, SE, across from the Commandant's House, likely are the restaurants and retail locations on 8th Street, SE, as visitors drive around in search of a parking space and walk from and back to their cars. Other traffic generators are the Barracks themselves, particularly when public events are scheduled, and the nearby Tyler Elementary School.

3.4 Air Quality

3.4.1 National Ambient Air Quality Standards

The US Environmental Protection Agency (USEPA), under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50). These pollutants are carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM₁₀ and PM_{2.5}), lead (Pb), and sulfur dioxide (SO₂). The NAAQS include primary and secondary standards. The primary standards were established at levels sufficient to protect public health with an adequate margin of safety. The secondary standards were established to protect the public welfare from the adverse effects associated with pollutants in the ambient air. The primary and secondary standards are presented in Table 3-1.

3.4.2 National Ambient Air Quality Standard Attainment Status

Areas that meet the NAAQS for a criterion pollutant are designated "in attainment;" areas where a criterion pollutant level exceeds the NAAQS are designated "in nonattainment." O₃ nonattainment areas are categorized based on the severity of their pollution problem - marginal, moderate, serious, severe, or extreme. CO and PM₁₀ nonattainment areas are moderate or serious. When insufficient data exist to determine an area's attainment status, it is designated unclassifiable (or in attainment). The Washington, DC, area, where the Commandant's House is located, is a moderate nonattainment area for O₃ and a nonattainment area for PM_{2.5}; it is in attainment for all other criteria pollutants.

Table 3-1
National Ambient Air Quality Standards

Pollutant and Averaging Time	Primary Standard		Secondary Standard	
	$\mu\text{g}/\text{m}^3$	ppm	$\mu\text{g}/\text{m}^3$	ppm
Carbon Monoxide				
8-hour concentration	10,000 ¹	9 ¹	-	
1-hour concentration	40,000 ¹	35 ¹	-	
Nitrogen Dioxide				
Annual arithmetic mean	100	0.053	Same as primary	
Ozone				
8-hour concentration	-	0.075 ²	Same as primary	
Particulate Matter				
PM _{2.5} :				
Annual arithmetic mean	15 ³	-	Same as primary	
24-hour maximum	35 ⁴	-		
PM ₁₀ :				
24-hour concentration	150 ¹	-		
Lead				
3-month arithmetic mean	1.5 ⁵	-	Same as primary	
Sulfur Dioxide				
Annual arithmetic mean	-	0.03	-	-
24-hour concentration	-	0.14 ¹	-	-
3-hour concentration	-	-	-	0.50 ¹
Notes:				
¹ Not to be exceeded more than once per year.				
² 3-year average of the 4th highest daily maximum 8-hour concentration may not exceed 0.075 ppm.				
³ Based on 3-year average of annual averages.				
⁴ Based on 3-year average of annual 98th percentile values.				
⁵ Based on rolling 3-month averages over a 3-year period.				
Source: 40 CFR 50.				

3.4.3 Local Ambient Air Quality

Ambient air quality conditions in the Washington, DC metropolitan area are monitored at many locations. The most recent available data (for the year 2008) from the monitoring stations closest to the Marine Barracks can be used to describe existing ambient air quality at the project site. These data are shown in Table 3-2. All measurements are below the standards, with the exception of O₃, consistent with the regional designation as an O₃ nonattainment area. Though the Washington, DC area is in nonattainment for PM_{2.5}, monitored data near the project site are below the threshold.

Table 3-2
Local Ambient Air Quality

Pollutant and Averaging Time	Monitored Data	Primary Standard	Secondary Standard	Monitoring Site Location
Carbon Monoxide 8-hour maximum (ppm) 1-hour maximum (ppm)	3.0 2.6	9 35	9 35	34 th Street and Dix Street, NE
Nitrogen Dioxide Annual Arithmetic Mean (ppm)	0.014	0.053	0.053	2500 1 st Street, NW
Ozone 8-hour 3-yr, 4 th maximum average (ppm)	0.086	0.08	0.08	2500 1 st Street, NW
Particulate Matter (PM _{2.5}) Annual Arithmetic Mean (ug/m ³) 24-hour Maximum (ug/m ³)	12.2 32.8	15 35	15 35	Park Services Office 1100 Ohio Drive
Particulate Matter (PM ₁₀) 24-hour Maximum (ug/m ³)	30.00	150	150	34 th Street and Dix Street, NE
Sulfur Dioxide Annual Arithmetic Mean (ppm) 24-hour Maximum (ppm) 3-hour Maximum (ppm)	0.006 0.031 0.035	0.030 0.140 -	- - 0.500	34 th Street and Dix Street, NE
Source: USEPA Air Data: http://www.epa.gov/air/data/geosel.html				

3.4.4 State Implementation Plan

The CAA, as amended in 1990, mandates that state agencies adopt state implementation plans (SIPs) that target the elimination, or a reduction in the severity and number, of violations of the NAAQS. SIPs set forth policies to expeditiously achieve and maintain attainment of the NAAQS.

The SIPs applicable to the Washington, DC, metropolitan area are the *Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan for 8-Hour Ozone* (MwCOG, May 23, 2007) and the *Plan To Improve Air Quality In The Washington, DC-MD-VA Region, State Implementation Plan (SIP) for Fine Particle (PM_{2.5})* (MwCOG, March 7, 2008).

The O₃ SIP is a plan to improve air quality in the Washington region to meet the eight-hour O₃ standard by 2009. It consists of a Reasonable Further Progress Plan, 2002-2008; an attainment plan; an analysis of reasonably available control measures; an

attainment demonstration; contingency plans for attainment; and mobile source budgets for 2008, 2009, and 2010. The plan establishes a base year inventory for 2002 and projected inventories for 2008 and 2009.

The PM_{2.5} SIP is a plan to demonstrate continued improvement and compliance with the 1997 NAAQS for PM_{2.5} in the Washington region in 2009. The plan consists of base-year inventories for 2002; projection inventories for 2009; an attainment plan; a demonstration of reasonably available control measures; motor vehicle emission budgets for 2009 and 2010; attainment demonstration; and contingency plans for attainment.

3.4.5 Clean Air Act Conformity

The Clean Air Act Amendments (CAAA) of 1990 expand the scope and content of the act's conformity provisions in terms of their relationship to a SIP. Under Section 176(c) of CAAA, a project is in "conformity" if it corresponds to a SIP's purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of the standards. Conformity further requires that such activities should not:

- Cause or contribute to any new violation of any standard in any area;
- Increase the frequency or severity of any existing violation of any standard in any area; or
- Delay timely attainment of any standard or any required interim emission reduction or other milestone in any area.

The USEPA published final rules on general conformity (40 CFR Parts 51 and 93 in the *Federal Register* on November 30, 1993) that apply to Federal actions in areas designated in nonattainment for any of the criteria pollutants. The rules specify *de minimis* emission levels by pollutant to determine the applicability of conformity requirements for a project.

The proposed action would take place in a moderate nonattainment area for O₃ in an O₃ transport region and a nonattainment area for PM_{2.5}. The applicable *de minimis* are 100 tons per year (tpy) (91 metric tpy) for NO_x, PM_{2.5}, and SO₂; and 50 tpy for volatile organic compounds (VOC). (NO_x and VOC are precursors of O₃; SO₂ is a PM_{2.5} precursor.)

An applicability analysis of the air quality impact of the proposed action under the general conformity rule is discussed in Section 4.4 and detailed in Appendix B.

3.5 Cultural Resources

A number of federal laws, executive orders, and regulations require that cultural resources meeting the eligibility criteria of the National Register of Historic Places be identified, evaluated, and considered when planning Federal actions, including:

- Sections 106 and 110 of the National Historic Preservation Act (NHPA) of 1966, as amended.
- Executive Order 11593, Protection and Enhancement of the Cultural Environment.
- OPNAVINST 5090.1B, Environmental and Natural Resources Program Manual.
- Marine Corps Order P5090.2A, Change 2, Chapter 8, Cultural Resources Management.

The historic Marine Barracks and the Commandant's House are listed in the National Register of Historic Places and are collectively an NHL. Management of historic resources at the Marine Barracks is guided by the *Integrated Cultural Resource Management Plan (ICRMP) for U.S. Marine Barracks, Washington, D.C.* The objectives of the ICRMP are to (1) allow the installation to meet its military mission (2) achieve the installation's cultural resources management goals and (3) allow the installation to meet legal and policy requirements consistent with current national cultural resources management philosophies. The ICRMP is in the process of being updated.

3.5.1 Historic Overview

Two years after the adoption of the US Constitution, Congress authorized President George Washington to choose a site for a new federal capital along the banks of the Potomac River. After selecting the site, Washington asked French engineer Pierre Charles L'Enfant to design the new federal city. By 1791, L'Enfant had devised a plan characterized by radiating avenues,

parks, and vistas overlaid upon an orthogonal street grid. In spite of subsequent alterations, the L'Enfant Plan still provides the basic urban framework of Washington, DC.

In 1799, the Washington Navy Yard was officially established in the southeast quadrant of the developing city, on the northern bank of the Anacostia River. Two years later, a site north of the Navy Yard and not far south of the US Capitol was selected to house the units of the recently (1798) re-established Marine Corps assigned to the city. Construction of the original Marine Barracks began in 1801, though it is likely that it was not completed and occupied until a few years later.

The original installation, including the Commandant's House, was designed by architect George Hadfield, who designed a number of buildings in the District of Columbia. The new compound consisted of two main elements: the Commandant's House on G Street; and a two-story officers' quarters building (Center House) flanked by two single-story barracks on 8th Street. All these buildings were constructed of bricks. The eastern side of the site was occupied by an assortment of support buildings, including stables, storerooms, and another barrack. A parade ground occupied the middle of the site, which was surrounded by a perimeter wall in 1806.

These facilities remained in use until 1902. That year, the firm of Hornblower and Marshall was awarded a contract to redesign the site. The plan called for the construction of two new two-story buildings: one on the 9th Street side of the site over almost the entire length of the block; the other along I Street. These buildings were intended for use by the Marine Band and included a large concert hall. Both buildings were to be made of brick, with a first-floor walkway set behind a series of arches. A central castellated tower and two smaller towers helped relieve the long expanse of the roof. Once the new buildings were ready, the old Center House and its wings, on 8th Street, were demolished and replaced by four separate dwellings for senior officers and one to serve as bachelor officers' quarters. Of the original buildings, only the Commandant's House remained. Since this major campaign of reconstruction ended, in 1906, only minor alterations or additions have been made to the Barracks.

The reconstruction of the Barracks coincided and was associated with an effort to revive and revitalize the concepts behind the L'Enfant Plan linked to the City Beautiful movement and embodied by the McMillan Commission, which is, among other things, responsible for the monumental development of the National Mall.

3.5.2 Architectural Resources

In addition to the Commandant's House and its immediate surroundings, three historic resources also require some consideration because they encompass the house and form an interconnected cluster of highly significant historic resources in the District of Columbia. They are the Marine Barracks Historic District, the Capital Hill Historic District, and the L'Enfant Plan. All are listed in the National Register of Historic Places. All are also District of Columbia-listed historic sites. Additionally, the Marine Barracks and Commandant's House are, collectively, an NHL.

3.5.2.1 The USMC Commandant's House

As previously noted, the Commandant's House is a historic resource of extraordinary importance. It was listed in the National Register in 1972, and designated a National Historic Landmark with the rest of the Marine Barracks in 1976. The Commandant's House is the only surviving building from the original Barracks and one of the few surviving works of George Hadfield, whom Thomas Jefferson called "our first architect." The house is a 2 1/2-story Federal style brick townhouse. Though it has received several additions, all of them historic, the original design is still clearly visible and many original details remain.

3.5.2.2 US Marine Barracks Historic District

The Marine Barracks Historic District, added to the National Register in 1972 and designated a National Historic Landmark in 1976, is bounded by 8th Street, SE to the west; G Street, SE, to the north; 9th Street, SE, to the east; and I Street, SE, to the south. It comprises the buildings constructed in 1902-1906, plus the parade ground and the landscape perimeter, for a total of 11 contributing elements (excluding the Commandant's House). From north to south, Buildings 1, 2, 3, 4, and 5, on 8th Street, SE, are the Officers Quarters. All have a similar design and floor plan. They face inward onto the parade ground. Each ground story has an entrance porch and the second story is three bays wide with plain sash windows and limestone lintels. A decorative, heavy cast iron fence stretches between the west wall of each house to form a continuous barrier along 8th Street, SE. Building 9, the Band Hall, occupies the south side of the Barracks and is a 2 1/2-story brick building about 200 feet long and 60 feet deep, with a ground story recessed behind an arcaded loggia. It has a hipped roof with small dormer windows. Building 8, the Old

Barracks, is similar in design to Building 9, though longer: it extends over 490 feet along 9th Street, SE. It is interrupted by three pavilions that project above the façade and roof line. Like the Officers Quarters, Buildings 8 and 9 faced inward toward the parade ground, which is the ceremonial core of the Barracks and consists of a manicured grass field with mature trees along the east and west sides. Building 7, warehouse and garage, north of Building 8 on 9th Street, SE; and Building 10, gate and sentry house, south of Building 5, are two other contributing elements to the district.

3.5.2.3 Capitol Hill Historic District

The Capitol Hill Historic District is bounded by the US Capitol precinct on the west, F Street, NE on the north, 13th and 14th Streets on the east, and the Southeast Freeway on the south, with an extension south of the Southeast Freeway bounded by 7th, M, 10th, and 11th Streets, SE. One of the oldest and most architecturally diverse neighborhoods in Washington, DC, it reflects the early growth of the city. It has a great variety of housing types, with elaborate structures next to simple, plain ones. Numerous commercial buildings, particularly along 8th Street and Pennsylvania Avenue, and religious and institutional structures, also contribute to the district. Architectural styles include Federal, Italianate, Second Empire, Romanesque, Queen Anne, and Classical Revival. The district includes approximately 8,000 primary contributing buildings dating from circa 1791 to 1945. The Capitol Hill Historic District was originally listed in the National Register in 1976.

3.5.2.4 L'Enfant Plan

Charles L'Enfant's Plan of Washington is the unique example in the United States of a Baroque city plan. The plan is closely related to the establishment of the United States and its federal capital. It was expanded through the urban improvements promoted by the McMillan Commission (1901), resulting in the most elegant example of City Beautiful concepts in the nation. The plan has influenced subsequent American city planning and other planned national capitals. The contributing elements of the plan consist of the streets, parks, and public reservations of the original L'Enfant city or McMillan Commission plan that have retain their historic integrity. G Street, SE, is a contributing element to the plan. It should be noted that the integrity of the plan is a function of spatial relationships rather than specific materials or urban design features.

3.6 Hazardous Materials and Waste

The US Marine Barracks do not use significant quantities of hazardous materials or generate significant quantities of hazardous waste. Routine maintenance products, such as paints or solvents, are stored and disposed of consistent with applicable regulations. The Commandant's House is a residential facility and, as such, not a generator of hazardous waste or a storage place for hazardous materials. However, due to its age, the front yard fence may contain lead-based paint.

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4 Environmental Consequences

This chapter describes the potential environmental impacts that would result from implementing the No Action Alternative and the Proposed Action Alternative.

4.1 Land Use

4.1.1 No Action Alternative

Under the No Action Alternative, no security enhancements would be provided for the Commandant's House. Existing conditions would continue. This would have no impact on land use.

4.1.2 Proposed Action Alternative

Implementation of the proposed action would result in a minor change in land use. Areas that are currently part of the brick sidewalk along the southern side of G Street, SE, between 8th and 9th Streets, SE, on either side of the Commandant's House, would be turned into landscaped gardens, within and outside the new fence line. This change from hardscape to softscape would be compatible with the site's surroundings, including the Commandant's and other nearby houses' existing front gardens, and would enhance the visual quality of the area. As such, it would have a small, positive impact on land use.

4.2 Relevant Plans and Design Guidelines

4.2.1 No Action Alternative

Under the No Action Alternative, existing conditions would continue. Maintenance of the existing fence in its current condition would be compatible with the relevant goals and objectives of existing plans and guidelines summarized in Section 3.2.

4.2.2 Proposed Action Alternative

The various planning goals and policies summarized in Section 3.2 generally aim to maintain and enhance those features that affect the quality of life of the District of Columbia's residents and workers as well as the experience of its visitors while allowing for the city's effective functioning and orderly growth as the federal capital of the United States and the heart of a major metropolitan area. Generally, the proposed security enhancements at the USMC Commandant's House would either be compatible with or would actively support these aims.

As can be inferred from Sections 2.3., 4.1.2, 4.3.2, and 4.4.2, the proposed action would be compatible with planning goals pertaining to land use, transportation, open space, and environmental protection. Enhancing security at the Commandant's House would support the ongoing effort to make federal sites more secure that accelerated in the wake of the September 11, 2001 terrorist attacks. By consulting with a wide range of interested parties, including NCPC, CFA, the DC HPO, and others as described in Section 4.5.2, the US Marine Corps has ensured that the proposed new fence's design is compatible with its surroundings and does not adversely affect the historic integrity and visual quality of the Commandant's House, the Marine Barracks, or the Capitol Hill neighborhood. Consultation with, and review of the design by, NCPC also ensures that the proposed enhancements are compatible with the guidelines for security improvements published by the agency. Based on these considerations, the proposed action is not expected to adversely affect any relevant planning goals or objectives.

4.3 Transportation

4.3.1 No Action Alternative

The No Action Alternative would have no impact on transportation. Existing conditions would continue.

4.3.2 Proposed Action Alternative

In the short term, construction of the proposed security enhancements would have a minor short-term adverse impact on transportation. Construction activities would result in additional vehicle trips to and from the site, as trucks bring in

construction materials and equipment, and take away debris. Workers also likely would drive to the site and park in the area. Curb-side parking along the southern side of G Street, SE, may be temporarily prohibited. However, given the limited scale and duration of the proposed construction activities, these impacts are expected to be minor. Implementation of the proposed action would also affect pedestrian traffic as at least part, and possibly all, of the sidewalk on the southern side of G Street, SE, between 8th and 9th Streets, SE, would be closed during construction activities. Because of the limited duration of these activities, this temporary adverse impact also would be minor.

In the long term, the proposed action would not affect vehicular traffic. The proposed extended fence system would enclose areas that are currently part of the public sidewalk. Current sidewalk width is 12 feet, but only 5 feet at the tree boxes. The proposed improvements would maintain sidewalk width and the four bollards that would be placed outside the fence along the edges of the block's two outermost tree boxes would not significantly impede pedestrian traffic.

Implementation of the proposed controlled parking measure would reduce the number of publicly available parking spots along G Street, SE between 8th and 9th Streets, SE by approximately seven. However, these spaces would remain available to local residents upon obtaining a permit from DDOT, to USMC personnel working at or visiting the Barracks, and to visitors to the Commandant's House, all of whom may be expected to already use parking space on this stretch of G Street or nearby. Therefore, no significant loss of street parking capacity would occur: people who would be authorized to park in front of the Commandant's House would have parked there anyway or would have parked nearby, in spaces that will then become available to other, non-authorized motorists.

The establishment of a planted garden at the east end of the block, in a area currently used for vehicle parking by Barracks personnel, may result in these few vehicles seeking parking on the streets and, therefore, in a slight increase in the demand for local parking. However, this impact would be small, affecting only a few vehicles (about half a dozen). It would not create a significant parking shortage in the neighborhood.

4.4 Air Quality

4.4.1 No Action Alternative

Under the No Action Alternative, existing conditions would continue. This would have no effect on air quality.

4.4.2 Proposed Action Alternative

The proposed action would have no long-term effect on air quality; it would result in no additional emissions of air pollutants.

4.4.2.1 Construction-Related Emissions

In the short term, the proposed action would have some minor construction-related adverse impacts. Fugitive dust would be generated by some construction operations, but water could be used to minimize the amount of dust becoming airborne. Additional emissions of air pollutants, including VOCs and NO_x, which are precursors of O₃, and PM_{2.5} and its precursor SO₂, would result from the use of diesel-powered construction equipment and the movement of trucks and vehicles. This increase would be minor and cease when construction activities are complete.

4.4.2.2 Clean Air Act Conformity

As part of this EA, a General Conformity Rule (GCR) applicability analysis was conducted according to the guidance provided by the USEPA in *Determining Conformity of General Federal Actions to State or Federal Implementation Plans* (November 30, 1993). Under the GCR, reasonably foreseeable emissions associated with all construction, demolition, and operational activities, both direct and indirect, must be quantified and compared to the annual *de minimis* levels applicable to those pollutants for which the project area is in nonattainment or maintenance. For an O₃ moderate nonattainment area in an O₃ transport region and PM_{2.5} nonattainment area, such as Washington, DC, the *de minimis* criteria are 100 tpy (91 metric tpy) for NO_x, PM_{2.5}, and SO₂; and 50 tpy for VOCs.

