

**REVISED FINDING OF NO SIGNIFICANT IMPACT
FOR SITE IMPROVEMENTS AT THE MARY E. SWITZER BUILDING
WASHINGTON, DC**

FINDING

In accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), U.S. General Services Administration (GSA) Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide, I find that the site improvements at the Mary E. Switzer Building, as described in the attached Environmental Assessment (EA), is not a major Federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement will not be prepared.

APPROVED: _____

Date: 04-01-11

Julia E. Hudson
Regional Administrator
U.S. General Services Administration
National Capital Region

This FONSI will become final 30 days after publication of its Notice of Availability in the Washington Post, provided that no information leading to a contrary finding is received or comes to light during the 30-day review period.

BASIS FOR FINDING

GSA prepared an environmental assessment (EA) analyzing the environmental impacts that could result from the site improvements at the Mary E. Switzer Building. The Final EA and Finding of No Significant Impact (FONSI) were released to the public in July 2010. The EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), GSA Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide. The EA documents the direct, indirect, and cumulative impacts of three action alternatives and a No Action alternative.

At the time the EA was prepared and the FONSI was released, GSA had selected Alternative B as the preferred alternative. Based on the fact that Alternative A more fully meets the purpose and need for the action, through providing more welcoming pedestrian space, providing greater greenspace, and enhancing sustainability, GSA has selected Alternative A for implementation. The selection of Alternative A is also supported by comments received from review agencies during both the NEPA and the design approvals processes.

Alternative A as presented in the Final EA was a preliminary concept; GSA has further refined the design and the Revised FONSI discloses the changes to the design. The majority of the resource areas did not require additional analysis, however GSA updated the traffic study to provide updated information on traffic conditions in the area and to assess the impacts of refinements to the design. Revisions to the traffic study are further explained in Section IV, Environmental Consequences.

The environmental issues addressed in the EA were identified through early public involvement (scoping), which included consultations with Federal and local agencies and other stakeholders. The Final EA responded to comments and concerns received during the 30-day scoping period. The Final EA is incorporated by reference into this Revised FONSI.

I. PURPOSE OF AND NEED FOR THE PROPOSED ACTION

The purpose of the proposed action is to create a welcoming outdoor plaza for employees, visitors, and the public; to enhance pedestrian safety and circulation through widening the sidewalks on C Street SW between 3rd and 4th Streets; to improve vehicular circulation on 3rd and 4th Streets SW through relocating entrances to the surface parking lot; and to provide Level IV protection for the facility. In addition, GSA would seek to incorporate sustainability measures into the design in compliance with Executive Order 13514, Federal Leadership in Environmental, Energy and Economic Performance.

The site improvements are necessary to meet the needs of area employees, improve the appearance and utility of the site, and provide the required level of security.

II. DESCRIPTION OF ALTERNATIVES

Four alternatives were considered in detail in this EA, three action alternatives and a No Action alternative. The essential characteristics of these alternatives as documented within the EA are summarized below. In addition, relevant refinements to Alternative A that have occurred since the release of the EA are also presented.

No Action Alternative

Under the No Action Alternative, site improvements would not be undertaken at the Switzer Building. The surface parking lot on the north face of the building would remain and perimeter security elements would not be established. Further, C Street would not be narrowed and area sidewalks would not be widened. Finally, no Low Impact Development (LID) measures would be installed on the site of the Switzer Building.

Elements Common to All Action Alternatives

Under each of the action alternatives, C Street, SW, between 3rd and 4th Streets, would be narrowed to a single lane in each direction. This would allow for the sidewalks to be widened on the north and south sides of the street such that the existing vents would no longer serve as physical obstructions to pedestrians. Bulb-outs at the corners of 3rd and C Streets, and 4th and C Streets would frame a line of parallel parking spaces on both sides of the vehicular right-of-way. Curb cuts and entrance ramps would be installed to make the site accessible and compliant with the Americans With Disabilities Act (ADA).

Each action alternative would include a landscaped plaza on the north side of the building on the site of the existing surface parking lot. Each would also include LID measures in the design. Landscape planting within the plaza and around the building would utilize sustainable plant materials, and street trees would be installed to create a consistent green edge along the right-of-way. The action alternatives would all include a public art element and permanent perimeter security measures. Along C Street SW, the perimeter security measures would be incorporated into the landscaped plaza design and the existing ramp wall would be hardened. Perimeter security measures along 3rd and 4th Street SW would be located at the edge of the building yard and setback approximately 20 feet from the building face. Installation of perimeter security along D Street SW would be located two feet from the edge of curb and would follow the alignment planned at Federal Office Building 8, one block east of the site.

Each of the action alternatives would also involve the installation of a back-up generator in the below-grade service area shared by the Switzer and Cohen buildings. The emergency generator would replace the temporary generator that is currently located above grade within the surface parking lot on the south side of the Cohen Building.

The action alternatives would also employ a ground source heat pump. The pump system would be installed below the surface of the landscaped plaza and would assist in heating and cooling the Switzer Building. The size of the system would be determined after energy efficiency tests are performed.

Alternative A

Under Alternative A, the entire existing surface parking lot on the north side of the building would be converted to a landscaped plaza. The proposed design would combine both open lawn and fully planted landscaped panels.