A detailed description of the GCR applicability analysis is provided in Appendix B. Table 4-1 summarizes the results of the analysis. It should be noted that the analysis was conducted based on an earlier version of the proposed action (Concept D, briefly described in Section 2.2.2.6) that included one guard

station only and a row of bollards on the sidewalk in front of the Commandant's House. However, because the elimination of the row of bollards from the proposed action can be expected to offset the construction of a second guard station for the purposes of the air emission analysis, and because of the very low emission levels calculated for Concept D, which could be multiplied a hundredfold and still remain well below the significance thresholds, the analysis described in Appendix B and summarized in this section remains valid for the purposes of determining the applicability of the GCR to the proposed action.

The estimates were calculated based on estimated usage hours and appropriate emission factors for each type of motorized equipment source. NO_x, VOCs, PM_{2.5}, and SO₂ emission factors were obtained from

- *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition* (USEPA, 2004) for heavy-duty diesel equipment emission factors.
- *Exhaust Emission Factors for Nonroad Engine Modeling: Compression-Ignition* (USEPA, 2005) for heavy-duty gasoline equipment emission factors.

Table 4-1
Total Estimated Annual Emission Levels

Emission Source	Pollutant (tons/year)			
	VOC	NO _x	PM _{2.5}	SO ₂
Diesel Equipment	0.05	0.49	0.04	0.01
<i>De Minimis Level</i>	50	100	100	100
10% 2009 Regional Emission Inventory	12,702	13,213	2,336	23,190

4.4.2.3 Conformity Applicability Determination

Under the GCR, the total annual air emissions resulting from proposed federal actions must be compared to the applicable *de minimis* levels on an annual basis. As defined by the GCR, if the emissions of a criteria pollutant (or its precursors) do not exceed the *de minimis* level, the federal action has minimal air quality impact and is determined to conform for the pollutant in question; no further analysis is necessary. Conversely, if the total direct and indirect emissions of a pollutant are above the

de minimis level, a formal general conformity determination is required for that pollutant.

Based on Table 4-1, the increases in annual emissions resulting from the proposed action are not projected to exceed the applicable *de minimis* levels. Furthermore, the project would not be regionally significant, as the resulting emissions would not make up ten percent or more of the regional emission inventory for NO_x, VOC, PM_{2.5}, and SO₂. Therefore, the air quality impacts of the proposed action would be minimal and a formal conformity determination is not required.

4.5 Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on any district, site, building, structure, or object listed, or eligible for listing, in the National Register of Historic Places. Implementing regulations for Section 106 established by the Advisory Council on Historic Preservation (ACHP) are contained in 36 CFR Part 800, Protection of Historic Properties, as amended. These regulations provide specific criteria (see Table 4-2) for identifying effects on historic properties. Effects to cultural resources listed, or eligible for listing, in the National Register of Historic Places are evaluated with regard to the Criteria of Adverse Effect set forth in 36 CFR 800.5(a)(1).

Furthermore, the NHPA also includes provisions that specifically address lead agencies' responsibilities when their activities involve NHLs. Section 110 (f) of NHPA outlines specific actions that these agencies must take when NHLs may be directly and adversely affected by an undertaking.

Table 4-2
Criteria of Adverse Effects

Criteria of Adverse Effect
<p>"An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a 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, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative" (36 CFR 800.5[a][1]).</p>
Examples of Adverse Effects
<p>Adverse effects on historic properties include, but are not limited to:</p> <ol style="list-style-type: none"> 1. Physical destruction of or damage to all or part of the property; 2. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's <i>Standards for the Treatment of Historic Properties</i> (36 CFR Part 68) and applicable guidelines; 3. Removal of the property from its historic location; 4. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; 5. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features; 6. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; 7. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance." <p>(36 CFR 800.5[a][2]).</p>

Agencies must, "to the maximum extent possible ... minimize harm" to NHLs affected by their undertakings.

4.5.1 No Action Alternative

Under the No Action Alternative, the existing fence would be left in its current condition; no perimeter security enhancements would be implemented. This would have no adverse effect on the historic Commandant's House, the Marine Barracks Historic District, the Capitol Hill Historic District, or the L'Enfant Plan. Future construction and maintenance activities at the Commandant's House and the Marine Barracks would continue to be planned and implemented in accordance with Section 106 and other applicable laws and regulations (see Section 3.5) and consistent with the recommendations and guidelines contained in the installation *Integrated Cultural Resources Management Plan* (ICRMP).

4.5.2 Proposed Action Alternative

The US Marine Corps has identified the proposed security enhancements at the Commandant's House as an undertaking with the potential to adversely affect the house, which is part of an NHL. The Area of Potential Effect (APE) was defined as shown in Figure 4-1.

Construction of the proposed enhancements could result in adverse effects to the Commandant's House and the other surroundings historic resources if the proposed new fence system were designed in a manner that diminishes the historic integrity of these resources. The factors that define historic integrity are summarized in Table 4-3.

Area of Potential Effect

U.S. Marine Corps
Quarters Six
801 G Street SE

Area of Potential Effect



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Table 4-3
Integrity Aspects that Could Be Affected by the Proposed Action

Aspect of Integrity	Property Attributes	Potential for Alteration?
Location	Must not have been moved.	No
Design	Must retain historic elements that create the form, plan, space, structure, and style of the property.	Yes
Setting	Setting must retain its historic character.	Yes
Materials	Must retain the key exterior materials dating from the period of its historic significance.	Yes
Workmanship	Methods of construction from its time of significance must be evident.	Yes
Feeling	Physical features must convey its historic character.	Yes
Association	Must be the actual place where a historic event or activity occurred and must be sufficiently intact to convey that relationship to an observer.	No

Source: National Park Service, 2002

To identify and avoid or mitigate any potential adverse effects, the US Marine Corps has designed the proposed enhancements consistent, to the maximum extent possible, with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR Part 68), in consultation with the agencies and organizations listed below, which were identified as consulting parties for the purposes of Section 106 consultation:

- DC State Historic Preservation Office (DC HPO)
- National Capital Planning Commission (NCPC)
- Commission of Fine Arts (CFA)
- National Park Service (NPS)
- Advisory Council on Historic Preservation
- Advisory Neighborhood Commission (ANC) 6B
- Capitol Hill Restoration Society (CHRS).
- DC Department of Transportation (DDOT)

As indicated in Section 2.2.1, the proposed action, as described in Section 2.1, is the result of an iterative consultation and review process through which alternatives the consulting parties thought would have adversely affected the integrity of the Commandant's House and were progressively eliminated or mitigated. A record of the Section 106 consultation process to date is included in Appendix A of this EA.

Through the process, significant changes were made to the proposed design: for instance, the project originally envisioned a new fence that would have been 7 feet 6 inches in height (Concept A); eventually, the height was reduced to the proposed 4 feet 8 inches, minimizing visual impacts. The reuse of the existing fence to create two new enclosed planted spaces and the construction of a decorative fence atop the wall along 8th Street, SE, were also adopted as mitigation measures during the consultation process. Another significant change was the almost complete elimination of the row of bollards once proposed to be installed on the sidewalk in front of the house (Concept D) and their replacement by controlled curb-side parking. Sensitive, unobtrusive design for the proposed guard booths also contributed to minimizing any adverse effects.

On February 25, 2010, following this process, which began in spring 2008, the DC HPO issued the following positive recommendation for the Historic Preservation Review Board (copy in Appendix A):

The proposal represents a respectful and balanced compromise between security and preservation goals. While guard booths would not typically be appropriate for public space, they are not an unusual or unexpected feature for a military installation and have been designed to be subordinate to both the site and the Commandant's House. Together with the modestly taller new fence, the restoration and reuse of the historic fence, replacement of chain link fencing with decorative metal, the clever parking management plan that greatly reduces the number of bollards, and the removal of paving and parking from public space, the project is a compatible solution that has been designed to significantly mitigate its potential adverse effects.

The proposed design was also approved by a vote of ANC-6B on February 23, 2010 (see Appendix A). Therefore, the Marine Corps does not expect the proposed action to result in an adverse effect to the Commandant's House; nor, consequently, would it result in an adverse effect to the US Marine Barracks Historic District, the Capitol Hill Historic District, or the L'Enfant Plan.

4.6 Hazardous Materials and Waste

4.6.1 No Action Alternative

Under the No Action Alternative, existing conditions would continue. This would have no effect on the use of hazardous materials or the production of hazardous waste, at the US Marine Barracks.

4.6.2 Proposed Action Alternative

Construction activities associated with the implementation of the proposed action may require the storage and use of small quantities of petroleum products and hazardous materials (such as, for example, oils and paints) at the site. It is expected that these materials would be handled with all necessary care to prevent spills and inadvertent contamination of stormwater runoff. Because the existing fence may contain lead-based paint, all due precautions would be taken when relocating it to avoid the release of paint fragments into the environment. If the fence is repainted, the Marine Corps would consider removing and properly disposing of any layers of lead-based paint that may be present provided it can be done without damaging the fence, resulting in no adverse impacts.

4.7 Cumulative Impacts

Cumulative impacts are impacts on the environment that result from "the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7).

The US Marine Barracks and Commandant's House are located in a long-established urban area where, everyday, multiple construction, demolition, renovation, or maintenance projects are being planned or implemented by public or private persons or entities. Due to the modest scale and limited impacts of the proposed action evaluated in this EA, its contribution to the cumulative impacts of these projects would be negligible. Because of the historic and fully developed character of the Marine Barracks and Commandant's House, recent, present, and future projects there consist mostly of routine maintenance and upgrade work.

Such work is presently ongoing at the Commandant's House. The project consists of interior and exterior renovations and upgrades. The interior work includes structural repairs of the first floor framing system; repairs to load-bearing masonry walls in the basement areas; complete replacement of the heating, ventilating, and air conditioning system including cooling towers, chillers, boiler, fan coil units, and controls; elevator replacement; and necessary electrical upgrades. The exterior work includes the removal of existing paint from all masonry; the repair or replacement of deteriorated brick and mortar; new foundation waterproofing and perimeter drainage systems; repair or replacement of the wood cornice; copper rain leader repairs; and painting all exterior brick and wood trim.

The only area where this project, in combination with the proposed action, could generate potential adverse effects pertains to cultural resources. However, all work was planned and will be performed in compliance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* (36 CFR Part 68) and Section 106 of the NHPA. The Section 106 consultation process for this renovation project was conducted in parallel with the consultation process for the proposed action evaluated in this EA and all potential adverse effects were identified and avoided or fully mitigated. Therefore, there would be no significant adverse cumulative impacts.

4.8 Conclusion

Based on the above findings, the US Marine Corps has concluded that the proposed action would have no significant adverse effects on the human environment. Therefore, an EIS is not needed and will not be prepared.

5. References

District of Columbia. 2004. *Inventory of Historic Sites*.

District of Columbia Department of Planning. *Comprehensive Plan for the National Capital. District Elements*.

District of Columbia Department of Transportation. 2006. *Capitol Hill Transportation Study*.

MAAR Associates, Inc. No date. *Integrated Cultural Resources Management Plan for US Marine Barracks, Washington, DC*.

National Capital Planning Commission. 2004. *National Capital Urban Design and Security Plan*.

National Capital Planning Commission. 2004. *Comprehensive Plan for the National Capital. Federal Elements*.

Naval Facilities Engineering Command EFA Chesapeake. 2001. *2001 Master Plan Update. Marine Barracks, 8th and I Streets, Southeast, Washington, DC. Final Submittal*.

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6. Preparers

This environmental assessment was prepared by:

AECOM

675 N. Washington Street, Suite 300
Alexandria, VA 22314

Key personnel included:

Laurent Cartayrade, Project Manager: 10 years of experience in cultural resources and environmental impact studies. University of Paris IV-Sorbonne, 1984, BA; University of Maryland-College Park, 1991, MA, History; 1997, PhD, History.

Andrew Foley, Environmental Planner: 8 years of experience in ecology; 2 year of experience in environmental planning. Eastern Michigan University, 2002, BS, Aquatic and Terrestrial Ecosystems; Eastern Michigan University, 2007, MS, Ecology and Organismal Biology.

Cara Schefer, Environmental Planner: 6 years of experience in NEPA environmental impact assessment, land use planning, socioeconomic impact analyses, and community relations. College of William and Mary, 1987, BA, Sociology; University of Virginia, 1992, MP, Urban and Environmental Planning.

Katherine Weber, GIS/Cartography: 6 years of experience in mapping using GIS, ArcView, ArcGIS, and PGS. Mary Washington College, 2002, BA, Geography.

Fang Yang, Senior Air Quality Engineer: 20 years of experience preparing air quality and noise portions of environmental impact assessments for both stationary and mobile source impacts. Fudan University, 1982, BS, Physics; New York University, 1988, MS, Atmospheric Science.

Bell Architects, PC
(Prime Consultant: Design and Section 106
Consultation)

Scott Knight: Bell Architects, Project Manager

APPENDIX A

Section 106 Documentation

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USMC Quarters Six Repairs and Maintenance/Physical Security Upgrades

ASSESSMENT OF EFFECT

1. Identification and evaluation

National Register listed or eligible: The property is located in the Capitol Hill Historic District. The property (United States Marine Barracks and Commandant's House) is individually listed as a National Historic Landmark in the National Register of Historic Places (05/11/1976). As such the District of Columbia Historic Preservation Officer (HPO) and the National Park Service (NPS) would be considered consulting parties for any review.

Contributing Elements and Characteristics: Based on the National Register Criteria A characteristics of the property are considered as contributing to its historic significance as identified in the Environmental Assessment prepared by Earth Tech. This includes the complete facility including the perimeter wall and Quarters Six House. The 2½ story Federal style house has received several additions/ alterations since being designed by George Hadfield, all of them are contributing. The most significant being the mansard roof. Other contributing elements include the garden and low iron fence in public space as is typical in the Capitol Hill Historic District.

Summary of Proposed Undertaking: The proposed undertaking is identified in two major activities: 1) rehabilitation of Quarters Six residential building; and 2) site modifications for improvements for Anti-Terrorist Force Protection.

1) Quarters Six rehabilitation scope of work addresses interior structural repairs of the first floor framing system, repair load bearing masonry walls within the basement areas, complete replacement of heating, ventilating and air conditioning system including cooling towers, chillers, boiler, fan coil units, HVAC controls, and power equipment, new elevator replacement, and necessary electrical upgrades. Exterior restoration and repairs include removal of the existing paint from all masonry, repair and/or replacement of deteriorated brick and mortar, new foundation waterproofing and perimeter drainage systems, repair and/or replacement of wood cornice, necessary copper rain leader repairs, and finish painting of all exterior brick and wood trim.

All the work will be done in compliance with the Secretary of Interior's Standards for Rehabilitation. In addition all existing vegetation and landscape features will be surveyed, quantified, and reviewed with an arborist to determine salvage or replacement requirements.

2) The elements include a new eight foot (8') tall fence to replace the existing, two new guard booths and vehicle barriers (bollards and reinforced planters). The design approach includes the Section 106 process prior to any implementation of the plan's provisions, with the intent of identifying and avoiding, minimizing or mitigating adverse effects to historic resources.

Actions identified in the scope of work upgrading the perimeter security along G Street SE, in front of the Marine Commandant's House. To meet criteria established by the Navy for anti-climb fence and passive vehicle barrier. These actions would require the replacement of sidewalk paving, curbs, and street lighting. Such actions fall within the purview of the Secretary of Interior's Standards for the Treatment of Historic Properties, 1995 (36CFR Part 68).

Area of Potential Effect: This area is identified in Appendix 1 and includes the historic structure as well as the property's setting (landscape). The area of potential effect is bounded to the north by the building face (property line) of properties facing G Street SE; to the south by the rear of the Quarters Six residence; to the east by the property lines along the east side of 9th Street SE; and to the west by the property line along the west side of 8th Street SE.

USMC Quarters Six Repairs and Maintenance/Physical Security Upgrades

ASSESSMENT OF EFFECT

2. Assessing effects

The proposed undertaking identified above will affect historic resources within the Area of Potential Effect (see Appendices 1). Some of the actions involve demolition of contributing elements of the property's historic character, which by definition constitutes an adverse effect.

Adverse Effect: 2) The scope for site modifications would have an adverse effect. By definition, demolition of existing historic fabric (iron fence) and environment contributing to the property's historic significance would be an adverse effect, which would need to be mitigated.

Potential Adverse Effect: The Secretary of Interior's Standards for Rehabilitation provide that the historic character of a property be retained and preserved. "Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." If the actions follow the Secretary of Interior's Standards for the Treatment of Historic Properties, there would be no adverse effect on historic characteristics of the property.

1) The scope for rehabilitation of Quarters Six includes proposed roof-mounted solar photo-voltaic panels. These would have a potential adverse effect to the setting, if visible from the street or parade grounds. The cooling tower replacement would have a potential adverse effect to the setting, if visible from the street or parade grounds.

2) Guard booths and bollard vehicle barriers will have a minor adverse effect on the setting. The new elements would need to conform to the Secretary of Interior's Standards for the Treatment of Historic Properties, which provide that new work of this type "will be compatible with the historic materials, features, size, scale and proportion and massing to protect the integrity of the property and its environment."

No Adverse Effect: 1) The scope for rehabilitation of Quarters Six residential building is considered to have no adverse effect, if the actions follow the Secretary of Interior's Standards for the Treatment of Historic Properties; **2)** Proposed expansion of planted areas flanking the east and west sides of the existing garden area would have no adverse effect to the historic district or the historic landmark. Replacement of sidewalk paving, curbs, street lighting, landscaping and street trees would have no adverse effect.

3. Consultation, Avoidance, Minimization and Mitigation

The National Historic Preservation Act requires any adverse effect to historic property, which is not avoided or minimized, to be mitigated and for the agency to consult with the HPO. The Navy can independently consider other alternatives that reduce or eliminate any adverse effect before consulting with the HPO as required by Section 106. If the Navy chooses to submit a finding of adverse effect pursuant to 800.5(d)(2), then the Navy shall consult further with the HPO and other consulting parties to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties. If there is a finding of adverse effect, the Advisory Council on Historic Preservation (Council) must be given an opportunity to comment, prior to executing a Memorandum of Agreement (MOA).

USMC Quarters Six Repairs and Maintenance/Physical Security Upgrades

ASSESSMENT OF EFFECT

Consultation: Consultation has included the following organizations and groups: DC Historic Preservation Office, US Commission of Fine Arts, National Capitol Planning Commission, DC Department of Transportation, Capitol Hill Restoration Society, Advisory Neighborhood Commission 6B, and miscellaneous neighbors of surrounding area. Views of these organizations have been considered and the proposed action significantly modified in response to public commentary. The views are represented in the attached meeting minutes. As part of the consultation process, the agency has provided alternative designs and adjustments to these alternatives. The latest design represents a consensus solution that minimizes and mitigates adverse effect as summarized below.

Avoidance: **1)** Eliminate roof-mounted solar panels.

Minimization: **1)** Install a replacement cooling tower in the same location and with a similar size as the existing, not visible from public space or the parade grounds; **2)** Provide for controlled parking in lieu of bollards along the G Street curb. Maximize spacing of bollards and reduce height of bollards in the sidewalk area and new garden areas. Reduce height of new fence from eight feet (8') tall to four feet eight inches (4'-8") tall. Provide new fence that is compatible with the existing, but subtly distinct from the historic fence. Locate guard booths in new garden areas as remotely as practicable from the historic house.

Mitigation: **2)** Salvage, rehabilitate and relocate the existing iron fence as a reversible action, in accordance with The Secretary of Interior's Standards for Rehabilitation. Replace chain link fence with compatible iron fence at top of Quarters Six's garden wall facing Eighth Street. Provide an additional street tree at the east end of the block.

4. The Council's opportunity to comment

At the heart of Section 106 review is the comment process. This would take the form of consultation among the US Navy, US Marine Corps, the Historic Preservation Officer and the Advisory Council staff. Other interested parties, whom may be invited to participate, include Advisory Neighborhood Commission 6B (ANC 6B), Capitol Hill Restoration Society (CHRS) US Commission of Fine Arts (CFA), the National Park Service (NPS) and DC Department of Transportation (DDOT). During consultation, parties attempt to reach agreement on measures to avoid, minimize or mitigate the adverse effects of the agency's undertaking.

Memoranda of Agreement are similar to contracts, and courts defer to the interpretation of the signatories in questions regarding the meaning of the agreement's language. Where an MOA has been signed, it must govern the undertaking and all its parts. If a Federal agency consults with the Council and SHPO and agrees to certain mitigation measures by incorporating them into permit conditions, but does not execute an MOA, courts have found substantial compliance with the Council's regulations and the intent of NHPA fulfilled.

It is recommended, however, that a MOA be executed as part of the consultation process. This document should identify the pertinent aspects of agreements reached for mitigation of adverse effect and outline rights, responsibilities and procedures to fulfill the intent of the agreement, in the event that disputes arise.

5. Effect of the Council's comments

Although Section 106 and the Council's regulations impose important procedural duties on Federal agencies, the Council is purely an advisory body; it has no authority to impose substantive requirements on an agency. When an agency enters into a MOA, an enforceable legal document, it agrees to implement the agreement's terms. Similarly, where an agency agrees to impose certain conditions on

USMC Quarters Six Repairs and Maintenance/Physical Security Upgrades **ASSESSMENT OF EFFECT**

permits and licenses, such conditions must be upheld. If the agency obtains the Council's comments upon termination or foreclosure of the consultation process, it has the discretion not to follow them. However, an agency's actions are reviewable under the Administrative Procedure Act, a statute which prohibits agencies from acting arbitrarily or capriciously in making decisions.

6. Documentation standards

Following, for reference purposes, are the documentation standards required by Section 800.11 of the National Historic Preservation Act (NHPA), as amended, for the finding of whether there will be adverse effect or not:

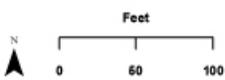
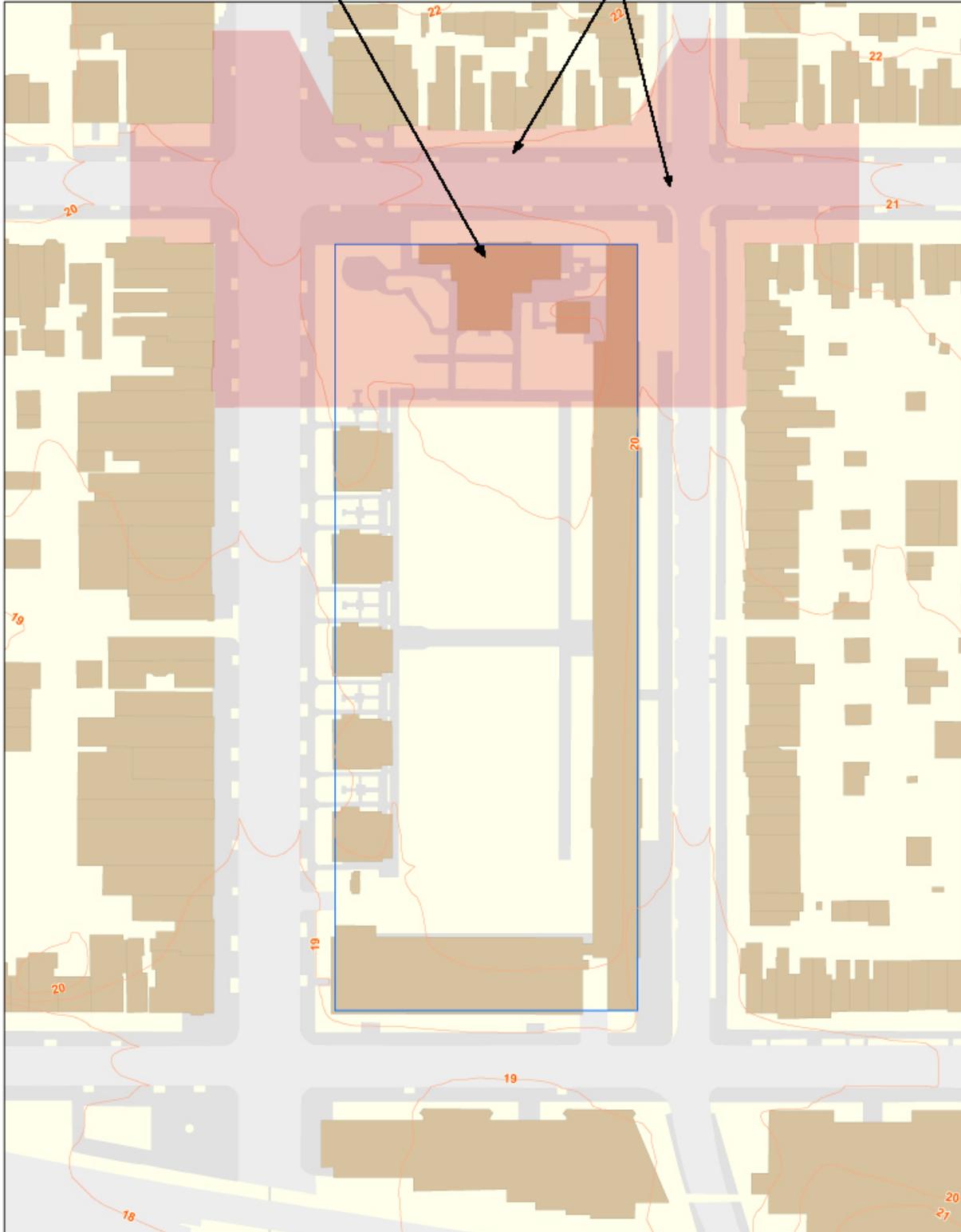
- (e) Finding of no adverse effect or adverse effect. Documentation shall include:
 - (1) A description of the undertaking, specifying the Federal involvement, and its area of potential effects, including photographs, maps, and drawings, as necessary;
 - (2) A description of the steps taken to identify historic properties;
 - (3) A description of the affected historic properties, including information on the characteristics that qualify them for the National Register;
 - (4) A description of the undertaking's effects on historic properties;
 - (5) An explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize or mitigate adverse effects; and
 - (6) Copies or summaries of any views provided by consulting parties and the public.

Attachments:

- Appendix 1: Area of Potential Effect (APE)
- Appendix 2: Photographs and Drawings
- Appendix 3: Consultation meeting minutes
- Appendix 4: National Register Nomination Form

**U.S. Marine Corps
Quarters Six
801 G Street SE**

Area of Potential Effect



**District of Columbia
Square 0927**

**Area of Potential
Effect**



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U.S.MARINE COMMANDANT'S HOUSE
Frontal View From G Street SE, 1970's Photo



U.S. MARINE COMMANDANT'S HOUSE
Oblique View From G Street SE, Date Unknown



Photo # 1 - View of Site from G & Ninth Street Looking Southwest



Photo # 2 - Existing View of Site from G & Eighth Street Looking Southeast



Photo # 3 - Neighborhood View Across G Street from Northwest Corner of Site



Photo # 4 - Neighborhood View Across G Street from Norhteast Corner of Site



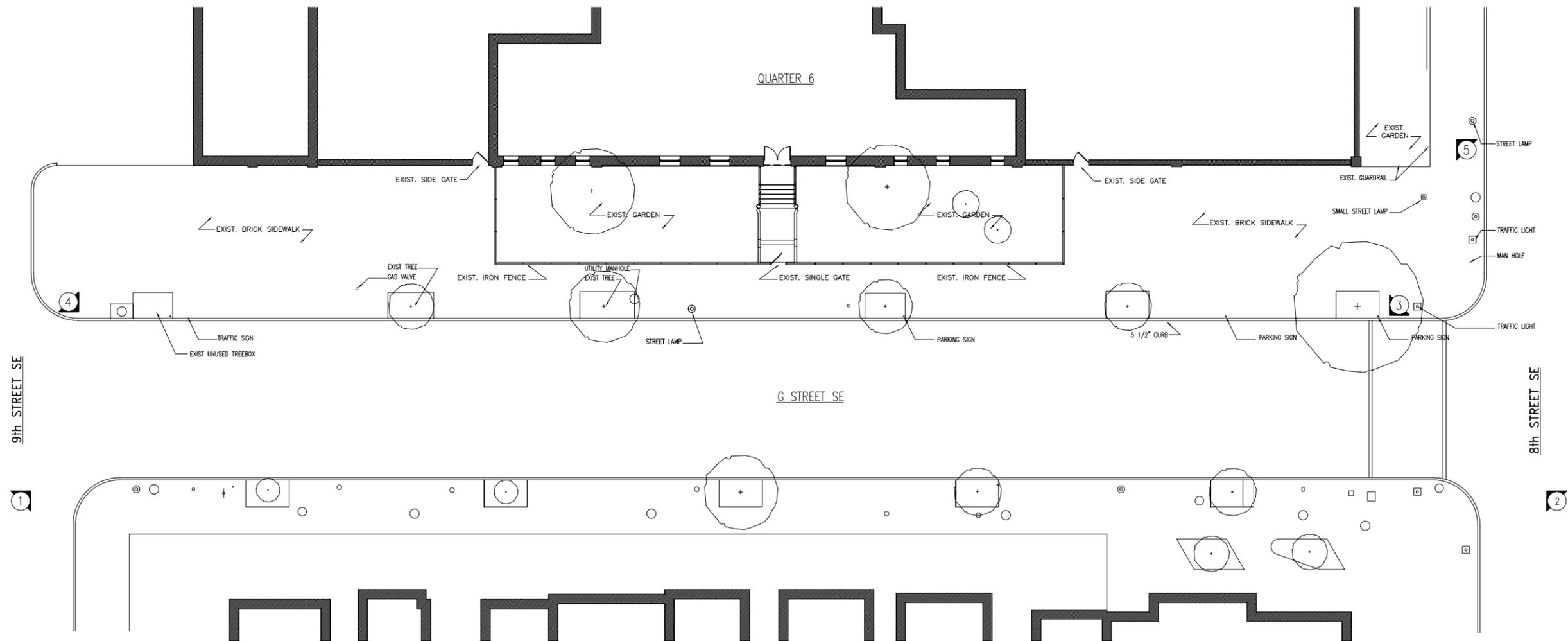
Photo # 5 - View Along Eighth Street of Existing Masonry Wall



Photo # 6 - Existing Gate & Fence Along Eighth Street

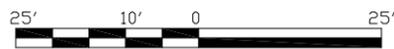


EXISTING ELEVATION



EXISTING SITE PLAN

Scale: 1"=25'-0"



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Marine Commandant's Fence

801 G Street SE, Washington, DC

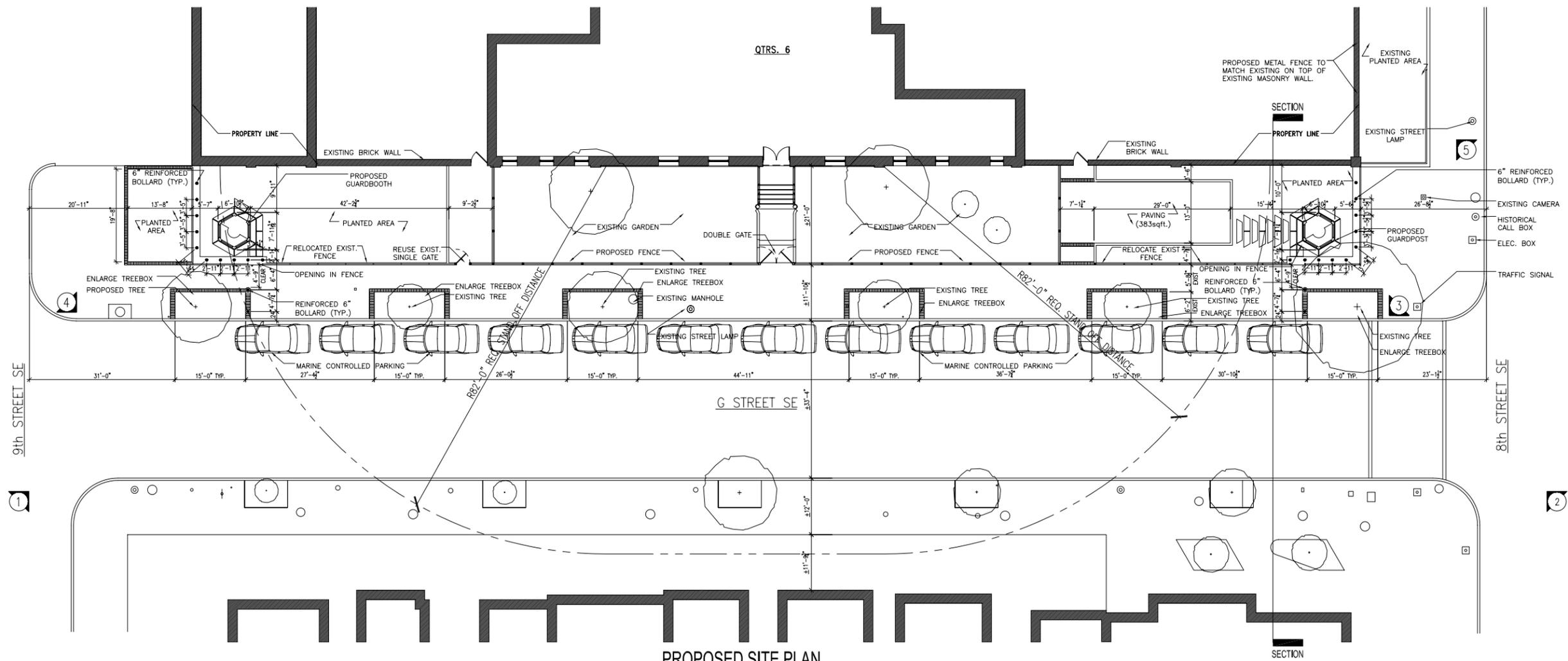
090-023

January 27, 2010

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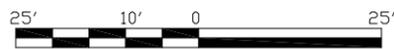


PROPOSED ELEVATION



PROPOSED SITE PLAN
DESIGN "G"

Scale: 1"=25'-0"



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Marine Commandant's Fence 090-023

801 G Street SE, Washington, DC

January 27, 2010

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PROPOSED ELEVATION



PROPOSED LANDSCAPE PLAN

Scale: N.T.S.

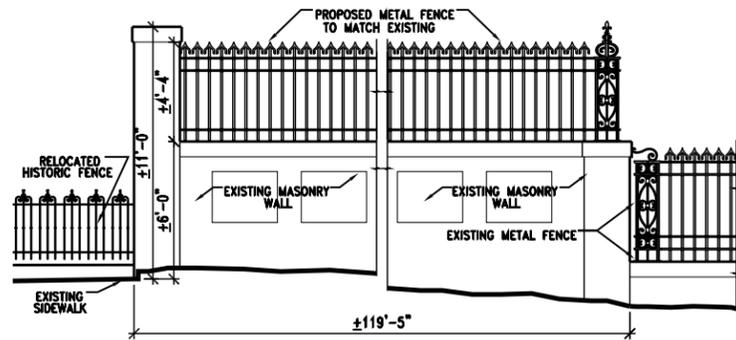


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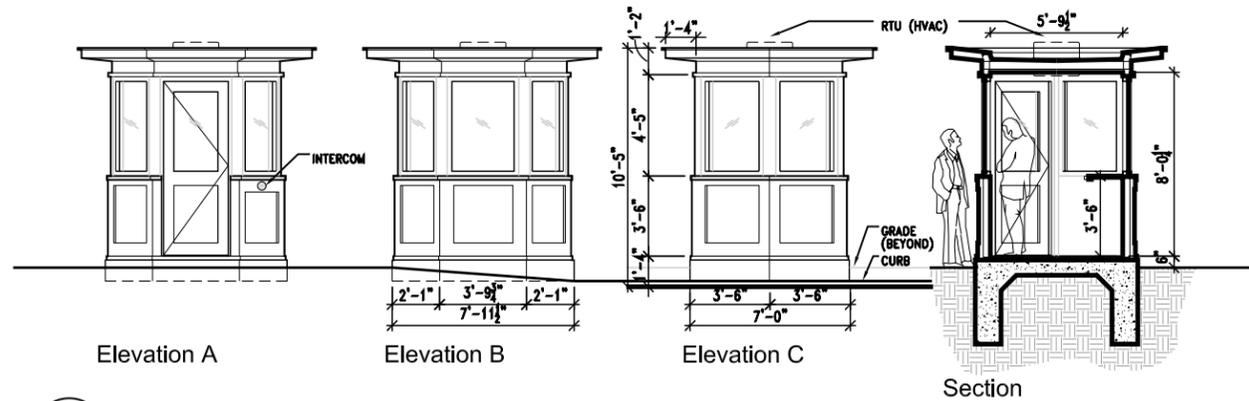


Proposed View of Northwest Corner at 8th & G Street SE

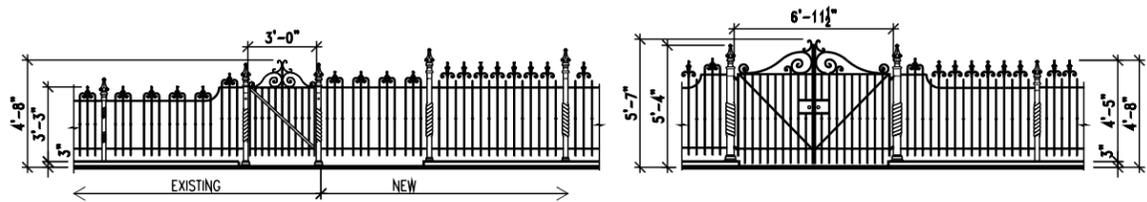
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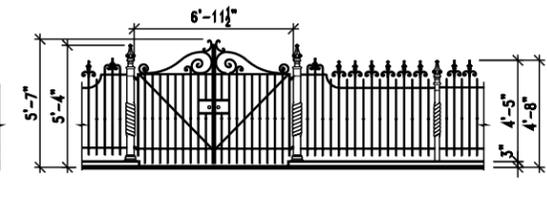
6 PROPOSED FENCE
SCALE: 1/8" = 1'-0"



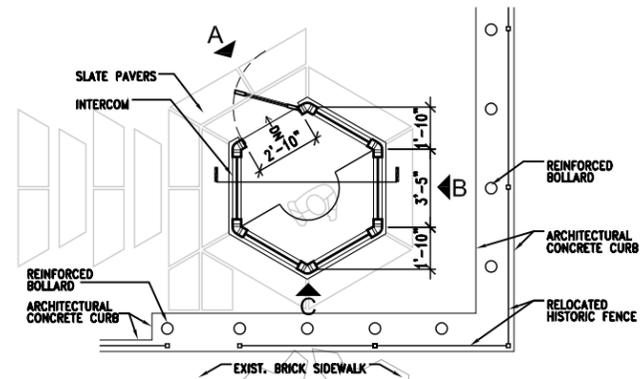
4 PROPOSED GUARD BOOTH ELEVATIONS
SCALE: 1/8" = 1'-0"



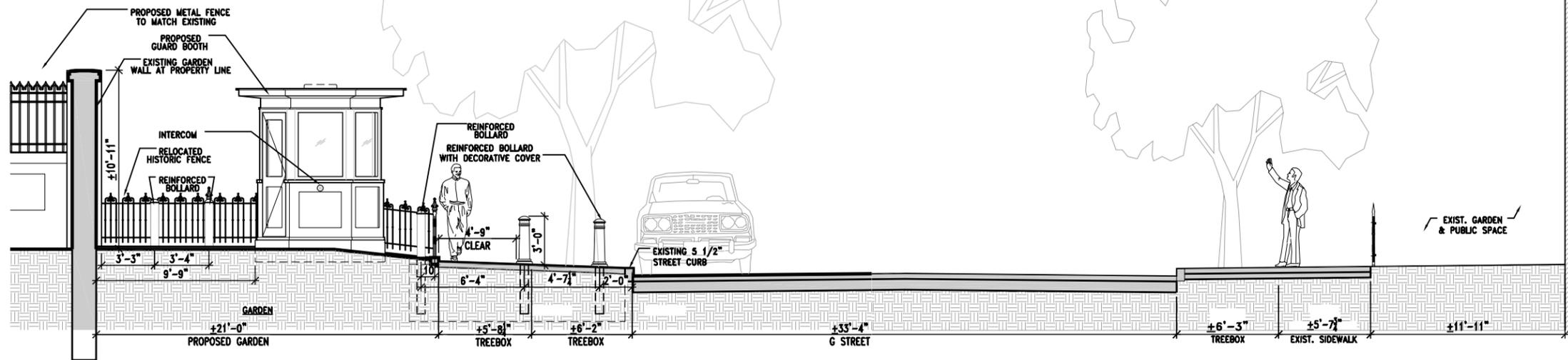
2 TRANSITION BETWEEN EXISTING AND PROPOSED
SCALE: 1/8" = 1'-0"



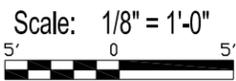
3 PROPOSED FENCE
SCALE: 1/8" = 1'-0"



5 PROPOSED GUARD BOOTH PLAN
SCALE: 1/8" = 1'-0"

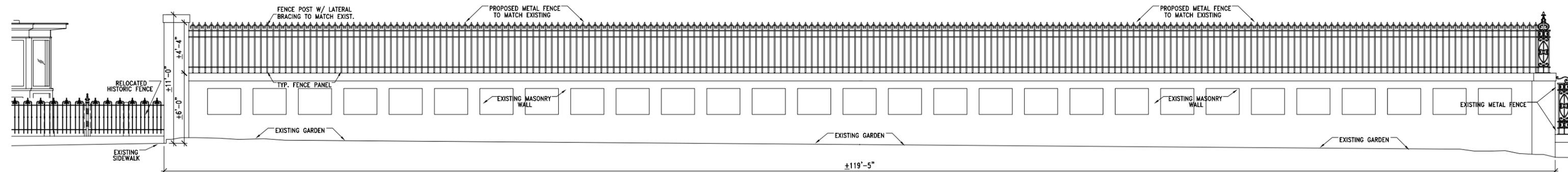


1 PROPOSED GARDEN - STREET SECTION
SCALE: 1/8" = 1'-0"

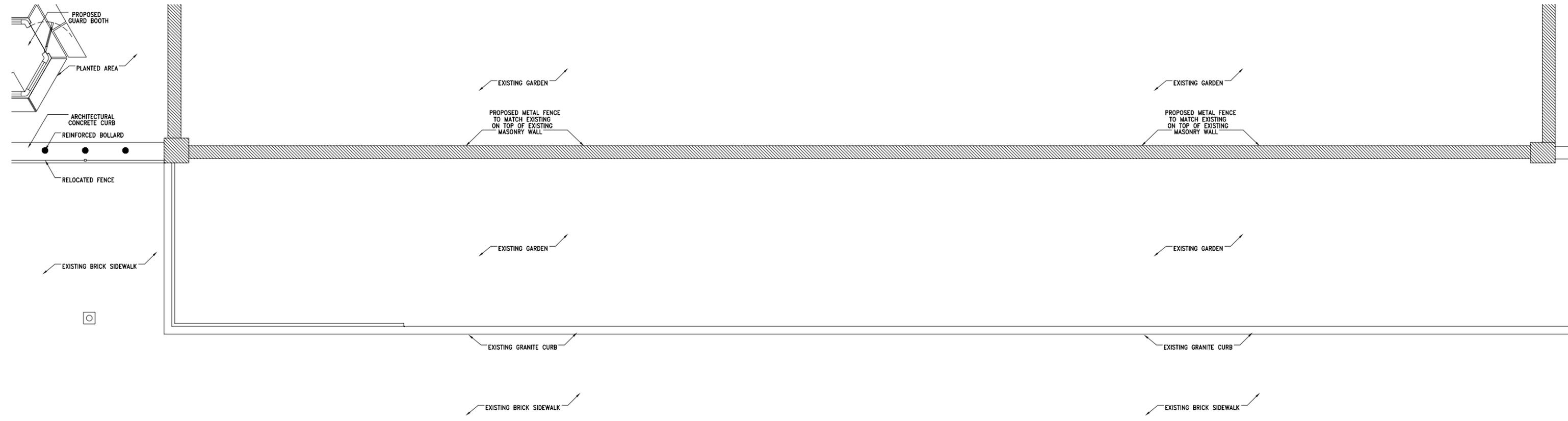


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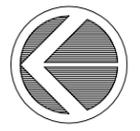


1 **PROPOSED EIGHTH STREET FENCE**
SCALE: 1/8" = 1'-0"



2 **EIGHT STREET PLAN**
SCALE: 1/8" = 1'-0"

G STREET SE



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Appendix 3:
Consultation Meeting Minutes
USMC – Quarter 6
Fence upgrades

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USMC Commandant Security Fence

801 G Street SE, Washington, DC

Scheme History

No.	Date	Design Type	Design Description	Reviewing Group
1	4/18/2007	A	This Scheme replaces the existing fence with a new masonry and iron fence on the existing brick sidewalk that is inspired by the fence and gates design along the 8th Street.	NCPC, DCHPO
2	4/20/2007	A		CFA
3	4/18/2008	X	Existing conditions drawing includes Existing plan, section showing existing iron fence and images of the existing fence	NCPC, DCHPO, CHRS, ANC6B, City Council, CFA
4		A		
5		B	This scheme places the existing fence on a new reinforced wall spanning the entire yard's fence line. The existing fence will be restored, bollards will be added for vehicular barrier.	
6		B'	This scheme is similar to scheme B, but proposes to relocate two garden step outside of the fence line. The reinforcing wall is made taller from 7" to 1'-0"	
7		C	This scheme places bollards around the entire 800 block of G street. The existing fence is retained.	
8		C'	This scheme places bollards around the site. At the corners, they are replaced with planters.	
9		X		
10		X'	Existing elevation	
11	5/29/2008	D	In this scheme, a side garden is introduced on either side of commandant's house, which is surrounded by existing relocated fence. Each garden has a guardpost and a cable retention system behind the fence.	DCHPO
12	6/2/2008	D		CHRS, ANC6B, ANC6C
13	6/3/2008	D		ANC6B
14	7/17/2008	D'	Similar to scheme D, existing single gate has been reused and a transition fence panel has been introduced between main fence area and side garden.	Community Meeting

15	1/8/2009	E	This scheme follows the basic design of scheme D. However, the guardposts have been moved outside the gardens and cable retention system have been removed. Tree boxes are made bigger and additional bollards are introduced along G street and in the gardens	DCHPO
16	8/31/2009	E'	The garden on the west side is made smaller increasing the existing paving area. The proposed guardpost design has been changed to a octagon. Tree boxes are made smaller and bollards are moved outside the side gardens	CHRS
17	9/1/2009	E'		ANC
18	10/5/2009	F	This scheme is similar to scheme C, guardpost are pulled back inside the extended gardens . Guardpost design is similar to scheme E with roof modifications. Bollards are introduced back in the side gardens in a staggered configuration.	CHRS
19	10/6/2009	F		ANC
20	10/28/2009	F		CFA, NCPC, DCHPO
21	10/29/2009	F		DDOT
22	1/11/2010	G	This scheme restores and relocates the existing fence on a new concrete curb enclosing to new garden areas to the east and west of its current location. A new 4'-8" tall fence of similar design replaces the existing fences enlcoses the existing yard. Bollards will be added allong the east and western ends running parellel to 8th and 9th Streets. Guard booths are located behind the historic fence near the corners of 8th and 9th Streets.	CFA, NCPC, DCHPO, DDOT
23	2/2/2010	G		ANC

meeting minutes

Project:	USMC Commandant Security Fence	location:	Center House Marine Barracks
Project #:	090-022	Date:	4/18/08
by:	Scott Knight	Time:	1030-1230
attendees:	See attached sign in sheet		

The meeting was held to discuss how to improve security at the USMC Commandant's Residence. A tour of the house was conducted by Mrs. Conway prior to the meeting.

Threats

- Vehicle & Pedestrian
- NCIS standard for stand-off distance could never be met at this location without closing G St.
- The other extreme would be to do nothing.
- A security-focused structural consultant is involved to help guide solutions, based on the threats and limitations established by DoD.

Solutions

- Resolve the two threats independently, vehicle barrier at street pedestrian barrier at the fence line or just inside the sidewalk area used by the public
- Provide protection and the impression that this site is more protected than another target, thereby shifting potential attacks away from this site.
- Address environmental impact and historic preservation effects. Mitigate any adverse effects.

Issues

- Existing fence over 100 years old. Replacement of the fence is at odds with historic preservation and would be considered an adverse effect.
- Concerns over aesthetics.
- Existing house and adjacent garden walls are constructed of un-reinforced masonry.
- Residence is very close to garden fence and street. Approximately 33 feet from the curb.

Scenarios

- Created to cover a number of options.
- Presented to get feedback, pro or con from all parties, through an open dialogue.
- Understand that their will not be a conscience, everyone has their own priorities, which potential conflict .

Feed back

- Move people out of the building to lessen the threat, the building doesn't need to be occupied to retain its historic significance. Example Mark Twain House. (Lyndstrom)

- The house has been continuously occupied by the Marine Commandant since its construction. Marines have a long history in the building and plan to continue the tradition. There is very little support from the Marines for moving out of the house or with closing G Street. (Donovan)
- Provide soft protection, having a Marine guard on the corner. Their presence creates a deterrent. There has been a guard post for a few months just east of the house, which provides a visual deterrent.
 - Variance to closing the street. (Bell)
- Fence design to deter climbing over will still allow for climbing as designed. (Lyndstrom)
 - No fence can completely eliminate climbing. The time involved to scale the fence allows for the posted Marine to react to the threat.
- What is the distance between the building and street. (Lyndstrom)
 - Thirty-three feet
 - At Oklahoma City Courthouse, the vehicle that delivered the bomb was 40' away. (Weinstein)
- As barricade perimeter is pushed out the threat gets shifted across the street or towards the adjoining properties. (Lynstrom)
 - Threat would find another target. (Donovan)
- Thoughts on bollards or other vehicle deterrence along perimeter of property. (Bell)
 - Size of bollards, be smaller diameter.
 - Smaller diameter, hitching post type is what Mrs. Conway would like to see. (Donovan)
 - Variety of solutions, potential change at Commandant's Residence. (Simons)
 - Continuous bollards not a good solution, example 15th Street at the Treasury building. (Lynstrom)
 - Keep sidewalk open, planters block the sidewalk in Scenario C' (Jarboe)
 - Standard designed objects are too large, and not complementary to the area. (Donovan)
- Need to keep existing fence (Brockett)
- Will security be extended to barracks? (Lyndstrom)
 - No there is no way to provide stand off distance, at future time that may change with new command. (Donovan)
- Streets being considered for closing, extend beyond G to include 9th?
 - Protection is for the Commandant's Residence, 9th street is not being considered. (Donovan)
- Keep the fence and change the gate to a double wide one. (Bell)
- Thoughts on fence raise and options, fence with base, new taller fence. (Donovan)
 - Fence to slow people down. (Bell)
 - Appearance of rear side of fence wall, shall be brick faced. (Lyndstrom)
 - Wall is not a vehicle deterrent so can be solid brick. (Bell)
 - Show of hands support keeping historic fence about 50%, no support for new fence.
 - SHPO will strongly object to removal of fence. Cause an adverse effect. (Brockett)
 - Need a really good case for removal. (Lyndstrom)
 - Move to a different location on the block. (Simons?)
 - Height of current fence is appropriate for historic residential district where the property is located. Raising the fence gives it a different scale, whether new fence or existing raised on a wall, that does not relate to the residential character. (Sullivan)
 - Add a secondary gate inside at the steps. (Metzger)
 - We can look at the option, but do not see it being architectural appropriate. (Donovan)
 - Need more information on the design of the fence before being able to evaluate it. These are just pictures. (Lyndstrom)
 - That is correct, we are trying to give direction to BELL Architects. (Donovan)
- B' shows moving stairs to the fence line. (Bell)
 - This could cause a tripping hazard. (Metzger)

Alternatives

- Cobble stone paving on G Street, will slow traffic. (Metzger) Full street or raised tables at pedestrian cross walks.
 - Increased noise, and vibration in houses. Neighbors will not like it. (Lyndstrom)

- Location of bollards along 8th Street could be moved to the planting area edge next to the sidewalk to avoid the need for pedestrians to cross through bollards. (Lyndstrom)
- Increase garden area toward the east and west from the existing garden in front of the Commandant's Residence. (Metzger)
 - West side has parking, but east side is near a bus stop at the corner, and more heavily used by pedestrians. Change dynamics. (Jarobe)
- Have a collapsible pit ('tiger trap') that would allow pedestrian and light vehicles to cross, but larger, heavier vehicles would fall into. (Brockett)
 - Tiger traps have been discredited by some as a method of protection, especially without adequate standoff distance. (Bell)
- Move the location of Commandant's office.
 - Maximum expense amount on house limited without Congressional approval. Distance of move is small distance, and have minimum affect on security. (Donovan)
- Thorny or dense planting to deter climbing over existing fence, may be as much of a deterrent as a taller fence.(Weinstein)
 - *Pyracantha coccinea* M. Roem. (scarlet firethorn) is thorny possibility and could be a very good deterrent. (Metzger)
- Increase planting areas to corners of the block. (Brockett)
 - This area has always been unplanted, according to imagery of the area. Do not know the significance of this. Would it be a problem to plant these areas or not? (Simons)
 - Staging areas associated with the gates. Will need to consider the function of the areas. (Lyndstrom?)
 - Marines greet guests at the G Street entrance, does not require a large staging area. (Donovan?)
 - Bring security bollards in to this garden area. (?)

Other Considerations

- Fire trucks, heavily use G Street to respond to calls – Potomac Village. Need to coordinate with Fire Department on changing pavement or raised tables.
- Historic Call Boxes are not to be tampered with. (Metzger)

Process

- Currently look at conceptual plans.
- Bell Architects will compile information into a hybrid solution. (Donovan)
- Regroup for another offline meeting to discuss before submitting for formal review. All agreed that this meeting was a very successful and helpful beginning for the consultation process.
- Goal is to move forward with a formal submittal late spring early summer. (Bell)
- We should reach a mutual agreement overall before going to individual review bodies. (Donovan)
- Get together in a month, some time in May. (Donovan)
- Environmental Assessment needs to proceed concurrently.
- The vehicular impact and threat assessment needs to be shared, with classified material removed, so the level of protection required can be understood by all.

Capitol Hill Restoration Society – June 2008

1. **801 G Street SE** – Sometimes this seems to be an exercise in frustration as we are not sure what threats the Marines wish to guard against – in theory all threats, we're sure, but given the location on a busy street this is not a reality.
 - The passersby who walk up the stairs and into the house? -- Make the latch on the front gate more difficult to open and the front door with an automatic close/lock. (After all, the residents can always get in by another door) This is a threat that can be easily and unobtrusively managed.
 - The pedestrian strapped with explosives who vaults the low fence and sets them off or who tosses a backpack full of explosives over the fence? It probably won't make any difference about height of fence because an object can always be thrown over a fence, unless maybe it's 12' high.
 - Explosive-filled car or truck that makes a run at the house? Probably wouldn't come directly to the front of house and then turn in but would come in from the corners.
 - Our historic preservation viewpoint:
 1. We prefer to keep the historic fence at the present location. A wide hedge behind the fence with a cable intervention system (disguised by the fence and hedge) should be as effective as bollards and a 5' tall fence. It is very pedestrian unfriendly to walk between a line of bollards and a 5' tall fence.
 2. The new extension of the public green space is a true benefit and the committee is enthusiastically in support of that. Not only does it get rid of massive amounts of hardscape and parked vehicles but it also is in keeping with the historic district. The 5'-tall new fence (backed up by hedge and cable retention) could be installed here as these may be the areas most vulnerable to vehicular assault. (The committee thought that the staggered height of the pickets was a good detail as it visually opened up the taller fence that is not pedestrian friendly.)
 3. The committee was not in favor of bollards in front of the house; there was less discussion about the bollard and chain approach on 8th Street because that is a design that has precedent in many of our vest-pocket parks.
 4. The guard posts (no known design) was received favorably in concept as many felt the personal presence would be the most effective deterrent. Design would have to be carefully considered.
 5. New fence on top of 8th Street wall was fine – chain link is not appropriate.
 6. Any fences installed in front of the house should not be in a continuous brick base as that is a very suburban concept; there should be individual anchors for the posts (see Christ Church fence).
 7. What does “reinforce tree box” mean? What does it look like?

meeting minutes

Project: USMC Commandant Security Fence **location:** 921 Pennsylvania Ave. SE

Project #: 090-022 **Date:** 06/03/08

by: Scott Knight **Time:** 8:00-9:00pm

attendees: David Bell, BELL Architects
Scott Knight, BELL Architects
Harry Martin, NAVFAC
Francis Campbell, ANC6B
Kenan Jarboe, ANC6B
Kristen Oldenburg, ANC6B
Wilbert Hill, ANC6B
Carol Green, ANC6B
Julie Olson, ANC6B
David Garrison, ANC6B
Bert Randolph, ANC6B

The meeting was held to discuss the single revised concept for improved security at the USMC Commandant's Residence. There was a miss communication with the ANC regarding being placed on the agenda. Since the public was not notified ahead of time, it was presented informally.

- The ANC requested a meeting with the neighbors within 200' of the residence and the Marines, before the project is formally reviewed.
 - Kristen Oldenburg & Harry Martin will coordinate and schedule a meeting.
- The ANC request more detailed information on the guard posts, bollards, and tree box fence, for their review and discussion.
- They are supportive of having guard posts, and prefer them over having a tall fence around the residence.
- They are not supportive of having bollards along the front of the house as shown. They prefer removing them and reinforcing the fence.
 - The security consultant would need to evaluate the affect of reducing the stand off distance.

meeting minutes

Project:	Qtrs. 6 Security Upgrades	location:	801 North Capitol Street, NE Suite 3000
Project #:	090-022	Date:	01/08/09
by:	Scott Knight	Time:	1:30-2:30pm
attendees:	David Bell, BELL Architects Scott Knight, BELL Architects Harry Martin, NAVFAC Anne Brockett, SHPO Andrew Lewis, SHPO		

The meeting was held to discuss the revisions to the design, and next steps to complete the EA.

- Introduction of project for Andrew and review for Anne.
 - BELL reviewed what is currently on site, existing masonry house with added wings and garden walls.
 - BELL discussed the approach of the design of separating the two threats, vehicle and pedestrian.
 - BELL briefly reviewed what options have been presented in the past and how the design has evolved from the comments from the reviewing agencies and community input.
- Discussion of current design.
 - Anne is happy with progress that has been made and the current direction of the design.
 - BELL discussed the Marines requirements for the booths. They will be connected to power, surveillance and communication systems of the base. They will accommodate two people standing.
 - SHPO has issues with the security booths
 - Have a concern with the current locations out at the intersections; prefer something close to the garden wall, but not penetrating it.
 - Quantity, prefer just one at the less prominent corner at G and 9th.
 - Additional landscape areas
 - SHPO is supportive of the additional garden areas created at the relocated fence sections. It better ties into the neighborhood, and eliminates the large paved areas.
 - SHPO is supportive on the expanded tree boxes and the effect it has on lessening the impact of the bollards. Concern over the size of the boxes being larger than is typical for the area. BELL can provide additional breaks after having a discussion with DDOT.
 - Bollard design / location
 - BELL explained that the bollards shown are not a final design and will be refined as the design moves forward.
 - SHPO wants the spacing to be as wide as is possible. The current design shows the spacing at 5 feet on center.

- Fence Design
 - SHPO is supportive of the current fence height of 5 feet tall, which has been lowered from the originally proposed 8 foot height.
 - SHPO feels the design has drastically improved, being lighter and fitting better with the design of the existing fence.
 - SHPO was in support of the way the fence stepped/ transitioned from the existing 3 foot tall fence to the proposed 5 foot tall fence.
- Next Steps
 - MOA
 - SHPO will provide MOA examples to assist in the drafting one for this project.
 - SHPO wants CFA and NCPC to informally review the current design prior to finalizing the MOA.
 - Consultation
 - NAVFAC to contact and schedule meeting with CFA and NCPC to review current design and receive feed back.
 - BELL to contact the Advisory Council, and NPS to discuss the project.
 - Meet with DDOT
 - SHPO suggested contact Chris the Ward 6 coordinator from DDOT.
 - To discuss fence height, guard booths, bollards, and size of tree boxes.

Capitol Hill Restoration Society – August 2009

- 1. 801 G Street, SE (Marine Commandant's House)** – *The committee recognizes that the present Commandant and his wife have been enthusiastic supporters of the neighborhood, its merchants, and its traditions. We appreciate greatly their personal involvement in the neighborhood as well as the contributions of other officers, musicians, and enlisted men and women.*

Part of the difficulty in assessing this proposal is that we have no real information about realistic security threats or an assessment of what these proposals would accomplish, even though some members of the committee have worked with security issues. In addition, the Environmental Assessment Report is still only in draft form and is being reviewed.

The security upgrades proposed for the Marine Commandant's House would mark a new chapter in the relationship between this historic post and its surrounding neighborhood. For over 200 years the House has addressed its neighbors in much the same way as the surrounding residential homes address their more famous neighbor -- a front door, steps, a modest front garden and low-scale fence at the sidewalk. Even when the house was greatly expanded early in the 20th century, its presence on the street maintained the typical neighborhood pattern. It is probably one of the few – if not the only – commanding officer's house of the US military services that is not totally enclosed within the surrounding walls of the post. This neighborhood commonality has been a hallmark of this section of Capitol Hill, whatever annoyances the civilians and the military have otherwise inflicted on each other. The security features proposed, while presumably providing some measure of protection for the House and its occupants against potential dangers, would begin to wall off the neighborhood and alter the historic commonality. The committee is deeply troubled by this change.

Architect David Bell and a contingent from the Marines presented the security proposals, which centered on bollards, a taller fence directly in front of the Commandant's House and moving the historic fence to the farther ends of the public space, increased garden area, guard posts and two large planters.

- *New iron fence (5'+ high) spanning the front façade and re-positioning of historic fence:* The committee is still opposed to the high height of this fence as it is basically out of the neighborhood context and out of proportion to the distance from the sidewalk to the front door. Whether it would discourage the dangerous element is a matter of conjecture but we feel certain that it will contribute to an uncomfortable experience for the Marine Corps visitors to the House, to neighborhood residents who are getting from one part of their neighborhood to another, and to visitors of Barracks Row stores and restaurants. Locking the gate and the front door at all times would take care of the adventuring passersby. If the 5' height is allowed, we strongly recommend that the fence be of similar design to the historic fence now in place – it is more open visually than the proposed replacement and the awkward higher height will indicate to all that this is not the historic fence. In addition, the proposed new fence, with its two layers of finials, is exceedingly dense in appearance, compounding the uncomfortable effect of the higher height. The new double gate is a reasonable feature because it is the same as the width of the door, steps and walk and because the Commandant and his wife host many functions with numerous visitors. This would allow ease of access on those occasions.

- *Guard Post* – The two proposed guard posts, while probably not popular with many immediate neighbors, definitely do not fit into the “guard shack” category, a description applied by some neighbors to the present structure. Since it seems to us that the Marines will likely be on guard duty at these two corner locations for the foreseeable future, attractive shelters would be beneficial to the individual marines as well as would provide a buffer for the late night/early morning conversations that disturb the neighbors. We appreciate the design efforts but the result, although attractive, calls to mind a garden folly and is somewhat incongruous on a city sidewalk. The architects might consider a more typical conical expression – a shape seen throughout the Historic District and on the Navy Yard watch tower. The actual roofs of the little buildings are flat and the AC unit will be on top of that with the decorative top/finial obscuring the equipment. We understand that the visible roof material is some type of metal mesh to allow for air circulation for the AC and urge that the equipment be as quiet as possible and the installation carefully engineered so as not to add to the night-time disturbance. The locations should be carefully considered so that pedestrians do not feel even more intimidated to walk down the sidewalk.
- *Garden space and planters* – The garden area will be expanded both east and west along the wall, reducing the amount of paving in the public space. We understand that the landscape firm Oehme Van Sweden is consulting on plant selection. We can enthusiastically support this element of the proposal as it gets rid of the cars/trucks that have long parked illegally on public space and restores the linear park, providing a more fitting setting to the Commandant’s House and the Capitol Hill Historic District. Although the inclusion of the concrete planters was probably in response to some suggestions made at a community meeting, in this plan they seem to be something of a random element, probably adding more confusion than beauty. Since we’re probably going to have bollards in any event, reducing the total number by one or two is really not much of a benefit.
- *Bollards* – If there’s any opinion that a majority of Capitol Hill residents can be counted on to share, it is probably an antipathy to bollards ranging through their neighborhood. Many are not convinced that they provide more than window dressing or a “feel good” approach while others feel strongly that they would only deflect the damage from the intended target more directly on to the nearby residences. However, given the likelihood of their eventual deployment, our only suggestion is to consider using an offset pattern along G Street – bollards at the curb within the tree boxes and then bollards pulled forward into the sidewalk about 18” in the space between the tree boxes. This staggered pattern will not impact the pedestrians by reducing their walking space as the enlarged tree boxes are the controlling factor on that or significantly alter the effectiveness of the bollards. (There would always be several acting in concert due to the footings.) Since the (presumed) higher fence already will be presenting an aggressive edge along the walk next to the house, softening the stiff linear edge line of bollards that is shown on the plans could be helpful. It could also make it easier to open car doors.

Capitol Hill Restoration Society – October 2009

1. **801 G Street, SE (Marine Commandant's House)** – Last month the committee made specific comments about elements of the proposal to augment security features at the Marine Commandant's House as well as some introductory comments. Those comments are included again in our assessment of the October proposal. We noted that part of the difficulty in assessing this proposal is that we have no real information about realistic security threats or an assessment of what these proposals would accomplish, even though some members of the committee have worked with security issues. In addition, the Environmental Assessment Report is still only in draft form and is being reviewed.

The security upgrades proposed for the Marine Commandant's House would mark a new chapter in the relationship between this historic post and its surrounding neighborhood. For over 200 years the House has addressed its neighbors in much the same way as the surrounding residential homes address their more famous neighbor -- a front door, steps, a modest front garden and low-scale fence at the sidewalk. Even when the house was greatly expanded early in the 20th century, its presence on the street maintained the typical neighborhood pattern. It is probably one of the few – if not the only – commanding officer's house of the US military services that is not totally enclosed within the surrounding walls of the post. This neighborhood commonality has been a hallmark of this section of Capitol Hill, whatever annoyances the civilians and the military have otherwise inflicted on each other. The security features proposed, while presumably providing some measure of protection for the House and its occupants against potential dangers, would begin to wall off the neighborhood and alter the historic commonality. The committee is deeply troubled by this change.

We are, however, pleased to note that there have been several modifications to the September plan, modifications that address some of our specific concerns and observations expressed last month:

- We are pleased to note that the guard posts have been pulled in to the extended green space (which in itself is a positive element of this plan). These will be less obtrusive to the neighbors and passersby, yet still useful to the marines in their sentry duty. We suspect that this is a major concession to the residential nature of the street.
- The design of the guard posts (particularly the roof) has been modified so that it has less of a "garden folly" approach (which is somewhat incongruous given the number of armed marines usually about). Committee generally felt that the openness and transparency was a positive characteristic but that some additional study of design details might more successfully combine its usefulness as a guard post and its position on a residential street in something of a garden space.
- Although the community at large is weary of bollards and dubious of their actual benefits (considering the closeness of the bollards to the house and the neighboring houses), the changes in their deployment and reduction in number suggested by the Marines do help to break up the unrelenting nature of the earlier plan.
- By using the bollards within the new planting area in a somewhat staggered configuration and disguised by hedges and other plant material, this plan reduces the number of visible bollards and emphasizes the open garden space. The landscape architects can work with the plans to refine and blend the landscape instead of having a strip of hedge within a more relaxed/domestic overall plan.
- At the two center tree boxes, pulling in the bollards to the inner edge of the tree box will help to soften the line along the curb, introducing some "breathing space", but it is

difficult to know whether having them next to the pedestrian path will seem more intrusive. There is a question of how much the footer for this bollard will impede the growth of the tree, but perhaps a well-thought-out care plan can help to overcome that disadvantage.

- The committee is still not convinced that the higher fence is needed in front of the house but the Marines seem determined that it is. We do appreciate that our comment regarding the apparent “density” of the new fence has resulted in a modification that does lighten the fence visually and we are also appreciative that the height of the fence has been reduced 4”. The concrete curb has also been reduced 1”.

It appears to us that the Marines have considered our previous comments and made adaptations to their plans. We also understand from our most recent meeting that there will be some repair, maintenance work and interior upgrades conducted this spring and summer. We appreciate being notified of these plans; the community takes pride in this special house and the historic relationship of the Marines and Navy Yard in Capitol Hill.



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Meeting Minutes

Project:	Quarter 6 Security Upgrade	Project No:	090-023
Meeting Location:	921 Pennsylvania Ave. SE	Date:	10/06/09
By:	Scott Knight	Time:	10:00am

Attendees

Discussion Issues:

BELL Review:

- Reviewed existing sidewalk and fences on both sides of G Street.
- Reviewed the program of bollards, taller fence, and warming hut.
- Reviewed community concerns, location of guard booth, height of fence, continuous line of bollards.

BELL presentation of revisions:

- Reduced the bollards by breaks at the trees and relocating other to garden area.
- Reduced the fence height to 4'-8", lowered curb to 3", and opened up the design.
- Reduced the diameter of the bollards which required reducing the spacing between.
- Reduce the number of street lights to a single one as is there today.

Commissioner comments:

- What comments were received from CHRS? (Garrison) Plant material, roof shape of guard booth. (BELL)
- What is the reason behind the security elements (bollards & fence) and what the elements serve? (Garrison) The original design called for protection from both vehicle and pedestrian with a single element. After the initial meetings with reviewing parties the threats we treated separately. For the bollards the angle of possible attack drives the spacing. (BELL)
- What is the spacing between bollards? (Green) They are 4'-7" center to center with approximately 4' clear distance between them. (BELL)
- What is the difference in height between the bollards and the plantings? (Jarboe) Bollards will be 2'-6" in height in the planted areas, the plants would be slightly taller than that. The planting selection will need to be determined with input from the landscape architect. (BELL)

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-
- When will the project be completed (construction) and its duration? (Green) Complete to be before parade season in May of 2011, construction should take between 6- 8 months. (Harry)
-
- Commission has received numerous letters both for and against the project, which will be recorded. (Oldenburg)
-

Community comments:

- Was bollard spacing decreased? (Karl Kindel) They were decrease with the decrease of the diameter. (BELL)
-
- Will written comments be considered? (Karl Kindel) They will. (Marines)
-
- What are the next steps in the process for approval? (Kim Ross) Completion of the EA, which contains history, community input. (BELL)
-
- Why the overlapping bollards creating the double row? (Kim Ross) Provides protection from an attack without having a bollard in the sidewalk. There is vulnerability in this approach, but the Marines are willing to take. (BELL)
-
- Will parking remain and will be able to open doors? Parking will be allowed, car may need to move forward or back slightly, but no different then the other obstacles typical encountered when parking. (BELL)
-
- What is the level of protection provided for the other Joint Chiefs of Staff? It is considerably higher than what is being achieved here.
-
- Received support for reducing in the hardscape and relocation of the guard booths, design is better than presented before, it will add to the neighborhood. (community members and business owner)
-
- Can you provide documents on why this is necessary? (Karl Kindel) Agree to provide links to DOD documents. (Marines)
-
-
-
-

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ANC 6B

Capitol Hill / Southeast

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October 14, 2009

OFFICERS

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Ken Jarboe
Secretary
Kirsten Oldenburg
Treasurer
Carol Green
Parliamentarian
Vacant

Historic Preservation Review Board
DC Historic Preservation Office
Reeves Center
2000 14th Street, NW, Ste. 4000
Washington, DC 20009

RE: HPA # 08-318, 821 G Street, SE – Revised Plans for Security Upgrade at USMC Commandants House

Dear Board Members:

COMMISSIONERS

SMD 1 *David Garrison*
SMD 2 *Mary Wright*
SMD 3 *Vacant*
SMD 4 *Kirsten Oldenburg*
SMD 5 *Kenan Jarboe*
SMD 6 *Will Hill*
SMD 7 *Carol Green*
SMD 8 *Neil Glick*
SMD 9 *Michael Patterson*
SMD 10 *Francis Campbell*
SMD 11 *Vacant*

At a regularly called and properly noticed meeting on October 13, 2009, with a quorum present, ANC 6B voted 3 to 2 to support the applicant's plans as presented.

The Commission is taking this action because the revised plan lessens the impact of the security elements and provides a better balance between preservation of the neighborhood and the setting of this historic building with the security directives of the military.

Please notify the Commission if you have any questions or comments.

Very truly yours,



David F. Garrison
Chairperson

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Meeting Minutes

Project:	Quarters 6 – Security upgrades	Project No:	090-023
Meeting Location:	401 E Street NW (CFA)	Date:	10/28/09
By:	Scott Knight	Time:	2:00pm

Attendees	Email	Phone
-----------	-------	-------

See attached Sign-in Sheet

Meeting was held to review the current design and receive concurrence with the staffs of the consultation agencies prior to submitting for formal review by their boards. The agencies were concern since it had been a year since the last time the design was presented to all of them as a group. They also wanted to take into consideration the concerns of each of the others agencies.

David Bell summarized the evolution of the design since it was first presented 2007 to the current iteration.

Discussion Issues:	Action/Status:
Fence <ul style="list-style-type: none"> DDOT- Concerns over the height of the new fence, not keeping with DC regulations of 42". BELL – Identified that the taller fence is not out of character with the height and size of the building. 	
Guard booth <ul style="list-style-type: none"> Dahl – They will be used as warming huts. Guards will be out on patrol most of the time, will step in for a few minutes to get out of the weather and warm up. 	
<ul style="list-style-type: none"> Provide procedures for loading and unloading of guests and interaction with guards. Dahl – Typically prearranged with no need to interact with guards. 	
<ul style="list-style-type: none"> HPO suggests relocating the booths back further potentially attached to the garden walls, as a projection or bay. Others where not sure about its effect on the walls and overall appearance. BELL is concern over the sightlines. 	
<ul style="list-style-type: none"> CFA – Would like to see a smaller, possible brick structure based on gate house at Post #1. Other possibility for it to be less like a garden structure. 	BELL will explore other options.
Bollards <ul style="list-style-type: none"> BELL reviewed the bollards spacing and breaks at the trees and how they function/ provide protection. 	

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<ul style="list-style-type: none"> BELL - Design is in reaction to community concern over repeated feature along the curb. Current design breaks at the trees and is in the garden area closer to the corners with 8th and 9th streets. 	
<ul style="list-style-type: none"> CFA – Concern over bollards interfering with vehicle parking. Push them to either the middle or rear side of the tree boxes. 	
<ul style="list-style-type: none"> NCPC – Needs to see vector information to make determination over size, spacing, and location. 	Harry will schedule meeting to share information.
<ul style="list-style-type: none"> CFA - Bollards are street furniture, and should be placed within the hardscape, not in the garden. 	
<ul style="list-style-type: none"> DDOT – Preference to not have bollards in Public Space, compromise position is beside the sidewalk in the garden area. 	
<p>Landscape</p> <ul style="list-style-type: none"> NCPC - Would like to see additional landscaped area at the corner of 9th and G. Potentially move historic fence out further and reconfigure. 	
<p>Other</p> <ul style="list-style-type: none"> CFA – Recommends moving the Commandant to a more secure location. Current Commandant may accept more risk than other Commandants in the future, what will stop them from wanting additional measures in the future. BELL – Need to focus more on the effects to the historic character of property and the use of the building not the occupant. 	
<p>Next steps</p> <ul style="list-style-type: none"> NCPC – Do not need EA or completion of Section 106 for concept review, preliminary and final reviews do need these documents completed. 	
<ul style="list-style-type: none"> Order for review should be CFA then HPO and lastly NCPC. Could possible present to HPRB in December with others in January. 	
<ul style="list-style-type: none"> A consensus among the staff of the agencies would need to be reached before forwarding on to their respected boards. 	Harry - Will schedule a meeting in approximately two weeks to review alternatives.

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Sign-In Sheet

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Project: Quarters 6, Fence Replacement

Project No: 090-023

Meeting Location: 401 F Street NW (CFA)

Date: 10/28/09

Purpose: Consultation with reviewing agencies

Time: 2pm

Print Name	Signature	Company Name	Telephone No.	Email Address
David Bell		Bell Architects	202-548-7570	DAVID.BELL@BELLARC.COM
Scott Knight		Bell Architects	202-548-7570	SCOTT.KNIGHT@BELLARC.COM
Harry Martin		NAVFAC WASH	202-685-3220	HARRY.MARTIN@NAVY.MIL
Pete E Dahl		MBW S4	202-431-4669	PETER.DAHL@USMC.MIL
Charles R Reuning		NAVFAC WASH		charles.reuning@navy.mil
✓ Frederick Lindstrom		CFA	202-504-2200	flindstrom@cfa.gov
David Levy		NCPIC		david.levy@ncpc.gov
Anne Brockett		DCHPO	202-442-8842	anne.brockett@dc.gov
SMITH BATTERER Spattheler		CFA	202.504.2200	spattheler@cfa.gov
WANDA WITKESBELL		NCPIC	2/432.7239	wanda.witkesbell@ncpc.gov
Carlton Hunt		NCPIC	202-432-7252	Carlton.hunt@ncpc.gov
Harry Abrams		NAVFAC WASH	202-685-3220	harry.abrams@navy.mil
Chris Sheehan		OP	202-442-7616	chris.sheehan@dc.gov



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Meeting Minutes

Project:	Quarters 6 – Security upgrades	Project No:	090-023
Meeting Location:	2000 14 th Street NW (DDOT)	Date:	10/29/09
By:	Scott Knight	Time:	2:00pm

Attendees	Email	Phone
-----------	-------	-------

See attached Sign-in Sheet

The meeting was a Preliminary Design Review Meeting PDRM to discuss the proposed work in public space at 801 G Street SE. The meeting was lead by Bill Schoon with the Public Space Permit branch. All individuals introduced themselves and are included in the attached sign-in sheet. David Bell of BELL Architects presented the project and each of the components in the design.

Discussion Issues:	Action/Status:
Fence <ul style="list-style-type: none"> Prefer to have a fence lower than the 42” max per regulations. BELL – The fence at the Old Naval Hospital is 8’ tall along the sidewalk. The taller fence proposed works with the scale of the building. 	
Guard booth <ul style="list-style-type: none"> Have no comments on the size and scale they will refer to HPO, CFA, and NCPC. 	
Bollards <ul style="list-style-type: none"> James Henson – Who will be responsible for the care and maintenance once they have been installed? If they are damaged who will repair or replace? 	Dahl – The Marines will maintain them, and address any damage.
<ul style="list-style-type: none"> Prefer not to have them in public space. Suggested to use alternatives such as raised cross walks or speed humps. The compromise is that the bollards be on the garden side of the sidewalk. BELL – These alternative options were presented to the community and were not supported. 	
<ul style="list-style-type: none"> Other option presented was to have no parking or restrict parking on the south side of G Street. 	Dahl- The Marines will need to evaluate this option. Parking is a major concern in the neighborhood.
Landscape <ul style="list-style-type: none"> Simoun Banua – Asked about the size of the tree box between the bollards. BELL – A little more than 10’ between the centers of the 	

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<p>bollards, with a little less clear between the footings below ground.</p>	
<ul style="list-style-type: none"> • Their will be a fee for each tree removed, this will be covered by security deposit. 	
<ul style="list-style-type: none"> • The existing tree near the corner of 8th and G Streets shall have a tree protection plan. 	<p>BELL will include on final documents tree protection.</p>
<ul style="list-style-type: none"> • Simoun Banua – Trees need to be replaced inch for inch. Estimated amount is 38.8” of circumference. If this number cannot be obtained in the tree boxes then other areas can be used such as, in the garden area, in a near by park, or school in the area. 	
<ul style="list-style-type: none"> • Preferred tree species for the tree boxes is sterile Sweetgum. 	<p>BELL will pass this on to the landscape architect.</p>
<ul style="list-style-type: none"> • Need to include a detail of the root structure. BELL – A generic one is included in the package. 	<p>BELL – A detail will be provided in the final documents.</p>
<p>Other items</p> <ul style="list-style-type: none"> • James Cheeks often receives calls relating to the no parking along the barracks on Thursday and Fridays. 	<p>Dahl has agreed to send a document identify the activities and procedures.</p>
<ul style="list-style-type: none"> • Handicap ramps to be shown at intersections. BELL – Ramp currently exist. 	<p>BELL – Will make sure to clearly show, identify them.</p>
<p>Next steps</p> <ul style="list-style-type: none"> • Provide documentation of the community process. Include letters in support/ against, and minutes from public meetings. 	<p>BELL will provide documents covering the evolution of the design over time.</p>
<ul style="list-style-type: none"> • If all options have been exhausted, and no other concessions can be made than it can presented to the board with all the documents for the meetings held. 	
<ul style="list-style-type: none"> • Meeting minutes to be provided to DDOT with-in 10 days of meeting. 	<p>BELL will provide minutes and sign in sheet.</p>

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Sign-In Sheet

Project: Quarters 6; Security upgrades

Project No: 090-023

Meeting Location: 2000 14th Street NW

Date: 10/29/09

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Purpose: Preliminary Design Review Meeting Program (DDOT PDRM)

Time: 2pm

Print Name	Signature	Company Name	Telephone No.	Email Address
David Bell		Bell Architects	202-548-7570	DAVID.BELL@BELLARC.COM
Scott Knight		Bell Architects	202-548-7570	SCOTT.KNIGHT@BELLARC.COM
Matt Schwartz		NAVFAC WASH	202-685-3277	matt.schwartz1@navy.mil
Pete E Dahl		MBW S4	202-433-6269	PETER.DAHL@USMC.MIL
Lewis Booker		DDOT	202-671-2238	lewis.booker@dc.gov
Bill Schaefer		DDOT	2/535 2237	bill.schaefer@dc.gov
SIMON BAKER		DDOT	2/671-5153	SIMON.BAKER@dc.gov
Jamie Henson		DDOT - TSDA	671-1524	jamie.henson@dc.gov
JAMES M. CHEEKS		DDOT TTPA	671-0495	JAMES.M.CHEEKS@dc.gov
Shannuis James				

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Meeting Agenda

Project:	Quarters 6 – Security upgrades	Project No:	090-023
Meeting Location:	NCPC – 401 9 th Street NW	Date:	01/11/10
By:	Scott Knight	Time:	3:00pm

Attendees	Email	Phone
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See attached Sign-in Sheet

The meeting was held to discuss the current options for the design of the security upgrades at Quarter’s 6 of the Marine Barracks. Following up on the joint meeting held on 10/28/09, and to reach a consensus for a single design to move forward to present to their respected boards.

Discussion Issues:	Action/Status:
Bollards <ul style="list-style-type: none"> What is the height of the bollards (Witherell). The structural element is 30” with the decorative cover it is 36”, this element has not been changed from last design presented (Bell). 	
<ul style="list-style-type: none"> Clarifications on why the bollard spacing is different from the east side to the west side (Lindstrom). Earlier version, bollards to match the spacing of fence post with one additional bollard between (Bell). 	BELL will make corrections to the drawings to reflect the design intent.
<ul style="list-style-type: none"> Location inside or outside of fence? After much discussion it was determined that additional elevations showing the two options would be needed. After revisiting this issue it was determined that the bollards shall run inside the fence on a curb with the fence. They shall be plain 6” diameter steel tubes with a simple cap. Located close to the fence post, repeating their spacing. 	BELL will make changes to the design to reflect the bollards on the inside as accepted by all.
<ul style="list-style-type: none"> For ADA there needs to be 4’ clear between bollards at the tightest point (Shaheen). 	BELL will revisit design to accommodate this spacing at one location at each end.
Controlled Parking <ul style="list-style-type: none"> What is being referenced by the note and hatching showing parking barrier (Lindstrom). This is restricted parking that the Marines will control (Bell). 	BELL Will change the wording of the note to correctly reflect the intent.
<ul style="list-style-type: none"> How will the Marines keep the parking space full and provide security barrier (Carlton). They will not fill in holes (Henger). 	
<ul style="list-style-type: none"> Intent is for Commandant and staff along with approved neighbors to 	Shaheen to provide contact

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access to available spaces, except during special events (Henger). Check with Alison Kelley with DDOT about pilot program for restrictive parking (Shaheen).	information for Alison Kelly.
Guard booth	
<ul style="list-style-type: none"> • Raised or at grade – Consensus was to have a raised base of concrete, assuming the walk adjacent to the booth will be slate. 	BELL will continue to develop the design using this information.
<ul style="list-style-type: none"> • Flat or screened roof – Flat. Possibly with a PV panel (Goodfellow). 	BELL will use the flat roof, and explore the possibility of PV.
<ul style="list-style-type: none"> • Brick or metal base – Metal base as shown in design H-1A. 	BELL will continue to develop the design using this information.
<ul style="list-style-type: none"> • Expressed columns – Preferred no column above lower panel, as shown in design J-1. 	
<ul style="list-style-type: none"> • Octagon or hexagon – Hexagonal is preferred layout. 	
<ul style="list-style-type: none"> • Overhang is acceptable by all as shown in design J-1. 	
<ul style="list-style-type: none"> • Location of the guard booth is acceptable to move closer to the corner, working with the discussed location of the bollards, and the increased visibility the Marines desire (Witherell). 	BELL will make adjustment to the location of booths, east and west.
<p>Additional planted area</p> <ul style="list-style-type: none"> • Would like to see it extend to both the fence and building face (Batcheler). What will be planted in this area (Lindstrom). Will be planted with seasonal plantings similar to the garden in front of the house (Bell). 	BELL will make the suggested adjustments.
<p>Fence location/ relationship to house</p> <ul style="list-style-type: none"> • All concluded that they preferred the layout of the fence as shown in Option F. This reflects the placing the new taller fence at the same location as the historic fence, not being symmetrical along the façade of the building. 	BELL will move forward with Option F for the submissions.
<ul style="list-style-type: none"> • Fence design and height was briefly discussed, all deferred decision to HPO. The response was that there was no issue (Brockett). 	
Other items	
<ul style="list-style-type: none"> • NCPD will not accept a package for review until the Section 106 process is complete. 	Marines/ BELL will delay submission, instead go to April hearing.

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- Once the ANC and HPRB has voiced their opinions HPO will be ready to complete Section 106.

BELL will provide assessment of effect.

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100111 Consultation Meeting minutes.doc

MEETING SIGN-IN SHEET

PROJECT: MCBW – Quarters 6 (Commandant's Quarters)

DATE / TIME: January 11, 2010, 3:00-4:00pm

LOCATION: NCPC, Moynihan Room

NAME	REPRESENTING	PHONE	E-MAIL
Carlton Hart <i>CH</i>	NCPC	202-482-7252	Carlton.Hart@ncpc.gov
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Jay Jorgensen	NAVFAC	2.685.3094	jay.jorgensen@navy.mil

Appendix 4:
National Register Nomination Form
USMC – Quarter 6
Fence upgrades

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**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

SEE INSTRUCTIONS IN *HOW TO COMPLETE NATIONAL REGISTER FORMS*
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS

1 NAME

HISTORIC

U.S. Marine Corps Barracks and Commandant's House

AND/OR COMMON

U.S. Marine Corps Barracks and Commandant's House

2 LOCATION

STREET & NUMBER

801 G Street, SE.

NOT FOR PUBLICATION

CITY, TOWN

Washington

CONGRESSIONAL DISTRICT

District

STATE

D.C.

VICINITY OF

CODE

11

COUNTY

CODE

001

3 CLASSIFICATION

CATEGORY

- DISTRICT
- BUILDING(S)
- STRUCTURE
- SITE
- OBJECT

OWNERSHIP

- PUBLIC
- PRIVATE
- BOTH
- PUBLIC ACQUISITION**
- IN PROCESS
- BEING CONSIDERED

STATUS

- OCCUPIED
- UNOCCUPIED
- WORK IN PROGRESS
- ACCESSIBLE**
- YES: RESTRICTED
- YES: UNRESTRICTED
- NO

PRESENT USE

- AGRICULTURE
- COMMERCIAL
- EDUCATIONAL
- ENTERTAINMENT
- GOVERNMENT
- INDUSTRIAL
- MILITARY
- MUSEUM
- PARK
- PRIVATE RESIDENCE
- RELIGIOUS
- SCIENTIFIC
- TRANSPORTATION
- OTHER:

4 OWNER OF PROPERTY

NAME

United States Government

STREET & NUMBER

Department of Defense, The Pentagon

CITY, TOWN

Washington

VICINITY OF

STATE

D.C.

5 LOCATION OF LEGAL DESCRIPTION

COURTHOUSE,
REGISTRY OF DEEDS, ETC.

Recorder of Deeds

STREET & NUMBER

6th and D Streets, NW.

CITY, TOWN

Washington

STATE

D.C.

6 REPRESENTATION IN EXISTING SURVEYS

TITLE

National Register of Historic Places

DATE

1968; 1972

FEDERAL STATE COUNTY LOCAL

DEPOSITORY FOR
SURVEY RECORDS

1100 L Street, NW.

CITY, TOWN

Washington

STATE

D.C.

7 DESCRIPTION

CONDITION

CHECK ONE

CHECK ONE

EXCELLENT

DETERIORATED

UNALTERED

ORIGINAL SITE

GOOD

RUINS

ALTERED

MOVED DATE _____

FAIR

UNEXPOSED

DESCRIBE THE PRESENT AND ORIGINAL (IF KNOWN) PHYSICAL APPEARANCE

(Much of the following is based on National Register nominations prepared in 1972 by Alfred Branam, Architectural Historian, National Capital Planning Commission. Facts have been verified through additional research and an on-the-spot inspection, however.)

The U.S. Marine Corps Barracks and Commandant's House comprise the Nation's oldest continually active Marine Corps installation. Situated in southeast Washington, the post occupies a rectangular site about 250 feet wide and 630 feet long. It is bounded by G Street on the north, I Street on the south, 8th Street on the west, and 9th Street on the east. The post includes the Marine Corps Commandant's House, a range of barracks, a band hall, a row of five officer's quarters, and a modern service building that abuts the north end of the barracks. These structures form a quadrangle that encloses a rectangular parade ground measuring approximately 160 feet by 385 feet. Except for the Commandant's House, which faces north, all the buildings face the parade ground.

Originally, the post consisted of the Commandant's House and a range of barracks on the west side of the parade ground. Generally believed to have been designed by George Hadfield, these were completed in 1801-6. In the middle of the one-story barracks was a two-story "Center House," or officers' quarters, which burned in 1829 and was subsequently replaced with a three-story structure. As time passed in the 19th century, the post garrison grew, and between 1834 and 1900 a hospital, band hall, and shooting gallery were added. In 1900, however, following successive complaints from several commandants about the inadequacy of the facilities, a sanitary commission recommended that all existing structures except the Commandant's House be replaced. The recommendation was carried out soon afterward, leaving only the Commandant's House remaining from the original post. Architects Hornblower and Marshall received the commission to design the new barracks, and they located them along the east side of the parade ground. They also designed the band hall that joins the barracks at a 90 degree angle and crosses the south end of the post. There is no evidence that Hornblower and Marshall drew the plans for the new officers' quarters erected at the same time on the west side of the parade ground, but the design of the structures suggests that this was the case. The new construction was carried out between 1903 and 1907. Today, except for the below-described changes in the Commandant's House, the post remains much as it appeared about 1910.

(continued)

8 SIGNIFICANCE

MILITARY AND MUSIC

PERIOD	AREAS OF SIGNIFICANCE -- CHECK AND JUSTIFY BELOW			
<input type="checkbox"/> PREHISTORIC	<input type="checkbox"/> ARCHEOLOGY-PREHISTORIC	<input type="checkbox"/> COMMUNITY PLANNING	<input type="checkbox"/> LANDSCAPE ARCHITECTURE	<input type="checkbox"/> RELIGION
<input type="checkbox"/> 1400-1499	<input type="checkbox"/> ARCHEOLOGY-HISTORIC	<input type="checkbox"/> CONSERVATION	<input type="checkbox"/> LAW	<input type="checkbox"/> SCIENCE
<input type="checkbox"/> 1500-1599	<input type="checkbox"/> AGRICULTURE	<input type="checkbox"/> ECONOMICS	<input type="checkbox"/> LITERATURE	<input type="checkbox"/> SCULPTURE
<input type="checkbox"/> 1600-1699	<input type="checkbox"/> ARCHITECTURE	<input type="checkbox"/> EDUCATION	<input checked="" type="checkbox"/> MILITARY	<input type="checkbox"/> SOCIAL/HUMANITARIAN
<input type="checkbox"/> 1700-1799	<input type="checkbox"/> ART	<input type="checkbox"/> ENGINEERING	<input checked="" type="checkbox"/> MUSIC	<input type="checkbox"/> THEATER
<input checked="" type="checkbox"/> 1800-1899	<input type="checkbox"/> COMMERCE	<input type="checkbox"/> EXPLORATION/SETTLEMENT	<input type="checkbox"/> PHILOSOPHY	<input type="checkbox"/> TRANSPORTATION
<input checked="" type="checkbox"/> 1900-	<input type="checkbox"/> COMMUNICATIONS	<input type="checkbox"/> INDUSTRY	<input type="checkbox"/> POLITICS/GOVERNMENT	<input type="checkbox"/> OTHER (SPECIFY)
		<input type="checkbox"/> INVENTION		

SPECIFIC DATES 1800-present

BUILDER/ARCHITECT Cdt's House: George Hadfield
Barracks: Hornblower & Marshall

STATEMENT OF SIGNIFICANCE

More than any other structures, the U.S. Marine Corps Barracks and the adjacent Marine Corps Commandant's House are symbolic of the dedication and pride that have made the U.S. Marine Corps one of the world's most elite fighting forces. According to military historian B. H. Liddell Hart, the Corps "has gone further than any armed force in any country towards demonstrating the potentialities of a three-in-one force, combining sea, land, and air action."¹

The oldest continually active post in the Corps, the Marine Barracks served as Marine Corps Headquarters from 1801 to 1901. Here recruits and officers were trained, and vital decisions were made affecting Corps development. Troops quartered at the Barracks played significant roles in the wars with the Barbary pirates, the War of 1812, the Seminole War, the capture of John Brown at Harper's Ferry, and the conquest of Cuba in the Spanish-American War.

As the home of the Marine Band, which has played for every President since John Adams, the Marine Barracks witnessed a significant epoch in American musical history when John Philip Sousa, the "March King," served as leader from 1880 to 1892. During his tenure, Sousa wrote some of his most famous marches including the "Washington Post March" which, says Arthur M. Schlesinger, "was probably the best known instrumental piece in the world at the time."² The Marine Band is still stationed at the Barracks and remains the official White House musical unit.

As American military might increased in the late 19th and early 20th centuries, the Marine Corps expanded in size, necessitating the transfer of the Headquarters and the recruit

(continued)

¹ Quoted in Robert D. Heinl, Jr., Soldiers of the Sea: The United States Marine Corps, 1775-1962, (Annapolis, 1962), vii.

² Arthur M. Schlesinger, The Rise of the City, 1878-1898 (New York, 1933), 306.



9 MAJOR BIBLIOGRAPHICAL REFERENCES

Heinl, Robert D., Jr., Soldiers of the Sea: The United States Marine Corps, 1775-1962 (Annapolis: United States Naval Institute, 1962).

Pierce, Philip N. and Hough, Frank O., The Compact History of the United States Marine Corps (New York: Hawthorn Books, 1964).
(continued)

10 GEOGRAPHICAL DATA

ACREAGE OF NOMINATED PROPERTY circa 6 acres

UTM REFERENCES

A	118	326	91810	43	10.5	11610	B						
	ZONE	EASTING	NORTHING					ZONE	EASTING	NORTHING			
C							D						

VERBAL BOUNDARY DESCRIPTION

(see last page of description)

LIST ALL STATES AND COUNTIES FOR PROPERTIES OVERLAPPING STATE OR COUNTY BOUNDARIES

STATE	CODE	COUNTY	CODE
STATE	CODE	COUNTY	CODE

11 FORM PREPARED BY

NAME / TITLE George R. Adams, Managing Editor
Ralph Christian, Assistant Editor

ORGANIZATION	DATE
<u>American Association for State and Local History</u>	<u>November 1975</u>
STREET & NUMBER	TELEPHONE
<u>1400 Eighth Avenue, South</u>	<u>(615) 242-5583</u>
CITY OR TOWN	STATE
<u>Nashville</u>	<u>Tennessee 37203</u>

12 STATE HISTORIC PRESERVATION OFFICER CERTIFICATION

THE EVALUATED SIGNIFICANCE OF THIS PROPERTY WITHIN THE STATE IS:

NATIONAL STATE LOCAL

As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the National Park Service.

STATE HISTORIC PRESERVATION OFFICER SIGNATURE

TITLE DATE

FOR NPS USE ONLY	
I HEREBY CERTIFY THAT THIS PROPERTY IS INCLUDED IN THE NATIONAL REGISTER	
	DATE
DIRECTOR, OFFICE OF ARCHEOLOGY AND HISTORIC PRESERVATION	
ATTEST	DATE
KEEPER OF THE NATIONAL REGISTER	

37

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**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET Marine Corps ITEM NUMBER 7 PAGE one

Commandant's House. Situated at the north end of the parade ground (at 801 G Street, SE.), this impressive 2½-story, white-painted, Flemish-bonded brick residence is the home of the Commandant of the U.S. Marine Corps, a function it has served continually since its construction in 1801 as a symmetrically composed, Federal Style dwelling. Initially only about 25 feet wide, the house over the years has undergone several renovations and received several additions. In 1840 a 16-foot-long, two-story, brick extension was added to the northeast corner, and a longer two-story, brick, servants' wing was attached to the northwest corner. The present mansard roof and hooded dormers were added in 1891, covering both the original block and the 16-foot extended section. That same year a one-story porch was placed across the rear of the original block making the house about 60 feet deep on the first floor. In 1934 a one-story, brick, kitchen-pantry-service wing was added to the east side of the 1840 extension. Despite all these changes, it is still possible to discern the original outline of the building.

Today one of the most striking features of the Commandant's House is its mansard roof, the tiles of which are regularly laid except for four center rows that display an imbricated pattern. Four hooded dormers grace the front slope, seven adorn the rear slope, two jut from east slope, and three protrude from the west slope. Surrounding the whole is a dentiled cornice, below which on the front facade is a fret design in wood. Initially the main block of the house had a three-bay front, but the 1840 extension added a fourth. The entrance, therefore, is to the right of center and in the second bay from the right. One approaches it by a series of brownstone steps. These rise from the pavement to wooden, tripaneled, double doors set under a fanlight and an arch of gauged brick that springs from limestone pilasters to a limestone keystone. The pilaster capitals and the keystone all are highlighted by a star design. To the left of the doorway are two two-over-two, shuttered, sash windows, each of which is surmounted by a transom and stone lintel. There is a like-rendered window on the right. Across the second story are four similar windows aligned with the openings below but lacking transoms. The fronts of the wings differ from the main block. The one-story, kitchen wing has a plain brick facade with three, small, shuttered, sash windows and a dentiled brick cornice; the two-story servants' wing is similarly designed.

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INVENTORY -- NOMINATION FORM**

CONTINUATION SHEET Marine Corps ITEM NUMBER 7 PAGE two

At the rear of the house, the 1891 porch dominates the ground floor facade. Composed of five brick pilasters spaced at 3½-foot intervals, the porch has two large mullion windows flanking a central, glass, double door that opens onto a small stoop with double side steps. These join walkways that lead through a small garden and a hedgerow to the parade ground. Above the porch one can see two original, contiguous, apsidal bays that rise two stories high and project beyond the main block facade in an arc of four feet. Fenestration on both stories is six across in groups of three. Each apsidal projection is capped by a curving extension of the mansard roof.

The interior decor of the house changes with each occupant, but recently the wife of Gen. Robert E. Cushman, Jr., the 25th Commandant, carried out a successful campaign to return many of the original furnishings to the residence, which is little-altered inside. Air conditioning, electric lighting, and other modern conveniences have, of course, been added. The basement, which extends under the main block and kitchen wing, contains a boiler plus laundry facilities and recreation and storage rooms. On the first floor of the main block, the front door opens into a vestibule and east-west hall, the crossing of which is accented by a plastered groin vault that rests on four delicately molded fluted pilasters. To the right of the vestibule is a reception room, and south of it, across the hall, is the formal sitting room. To the left of the vestibule is a dining room that extends into the kitchen wing, and, across the hall from it, is the music room. The second floor contains an east-west hall and four bedrooms. There are four more plus a servant's room on the upper floor. The servant's wing consists of a sitting room and bath on the first floor and two bedrooms and a bath on the second.

Barracks. The barracks, band hall, and row of officers' quarters all are constructed of glazed brick in multiple shades of red. The 40-foot-long, hip-roofed, slate-shingled barracks extends about

(continued)



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CONTINUATION SHEET Marine Corps ITEM NUMBER 7 PAGE three

490 feet along the east side of the post. Basically, it is a rectangular-shaped, two-story structure with a limestone string-course separating the first-story facade and its segmentally arched openings from the second-story facade and its flat-arched openings. The building's greater expanse is interrupted at three points by pavilions that project slightly beyond the principal facade, both front and rear, and rise slightly above the roof of the rest of the structure. The two endmost pavilions are three storied and hip roofed. The central one is larger. It is a 3½-story tower topped by a machicolated brick cornice and crenellated limestone parapet. On the ground floor, an arced loggia runs the entire length of the barracks. Until recently the first story housed various Marine offices, while enlisted men's quarters comprised the second floor. A new multistory barracks has been erected across I Street to the southeast, though, and so the barracks will soon be used almost solely for administrative purposes. The building is in excellent condition and should serve the new function well. It will continue its long-standing role as the traditional parade ground entry and exit for Marine units on parade at the post.

Band Hall. This rectangular-shaped, hip-roofed, 2½-story, brick structure measures about 200 feet in length and is 60 feet deep. Facing the parade ground, it extends almost entirely across the south end of the post and forms a right angle with the barracks. Like the barracks, the band hall has an arcaded loggia across most of the ground floor of the front facade and a limestone stringcourse that separates the first and second stories. Door and window openings are semicircularly arched on the north side of the ground floor, segmentally arched on the south side of the ground floor, and flat-arched on both the north and south sides of the second story. Eight hip-roofed dormers grace both the north and south roof slopes. There is a full basement, which presently houses the post exchange, NCO and enlisted men's clubs, a barber shop, and band dressing rooms. The first floor contains a guard shack, a press shop, band offices, and the Sousa Band Hall. On the second deck

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CONTINUATION SHEET Marine Corps ITEM NUMBER 7 PAGE four

there is a gymnasium, band library, recording studio, and more storage space. Also housed in the building are valuable artifacts related to Sousa's career. When the move to the new barracks is complete, the band will occupy all areas of the band hall.

Officers' Quarters (buildings 1, 2, 3, 4, and 5--corresponding respectively to numbers 4, 5, 6, 7, and 8 on the attached sketch map). Situated along the west side of the post, these houses are believed to have been designed by Hornblower and Marshall despite the fact that there is no conclusive supportive documentation and that the dwellings are more severe in design than these architects' usual residential structures. In any case, the houses have the same roof and cornice height and same roof shape that is displayed by the barracks and band hall. The five houses are almost identical. All are 2½ stories, hip roofed, and basically square shaped. Two interior brick chimneys pierce most roofs on both the north and south sides, and two hip-roofed dormers adorn each north and each south roof slope--except on building 1(4) which is slightly larger and shows three front dormers. A one-tiered, four-bay, hip-roofed, glass-enclosed porch passes fully across the front of residences 2(5), 3(6), 4(7), and 5(8), and a similar five-bay gallery graces the front of building 1(4). A brick foundation and brick pillars support each porch, and entrance to each is by straight steps on each end. Each structure has a small one-story, rear entrance wing at the northwest corner and displays one-over-one, double-hung, sash windows with limestone sills and lintels. The typical interior arrangement is a modified sidehall plan with two rooms on the ground floor front--a reception room and parlor--and two on the ground floor rear--a dining room and kitchen. Upper stories contain bedrooms. At present senior general officers occupy three of the houses; the post commander lives in the fourth; and the fifth serves as a bachelor officers' quarters and officers' mess.

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CONTINUATION SHEET Marine Corps ITEM NUMBER 7 PAGE **five**

Boundary Justification. The boundary, which is outlined in red on the accompanying maps, includes the original limits of the post plus the tree-lined sidewalks on the north and west sides, where are situated the entryways to the Commandant's House and the Marine Corps Barracks.

Boundary. As indicated in red on the accompanying U.S.G.S. and sketch maps, a line beginning at the intersection of 8th and G Streets, SE., and running approximately 300 feet eastward along the right curb of G Street to its intersection with 9th Street; thence about 680 feet south along the right curb of 9th Street to its intersection with I Street; thence approximately 300 feet westward along the right curb of I Street to its intersection with 8th Street; thence about 680 feet north along the right curb of 8th Street to the starting point.

Continuation Sheet Marine Corps Item Number 9 Page one

Schlesinger, Arthur M., The Rise of the City, 1878-1898 (New York: The Macmillan Company, 1933).

Schun, Karl, Home of the Commandants (Washington: Leatherneck Association, Inc., 1966).

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CONTINUATION SHEET Marine Corps ITEM NUMBER 8 PAGE one

and officer training facilities to more spacious quarters. Over the years, the Barracks' function has become increasingly ceremonial. At present, the post consists of the Commandant's House, the headquarters of the Marine Band, and a contingent of crack Marines who perform various ceremonial duties at the White House, Arlington National Cemetery, and elsewhere.

Early in the 20th century, the Marine Barracks underwent extensive renovation. The 2½-story, brick Commandant's House, completed in 1806 and the home of all Commandants since Franklin Wharton, is the only structure remaining of the original barracks complex. The oldest public building in Washington with the exception of the White House, it served as home for men like Archibald Henderson, Charles Heywood, and John A. Lejeune, all of whom played vital roles in the development of the modern Marine Corps. Other structures on the old post grounds include a barracks building, a band hall, and a row of five officers' quarters. All these brick structures were erected between 1904 and 1907. They fill the original post bounds and are in excellent condition.

History

Although the U.S. Marine Corps traces its origins to the Continental Marines of 1775, the modern Marine Corps was not founded until 1798 as part of the response to the undeclared naval war with France. Headquartered in Philadelphia, then the Nation's Capital, the new Corps was put on a firm footing by Commandant William Ward Burrows, who quickly raised the authorized number of men. Burrows also organized the Marine Band by levying monthly assessments on each officer for its support.

In 1800, under orders from Secretary of the Navy Benjamin Stoddert, Burrows transferred his command from Philadelphia to Washington, D.C. After their arrival, the Marines set up camp first in Georgetown and later on E Street while their Commandant

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CONTINUATION SHEET Marine Corps ITEM NUMBER 8 PAGE two

sought a site for a permanent barracks. In his search Burrows was often accompanied by his friend President Thomas Jefferson, and in 1801, they decided on a site near the Washington Navy Yard. After acquiring the necessary land, Burrows ran an advertisement in the National Intelligencer, offering \$100 for the best design for a barracks and commandant's house. Apparently, George Hadfield, an English architect who had designed the Custis-Lee Mansion and had served as Superintendent of Capitol Construction, submitted the best plans. Recently discovered documentary evidence seems to establish him as architect of the Barracks, and it appears likely he designed the Commandant's House as well.

Because the \$20,000 appropriated by Congress was insufficient to cover the costs of the proposed project, Marines did much of the construction work themselves. In the words of Marine historians Philip N. Pierce and Frank O. Hough, "the Marines, as they were to do so many times again in their long history, stacked arms, laid aside their fancy uniforms and set about to take care of their own needs."³ The project proceeded slowly because of other duties like fighting the Barbary pirates, and not until 1806 were the last bricks put in place.

Meanwhile, in 1804 Commandant Burrows resigned because of poor health. He was succeeded by Franklin Wharton, the first Commandant to occupy the Commandant's House. When the British captured Washington in 1814, Marines from the Barracks fought valiantly at Bladensburg, delaying the British advance for 2 hours. Unlike the adjacent Navy Yard, the Marine compound escaped unscathed from the British occupation. Although some have argued that the British spared the Barracks because of their admiration for Marine fighting qualities, it seems more likely they were saved by the pleas of private citizens whose adjacent property was endangered.

(continued)

³ Philip N. Pierce and Frank O. Hough, The Compact History of the United States Marine Corps (new York, 1964), 41.

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CONTINUATION SHEET Marine Corps ITEM NUMBER 8 PAGE three

A new era in Marine Corps history opened at the Barracks in 1820 when Archibald Henderson moved into the Commandant's House. For the next 38 years "under his leadership the Corps' status was clarified, its strength doubled, and its efficiency multiplied many times."⁴ Desirous of making the Marines the world's finest fighting men, Henderson required that every new officer of the Corps be stationed for a time at the Barracks, where they could receive training under his supervision. In 1836 Henderson led most of the Corps on an expedition to Florida against the Seminoles, and in 1859 a detachment of his men under Robert E. Lee captured John Brown at Harper's Ferry. When Henderson died in 1859, says historian Karl Schuon, "he left his Marine Corps with an esprit de corps and a heritage of tradition."⁵

During the Civil War, the Marines saw little significant action and in the early postwar years stagnated like the rest of the military establishment. One branch of the Corps prospered, however. The Marine Band had always been popular, playing for every President since John Adams, but it had not been recognized by law until 1861. In the 1880's, the band gained an international reputation under the leadership of John Philip Sousa, the "March King." While he served as band leader at the Washington Barracks from 1880 to 1892, Sousa wrote such favorites as "Stars and Stripes Forever," "Semper Fidelis," and the "Washington Post March." The latter, according to Arthur M. Schlesinger, with "its lively rhythm established the vogue of the two-step as successor to the old-time waltz."⁶

In the late 19th and early 20th centuries, American military power expanded as the United States became a global power. From 1891 to 1903 the Barracks witnessed another period of growth in the Marine Corps. Commandant Charles Heywood led the way in emphasizing new military tactics; establishing the School of

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4 Heinl, Soldiers of the Sea, 68.

5 Karl Schuon, Home of the Commandants (Washington, 1966), 169.

6 Schlesinger, Rise of the City, 306.

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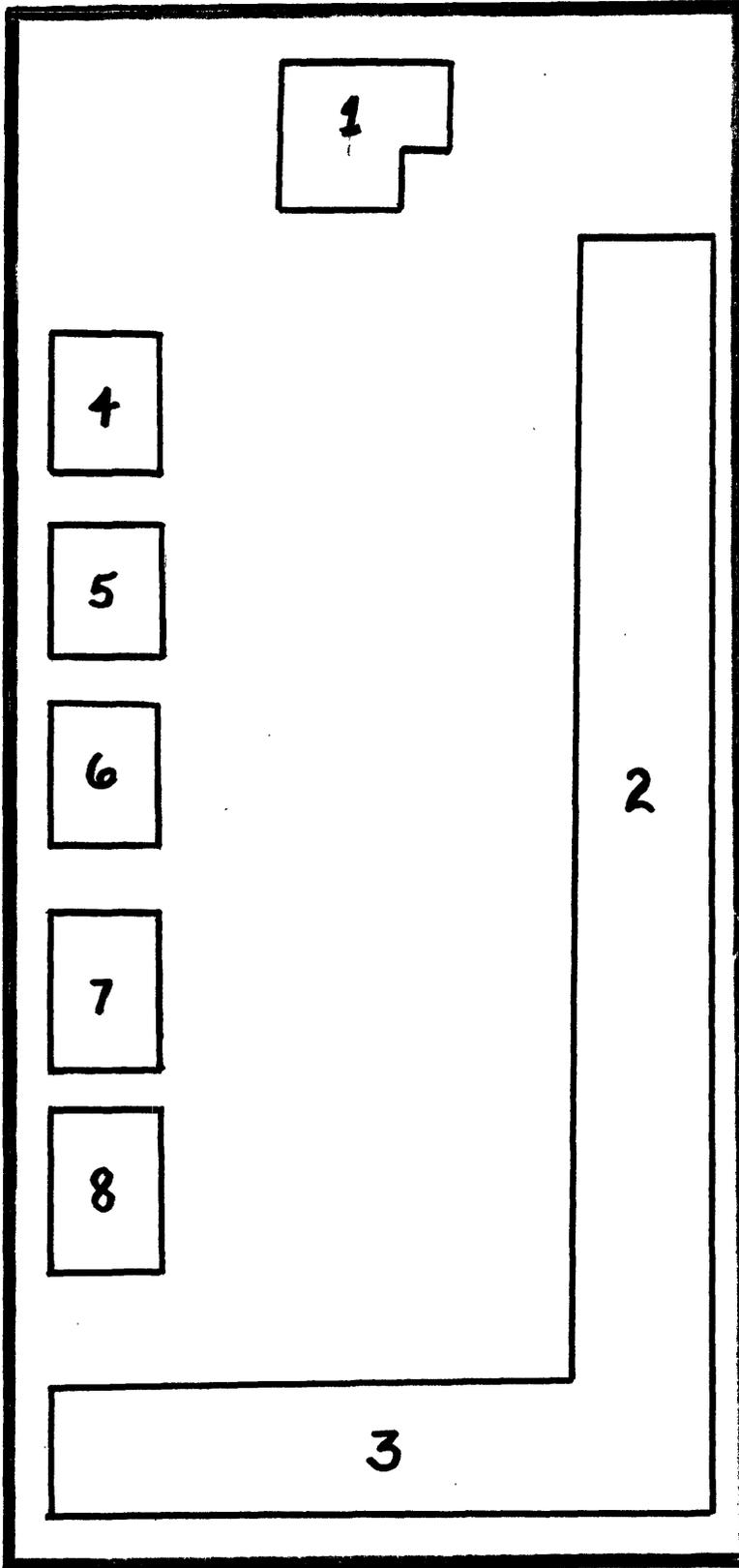
Application, an intensive training course for officers; and increasing the strength of the Corps fourfold.

Expansion of the Marine Corps in turn changed the function of the Barracks. In 1901 Marine headquarters were transferred to offices in downtown Washington, and in 1911 the Barracks lost its recruit training function when a recruit depot was established at Parris Island, S. Car. The Barracks also underwent extensive renovation, leaving the Commandant's House, completed in 1806, as the only structure remaining of the original complex. At present, the post's physical facilities occupy the original post bounds and include the Commandant's House, the headquarters of the Marine Band, a row of five officers' quarters, and barracks for a contingent of crack Marines who perform various ceremonial duties at the White House, Camp David, Arlington National Cemetery, and various national monuments.

G Street, SE.



Eighth Street



Ninth Street

I Street, SE.

Marine Corps Barracks and
Commandant's House
1-Commandant's House
2-Barracks
3-Band Hall
4-8--Officers' Quarters #1-5

Prepared by:
George R. Adam
AASLH, 1975
Not to Scale

35


ANC 6B
Capitol Hill / Southeast

921 Pennsylvania Ave SE
Washington, DC 20003
202.543.3344
FAX 202.543.3507

February 24, 2010

OFFICERS

Chairperson
David Garrison
Vice Chairperson
Ken Jarboe
Secretary
Kirsten Oldenburg
Treasurer
Carol Green
Parliamentarian
Neil Glick

Mrs. Catrina Harrison
Public Space Committee Coordinator
DC Department of Transportation
941 North Capital Street, N.E.
Suite 2104
Washington, DC 20001

**RE: PS # 54029, 821 G Street SE—Use of Public Space in front of the
Commandant's House**

Dear Mrs. Harrison:

At its regularly scheduled and properly noticed meeting on February 23, 2010 with a quorum present, ANC 6B voted unanimously (9-0) to support the application as presented.

COMMISSIONERS

SMD 1 *David Garrison*
SMD 2 *Mary Wright*
SMD 3 *Norman Metzger*
SMD 4 *Kirsten Oldenburg*
SMD 5 *Kenan Jarboe*
SMD 6 *Will Hill*
SMD 7 *Carol Green*
SMD 8 *Neil Glick*
SMD 9 *Michael Patterson*
SMD 10 *Francis Campbell*
SMD 11 *Vacant*

Very truly yours,



David F. Garrison
Chairperson

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921 Pennsylvania Ave SE
Washington, DC 20003
202.543.3344
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February 24, 2010

OFFICERS

Chairperson
David Garrison
Vice Chairperson
Ken Jarboe
Secretary
Kirsten Oldenburg
Treasurer
Carol Green
Parliamentarian
Vacant

Historic Preservation Review Board
DC Historic Preservation Office
Reeves Center
2000 14th Street, NW, Ste. 4000
Washington, DC 20009

RE: HPA # 08-318, 821 G Street, SE – Revised plan for security upgrades at Marine Barracks Commandant’s House

COMMISSIONERS

SMD 1 *David Garrison*
SMD 2 *Mary Wright*
SMD 3 *Norman Metzger*
SMD 4 *Kirsten Oldenburg*
SMD 5 *Kenan Jarboe*
SMD 6 *Will Hill*
SMD 7 *Carol Green*
SMD 8 *Neil Glick*
SMD 9 *Michael Patterson*
SMD 10 *Francis Campbell*
SMD 11 *Vacant*

Dear Board Members:

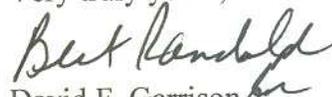
At a regularly called and properly noticed meeting on February 23, 2010, with a quorum present, ANC 6B voted unanimously (9 to 0) to support the applicant’s plans as presented.

The Commission is taking this action because, after reviewing all the submitted documentation, the Commission believes that this addition would not have any adverse affects on the neighbors or the character of the neighborhood.

Additionally, the Commission appreciates all the hard work put in by all parties concerned to arrive at a solution that provides an increased measure of security for the historic Commandant’s House without making it appear to be a fortified fortress.

Please notify the Commission if you have any questions or comments.

Very truly yours,


David F. Garrison
Chairperson

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**HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION**

Property Name:	Marine Corps Commandant's House	X	Agenda
Address:	801 G Street SE		Consent Calendar
Landmark/District:	Capitol Hill Historic District		
Meeting Date:	February 25, 2010	X	Concept Review
H.P.A. Number:	09-383		Alteration
Staff Reviewer:	Anne Brockett		New Construction

The United States Marine Corps proposes to make security improvements at Quarters 6, the residence of the Commandant, at 801 G Street SE. The Commandant's House was constructed in 1801-1806 with later additions. Together with the Marine Corps Barracks, it is a National Historic Landmark and lies within the Capitol Hill Historic District.

The application was initially was filed in May 2008 and since then, the Marines and their architect have revised the design in consultation with the HPO staff, Commission of Fine Arts, National Capital Planning Commission, DDOT, the Office of Planning Public Space Coordinator, and the Advisory Neighborhood Commission. Substantial changes have been made to address comments from these review bodies that have significantly improved the design.

The proposal seeks to do the following:

- Remove the historic (c. 1875-1880s) iron fence in front of the residence and install a 4'8" high fence in a complementary design in its place
- Restore and reuse the 3'6" high historic fence to the east and west of the new fence
- Install a decorative metal fence above the existing brick wall on 8th Street
- Install metal bollards at the northeast and northwest corners of the property inside the fence line
- Enlarge the tree boxes on G Street, which will incorporate two additional bollards at each corner
- Install two guard booths at the northeast and northwest corners of the property
- Remove significant amounts of paved surface in public space (currently used for vehicle parking) and replace it with landscaping

Earlier proposals sought to install a fence 7'6" in height and more than 50 bollards lining G Street and crossing the sidewalks at 8th and 9th Streets. The current proposal shows a fence height of 4'8" and replaces the need for bollards (which deter the threat of a vehicular attack) with controlled parking of vehicles. Parking would only be available to neighbors and Marine vehicles with permits issued by DDOT. This solution eliminates the need for almost all the bollards on G Street with virtually no change to the curbline. Bollards would remain at the more exposed corners of the property, but would be positioned behind the fence.

The fence proposed above the existing wall would complement the existing iron gates and fence at the Barracks and would replace the unsightly chain link fence that is currently in place.

The guard booths are intended for occasional use by posted guards to take relief from inclement weather conditions. They would be constructed of aluminum panels in an unassertive color similar to the stone along the top of the existing Barracks walls on 8th and 9th Streets. The booths have undergone considerable redesign and are less prominent and ornate than originally proposed in an effort to minimize their impact and blend them into the background.

Finally, the Marines have agreed to add significant greenspace in the public space at the east and west ends of the project area in areas that are currently paved and used for vehicular parking. The design reflects new planting areas between existing access points into the property and will prevent vehicle parking here as well as allow entry into the Barracks for visitors.

Evaluation and Recommendation

The proposal represents a respectful and balanced compromise between security and preservation goals. While guard booths would not typically be appropriate for public space, they are not an unusual or unexpected feature for a military installation, and have been designed to be subordinate to both the site and the Commandant's House. Together with the modestly taller new fence, the restoration and reuse of the historic fence, replacement of chain link fencing with decorative metal, the clever parking management plan that greatly reduces the number of bollards, and the removal of paving and parking from public space, the project is a compatible solution that has been designed to significantly mitigate its potential adverse effects.

The HPO recommends that the Board approve the security upgrades in concept as designed as consistent with the purposes of the Preservation Act and delegate of final approval to staff.

APPENDIX B

General Conformity Rule Analysis

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B.1 Clean Air Conformity

The 1990 amendments to the Clean Air Act (CAA) require federal agencies to ensure that their actions conform to the appropriate State Implementation Plan (SIP) in a nonattainment area. The SIP is a plan that provides for implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS). It includes emission limitations and control measures to attain and maintain the NAAQS. As defined in the CAA, conforming to a SIP also requires conforming to its purpose to reduce the severity and number of violations of the NAAQS. The federal agency responsible for an action is required to determine if its action conforms to the applicable SIP.

NOTE: the analysis presented in this appendix was conducted based on an earlier version of the proposed action (Concept D, briefly described in Section 2.2.2.6) that included one guard station only and a row of bollards on the sidewalk in front of the Commandant's House. However, because the elimination of the row of bollards from the proposed action can be expected to offset the construction of a second guard station for the purposes of the air emission analysis, and because of the very low emission levels calculated for Concept D, which could be multiplied a hundredfold and still remain well below the significance thresholds, the analysis remains valid for the purposes of determining the applicability of the GCR to the proposed action.

The US Environmental Protection Agency (USEPA) has developed two sets of conformity regulations, with federal actions differentiated into transportation projects and non-transportation projects:

- Transportation projects are governed by the "transportation conformity" regulations (40 CFR Parts 51 and 93), which became effective on December 27, 1993 and were revised on August 15, 1997.
- Non-transportation projects are governed by the "general conformity" regulations (40 CFR Parts 6, 51 and 93) described in the final rule for *Determining Conformity of General Federal Actions to State or Federal Implementation Plans* that was published in the *Federal Register* on November 30, 1993. The general conformity rule became effective January 31, 1994 and has not been updated since then.

Since the proposed action is a non-transportation project, only the general conformity rule applies. This general conformity

applicability analysis is prepared as an appendix to the environmental assessment for perimeter security upgrades at the US Marine Corps (USMC) Commandant's House (Quarters 6) at the Main Post of the US Marine Barracks in Washington, DC. The proposed security upgrades include the construction of a new fence system, which will include a permanent guard station, in front of the house and the installation of curb-side bollards.

B.2 General Conformity

B.2.1 Attainment and Nonattainment Areas

The general conformity rule applies to federal actions occurring in air basins designated as nonattainment for the NAAQS or in attainment areas subject to maintenance plans (or maintenance areas). Federal actions that occur in air basins which are in attainment with the NAAQS are not subject to the conformity rules.

A criteria pollutant is a pollutant for which an air quality standard has been established under the CAA. The designation of nonattainment is based on over-exceeding or violating the air quality standard. A maintenance plan establishes measures to control emissions to ensure the air quality standard is maintained in areas that have been designated as attainment from a previous nonattainment status.

Under the requirements of the 1970 Clean Air Act (CAA), as amended in 1977 and 1990, the USEPA established standards (i.e., the NAAQS) for six criteria pollutants: carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), inhalable particulate matter (PM₁₀ and PM_{2.5}), and lead (Pb).

Areas that meet the NAAQS standard for a criteria pollutant are designated as being in "attainment;" areas where the criteria pollutant level exceeds the NAAQS are designated as being in "nonattainment". O₃ nonattainment areas are subcategorized based on the severity of their pollution problem (marginal, moderate, serious, severe, and extreme). Particulate Matter (PM) and CO nonattainment areas are classified into two categories (moderate and serious). When insufficient data exists to determine an area's attainment status, it is designated unclassifiable (or attainment).

The proposed action would occur at USMC Commandant's House located at the Marine Barracks, Washington, DC. The area around

the Commandant's House is currently designated as a nonattainment area for PM_{2.5}, a moderate nonattainment area for 8-hour O₃, and an attainment area for the other five criteria pollutants (i.e., CO, NO₂, SO₂, Pb, and PM₁₀). O₃ is formed when nitrogen oxides (NO_x) and volatile organic compounds (VOCs) interact; and SO₂ is considered a precursor of PM_{2.5}.

B.2.2 De Minimis Emission Levels

Federal actions with significant air quality impacts are those that exceed threshold rates of emissions (*de minimis*) established in the final rule. A formal conformity determination is required when the annual net total of direct and indirect emissions from a federal action occurring in a nonattainment or maintenance area equals or exceeds the applicable annual *de minimis* level. Table B-1 lists the *de minimis* level by pollutant.

The USEPA established *de minimis* for O₃ precursors, VOCs, and NO_x for O₃ nonattainment areas on the basis that VOCs and NO_x reductions will contribute to reductions in O₃ formation. Since the project site is located in an O₃ moderate nonattainment area which is in an O₃ transport region, the following *de minimis* levels apply: 100 tons per year (tpy) of NO_x and 50 tpy of VOCs.

For PM_{2.5} nonattainment areas, the USEPA established *de minimis* for both PM_{2.5} and its precursor, SO₂. Although the project area is currently designated as being in attainment for SO₂, SO₂ was considered in the analysis as a precursor of PM_{2.5}. The *de minimis* level of 100 tpy would apply for both PM_{2.5} and SO₂.

B.2.3 Regional Significance

Any federal action that does not exceed the applicable *de minimis* may still be subject to a general conformity determination if the direct and indirect emissions from the proposed action exceed ten percent of the total emission inventory for a particular criteria pollutant in a nonattainment or maintenance area. If the emissions exceed the ten-percent threshold, the federal action is then considered to be a "regionally significant" activity, and the general conformity rules apply.

Table B-1
De Minimis Emission Levels for Criteria Air Pollutants

Pollutant	Nonattainment Designation	Tons/Year
Ozone (O ₃) *	Serious	50
	Severe	25
	Extreme	10
	Other nonattainment or maintenance areas outside ozone transport region	100
	Marginal and moderate nonattainment areas inside ozone transport region	50/100**
Carbon Monoxide (CO)	All	100
Sulfur Dioxide (SO ₂)	All	100
Lead (Pb)	All	25
Nitrogen Dioxide (NO ₂)	All	100
Particulate Matter (PM ₁₀) ≤ 10 microns	Moderate	100
	Serious	70
Particulate Matter (PM _{2.5}) ≤ 2.5 microns***	All	100
Notes:		
*Applies to ozone precursors, volatile organic compounds (VOCs) and nitrogen oxides (NO _x).		
**VOCs/NO _x		
*** Applies to PM _{2.5} and its precursors.		

B.2.4 Analysis

This General Conformity Rule (GCR) analysis was conducted in accordance with guidance provided by the USEPA report (USEPA, November 30, 1993) titled: *Determining Conformity of Federal Actions to State or Federal Implementation Plans* (40 CFR Parts 6, 51, and 93).

The analysis was performed to determine whether the proposed action would be consistent with the GCR and whether a formal conformity analysis would be required. Pursuant to the GCR, all reasonably foreseeable emissions (both direct and indirect) associated with the construction of the proposed security enhancements were quantified and compared to the applicable annual *de minimis* to determine potential air quality impacts.

The conformity analysis for a federal action examines the impacts of the direct and indirect net emissions from mobile and stationary sources. Direct emissions are emissions of a criteria pollutant or its precursors that are caused or initiated by a federal action and occur at the same time and place as the

action. Indirect emissions, occurring later in time and/or further removed in distance from the action itself, must be included in the determination if both of the following apply:

- The federal agency can practicably control the emissions and has continuing program responsibility to maintain control.
- The emissions caused by the federal action are reasonably foreseeable.

Under the Proposed Action, the Marine Barracks facility is proposing to:

- Divide the existing fence in half and relocate it to the east and west of the Commandant's house.
- Reinforce the relocated fence by setting it on a short (4 inches) curb which will be set on a below-grade concrete foundation approximately 2 feet, 6 inches deep. The fence will include a parallel line of bollards behind the fence.
- Install a new fence in front of Commandant's House in the area vacated through relocation of the existing fence.
- Install reinforced, decorative curb-side bollards stretching the length of the Commandant's House.
- Construct a permanent guard post on the east side of the Commandant's House.

Increased direct and indirect NO_x, VOCs, PM_{2.5}, and SO₂ emissions from the proposed construction activities, over which the USMC has control, would result from the use of diesel and gas-powered construction equipment. For estimating annual emissions, the proposed action is assumed to take place entirely in 2009.

In estimating NO_x, VOC, PM_{2.5}, and SO₂ emissions, the usage of equipment and the duration of specific construction activities were first determined based on the RSMeans handbook and past field experience in estimating construction activities. The increased emissions were then calculated using the USEPA guidance and emission factors.

B.3 Emission Determination

The GCR requires that potential emissions generated by any project-related activities be determined on an annual basis and compared to the annual *de minimis* levels for those pollutants (or their precursors) for which the area is in nonattainment or maintenance. Emissions attributable to construction activities at the Main Post of the US Marine Barracks in Washington, DC were analyzed for NO_x, VOCs, PM_{2.5}, and SO₂.

B.3.1 Construction Activities

A construction estimate to identify equipment, material and manpower requirements for the construction of a fence at the US Marine Corps (USMC) Commandant's House at the Main Post of the US Marine Barracks in Washington, DC was completed. Estimates of construction crew and equipment requirements and productivity were based on data presented in:

- "2003 RSMeans Facilities Construction Cost Data", R.S. Means Co., Inc., 2002

The assumptions and calculations presented below are based on the planning-level description of the proposed action in Chapter 2. The proposed action includes the following elements:

- Relocating the existing 3'-3" high fence from its current location and reinstalling it on a new alignment, reinforcing the existing fence on a short (4") curb on a below-grade (2'-6") foundation including a parallel line of bollards; installing gardens behind old fence.
- Installing a new 5'-foot high fence in front of the commandant's House.
- Installing a permanent 39 square feet (SF) guard post.
- Installing curb-side bollards along G Street in front of the Commandant's House.

Fence Relocation

It is assumed that fence relocation consists of removing the existing cast-iron fence, demolishing the sidewalk in the area to be converted to fence/garden, excavation for footing installations, and reinstallation of the cast-iron fence.

- Fence removal - no relevant means item available. Assume 2 hours labor of a 2 Carp crew plus use of electric hand tool is required per post (4 per day) for removal. Existing fence posts are ~5-ft OC, 154 linear feet (LF) = 32 posts.
- Sidewalk demolition, use item 02220-875-4200, Concrete sidewalk removal, plain 4" thick, mesh reinforced. 2,281 SF = 254 square yard (SY).
- Fence footings - assume auger drill rig is used to excavate footing holes, item 02210-310-0650, auger holes in earth, no samples, 4" diameter. Reduce productivity by 75% to account for larger diameter and reduced productivity due to frequent relocation of drill rig. Relocated fence has posts 5-ft OC, 146 LF = 29 posts; say 30 x 2.5 LF = 75 LF of auger holes.
- Footing formwork, assume one-use 8" diameter fiber forms are used, item 03110-410-1500, 75 LF.
- Footing, use item 03310-240-0700, 12" x 12" columns, minimum reinforcing (used as rough equivalent measure due to lower productivity than the smallest circular column [16"]). 30 circular 8" columns x 2.5' depth = 30 columns x 0.9 cubic feet (CF) per column = 26.2 CF = 1 CY.
- Curbing around garden area - use item 02770-225-2100, Indian granite curbing, jumbo blocks, grey; 146 LF.
- Reinstallation of fence, no relevant Means item available. Assume 1 hour labor of a 2 Carp crew & small crane per post (8 per day) to install fence; 30 posts.

New Fence Installation

It is assumed that new fence installation consists of demolishing an existing concrete fence base, excavation for footing installations, and installation of the new cast-iron fence. It is further assumed that the existing fence base predates AT/FP requirements, and is a simple linear curb-type foundation.

- Existing fence base demolition, use item 02220-875-2500, reinforced concrete curb demolition, 154 LF.
- Fence footings - assume auger drill rig is used to excavate footing holes, item 02210-310-0650, auger holes in earth, no samples, 4" diameter. Reduce productivity by 75% to account for larger diameter and

reduced productivity due to frequent relocation of drill rig. Relocated fence has posts 5-ft on center (OC), 154 LF = 32 posts; 32 x 2.5 LF = 80 LF of auger holes.

- Footing formwork, assume one-use 8" diameter fiber forms are used, item 03110-410-1500, 80 LF.
- Footing, use item 03310-240-0700, 12" x 12" columns, minimum reinforcing (used as rough equivalent measure due to lower productivity than the smallest circular column [16"]). 30 circular 8" columns x 2.5' depth = 32 columns x 0.9 CF per column = 28.8 CF = 1.1 CY.
- New curbing around garden area - use item 02770-225-2100, Indian granite curbing, jumbo blocks, grey; 154 LF.
- Installation of fence, no relevant Means item available. Assume 1 hour labor of a 2 Carp crew & small crane per post (8 per day) to install fence; 32 posts.

Guard Post Installation

It is assumed that the guard post would be a pre-engineered building, delivered with lights, fixtures & installation pre-installed. Site work to prepare foundation and provide utilities is required; otherwise, installation requires only delivery and crane time.

- For foundation, use item 02220-550-0440 foundation floor, slab on grade 6" thick, reinforced with rods, 36 SF.
- Electrical distribution, assume 100 LF, SEU service entrance, copper, 1/0 + 1/0 neutral (Electric service) (item 16120-550-4200) and Elec/Comm conduit, direct burial, PVC Schedule 40, 6" diameter (line 02580-250-1090). Assume utility trench provided by pavement demolition crew at minimal additional effort.

Bollard Installation

It is assumed that bollard installation consists of coring the sidewalk at each location, excavation for footing installation, placement of forms, reinforcement and concrete, and installation of the new bollard on the foundation.

- Concrete coring, use item 02210-320-1500, 14" diameter core (oversized to provide work space), up to 6" slab. 68 cores (1 per bollard).
- Fence footings - assume auger drill rig is used to excavate footing holes, item 02210-310-0650, auger holes in earth, no samples, 4" diameter. Reduce productivity by 75% to account for larger diameter and reduced productivity due to frequent relocation of drill rig. 68 bollards x 3.25 LF per bollard = 221 LF of auger holes.
- Footing formwork, assume one-use 12" diameter fiber forms are used, item 03110-410-1600, 221 LF.
- Footing, use item 03310-240-0740, 12" x 12" columns, maximum reinforcing (used as rough equivalent measure due to lower productivity than the smallest circular column [16"]). 68 bollards, 12" columns x 3.25' depth = 68 footings x 2.6 CF per column = 176.8 CF = 6.5 CY.
- Installation of bollards. No relevant Means item available. Assume 1 hour labor of a 2 Carp crew & small crane plus operator per bollard (8 per day) to install bollards; 68 bollards.

B.3.2 Construction Equipment Operations and Emissions

The number and type of equipment necessary for construction activities were determined for each part as discussed above. All equipment was assumed to be diesel-powered unless otherwise noted. Each piece of equipment is assumed to be operated continuously during each working day, which is equivalent to eight hours per day. Pieces of equipment to be used include, but are not limited to:

- Augur rig.
- Backhoe loader.
- Compressors.
- Concrete pumps.
- Core drill.
- Cranes.
- Gas engine vibrators.
- Generator.
- Pavement breaker.
- Dump trucks.

- Flatbed truck.
- Tractor trucks.

It is assumed that the total cumulative on-site truck idling time will be six hours per day. Estimates of construction equipment emissions were based on the estimated hours of usage and emission factors for each motorized source for the project. Emission factors for NO_x, VOCs, PM_{2.5}, and SO₂ related to heavy-duty diesel equipment were obtained from *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition* (USEPA, 2004). NO_x, VOCs, PM_{2.5}, and SO₂ emission factors for gas heavy-duty equipment were obtained from *Exhaust Emission Factors for Nonroad Engine Modeling: Spark-Ignition* (USEPA, 2005). Emission factors are available for hydrocarbons (HC), which include all VOCs as well as other non-VOC constituents; therefore, HC emissions may be slightly higher than VOC emissions. For the purposes of this analysis the term VOC was used, but emission factors included all HC emissions.

Emission factors in grams of pollutant per hour per horsepower were multiplied by the estimated running time and equipment associated average horsepower provided by the USEPA to calculate total grams of pollutant from each piece of equipment. Average horsepower values were obtained from *Nonroad Engine and Vehicle Emission Study - Report* (USEPA, 1991). Finally, these total grams of pollutant were converted to tons of pollutant.

The USEPA recommends the following formula to calculate hourly emissions from nonroad engine sources including cranes, backhoe, etc.:

$$M_i = N \times HP \times LF \times EF_i$$

where:

- M_i = mass of emissions of ith pollutants during inventory period;
- N = source population (units);
- HP = average rated horsepower;
- LF = typical load factor; and
- EF_i = average emissions of ith pollutant per unit of use (e.g., grams per horsepower-hour).

Typical load factor values were obtained from *Median Life, Annual Activity, and Load Factor Values for Nonroad Engine Emissions Modeling* (USEPA, 2004). Estimated emissions from operation of on-site construction equipment are presented in

Table B-2. A sample calculation for a compressor, NO_x emissions during construction is provided below:

Operational Hours = 12 hours (1 compressor x 2 days x 6 hr/day)

Operational Emissions = 12 hours x 37 hp x 43% x 8.30 grams/hp-hr
 = 0.002 tons (see Table B-2)

Table B-2

2009 Proposed Action Construction Equipment Emissions Worksheet

Equipment Type (number)	Total Hours of Operation	Horse power ¹ (HP)	Load Factor ² (%)	Emission Factor ^{3,4} (grams/HP-hr)				Emissions (tons)			
				VOC	NO _x	PM2.5	SO ₂	VOC	NO _x	PM2.5	SO ₂
Demolition											
Backhoe loader, 48hp	30	77	59	0.99	8.30	0.70	0.14	0.001	0.012	0.001	0.000
Construction											
Auger rig, 4"to36" diam	174	209	43	0.68	8.38	0.39	0.13	0.012	0.144	0.007	0.002
Compressor, 250 cfm	12	37	43	0.99	8.30	0.70	0.14	0.000	0.002	0.000	0.000
Concrete pump, small	12	80	59	0.99	8.30	0.70	0.14	0.001	0.005	0.000	0.000
Core rill, large	66	80	59	0.99	8.30	0.70	0.14	0.003	0.028	0.002	0.000
Crane, hydraulic, 12 ton	90	80	59	0.99	8.30	0.70	0.14	0.005	0.039	0.003	0.001
Gas engine vibrator	12	8	43	0.99	8.30	0.70	0.14	0.000	0.000	0.000	0.000
Generator	90	22	43	0.99	8.30	0.70	0.14	0.001	0.008	0.001	0.000
Pavement breaker, 60lb	18	99	59	0.99	8.30	0.70	0.14	0.001	0.010	0.001	0.000
Trucks	90	489	59	0.99	8.30	0.70	0.14	0.028	0.237	0.020	0.004
Total 2009 Construction Equipment Emissions								0.052	0.486	0.036	0.008
Source:											
¹ Nonroad Engine and Vehicle Emission Study-Report. USEPA, 1991.											
² Median Life, Annual Activity, and Load Factor Values for Nonroad Engine Emissions Modeling. USEPA, 2004.											
³ Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling - Compression-Ignition. USEPA, 2004.											
⁴ Exhaust Emission Factors for Nonroad Engine Modeling: Spark-Ignition. USEPA, 2005.											

B.4 Compliance Analysis

Based on the results of this analysis of NO_x, VOC, PM_{2.5}, and SO₂ emissions performed in conjunction with the Final Rule of *Determining Conformity of Federal Actions to State or Federal Implementation Plans*, (USEPA, November 30, 1993), the Proposed Action would not require a formal conformity determination. The results of this analysis, as presented in Table B-3, show that the Proposed Action does not exceed the *de minimis* criteria of 100 tpy for NO_x, PM_{2.5}, and SO₂; and also does not exceed 50 tpy of VOC on an annual basis. Furthermore, the project would not be regionally significant since the project resulted emissions would not make up ten percent or more of regional emission inventory for NO_x, VOC, PM_{2.5}, and SO₂. Therefore, the Proposed Action would have minimal air quality impact and would not require a formal conformity determination.

Table B-3

Total Annual Emissions Levels

Emission Source	Pollutant (tons/year)			
	VOC	NO _x	PM _{2.5}	SO ₂
Diesel Equipment	0.05	0.49	0.04	0.01
<i>De Minimis Level</i>	50	100	100	100
10% 2009 Regional Emission Inventory	12,702	13,213	2,336	23,190

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