As documented above, while the concept of the Alternative A design remains the same as that presented within the EA, there have been minor revisions to the design based on comments received during the approvals process. In the revised design, the rectilinear paths have been replaced by a curved path that draws pedestrians from the corners of 3rd and C Streets, and 4th and C Streets to the building entrance. A small playground is included at the west end of the plaza. Although the design could require the removal of two additional mature trees on the site beyond the five mature trees identified within the EA, overall treecover would be increased substantially beyond existing conditions. Although a public art element might still be located within the plaza, such an element would not be used to conceal the exhaust vents on C Street SW. Instead, two architectural elements or pavilions may be located along C Street SW and could be used to accommodate venting requirements. Finally, the C Street right-of-way would be narrowed at the center of the block to allow for a mid-block crossing and to facilitate connections to the Cohen Building to the north. This would require the removal of eight metered parking spaces on the south side of C Street SW.

A coffee/concession stand accessible to the public may be installed at the east end of the plaza.

Alternative B

Alternative B proposes to convert the existing surface parking lot to a landscaped plaza. The landscaped plaza design would include open lawn panels opposite the two entrances with fully planted landscaped panels flanking the lawns on the east and west ends. Surface parking for approximately 11 vehicles would be located at the center of the plaza and would be bordered on 4 sides by planting beds. The lot would be designed such that it could serve as an additional outdoor venue when not used for parking.

Alternative C

Alternative C proposes to convert the existing surface parking lot to a landscaped plaza. The landscaped plaza design would include open lawn panels opposite the two entrances with fully planted landscaped panels flanking the lawns on the east and west ends. Surface parking for approximately 28 vehicles would be located at the center of the plaza and would be bordered on the north, east, and west sides by planting beds. The lot would be designed such that it could serve as an additional outdoor venue when not used for parking.

III. SELECTED ALTERNATIVE

While all action alternatives would meet the overall purpose and need of the proposed action, GSA has selected Alternative A for implementation . Alternative A would best achieve a site that employs sustainable features in its design and is inviting to both employees and visitors, while still incorporating physical security elements into the landscape. Alternative A would decrease the amount of hard surfaces and result in welcoming landscaped areas and the incorporation of sustainable measures into the site.. Further, Alternative A would result in a pedestrian-friendly site that allows for safe circulation through the site to nearby existing or planned attractions. Alternative A would be in compliance with a number of Federal and District of Columbia policies and guidelines including but not limited to, the *Public Buildings Cooperative Use Act of 1976*, *Comprehensive Plan for the National Capital: Federal Elements (2004)*, *Comprehensive Plan for the National Capital: District Elements (2006)*, *Executive Order 13514: Federal Leadership in Environmental, Energy and Economic Performance*, *GSA's Site Security Design Guide*, and *GSA's Achieving Great Federal Spaces: A Property Manager's Guide*.

IV. ENVIRONMENTAL CONSEQUENCES

Several issues were initially considered for evaluation in the EA, but were eliminated from detailed study because short- and long-term impacts would be negligible in intensity. These issues are economic and fiscal resources, community facilities, hazardous materials, floodplains and wetlands, demographics and environmental justice, wildlife, and climate change.

The following is a summary of the impacts associated with implementing Alternative A, the selected alternative. Where applicable, mitigation measures have been identified. A full description of the impacts from implementing any of the action alternatives can be found in the Final EA. Where impacts are different than those outlined within the EA, due to refinements to the design, the new impacts have been noted.

Land Use

Long-term beneficial impacts would result from the conversion of surface parking to a fully landscaped plaza.

Planning Policy

Long-term beneficial impacts and minor adverse impacts would result from the removal of some existing street trees and locating some security features within public space.

Mitigation Measures

- National Capital Planning Commission's (NCP) *National Capital Urban Design and Security Plan* and *Security Plan Policies and Objectives* should be followed to ensure the form and materials of the proposed perimeter security elements respond to the Switzer Building and its surroundings.
- Coordination with District of Columbia Department of Transportation (DDOT) and their Urban Forestry Administration regarding guidelines in the *Public Realm*

Design Handbook and the *Design and Engineering Manual* should occur to ensure standards are met.

Public Space

Impacts to public space would be moderate with beneficial impacts resulting from the installation of the fully landscaped plaza on C Street.

Mitigation Measures

- As the design progresses coordination with DDOT regarding guidelines presented in their *Design and Engineering Manual* and *Public Realm Handbook* would be required.
- GSA will obtain a public space permit for any elements that would be located in land controlled by the District of Columbia. As part of that process, GSA has initiated preliminary discussions with DDOT and District of Columbia's Office of Planning. GSA will continue to coordinate with the District, including presenting the design at DDOT's Preliminary Design Review Meeting and to the District's Public Space Committee.

Historic Resources

Long-term minor to moderate adverse impacts to the Switzer Building; long-term moderate adverse impacts to the L'Enfant Plan; long-term minor adverse impacts to the Cohen Building; negligible impact to the Lyndon B. Johnson and Hubert Humphrey Buildings would result from implementing the proposed action.

Mitigation Measures

- Mitigation for impacts to historic resources will be determined during the Section 106 consultation process being conducted in compliance with the National Historic Preservation Act. The 106 consultation process is discussed in more detail in *Section VI. Section 106 of the National Historic Preservation Act*.

Archaeological Resources

During ground disturbing activities for the landscaped plaza, the ground source heat pump, and perimeter security archaeological resources may be encountered resulting in the potential for adverse impacts.

Mitigation Measures

- Mitigation for impacts to archaeological resources will be determined during the 106 consultation process. The 106 consultation process is discussed in more detail in *Section VI. Section 106 of the National Historic Preservation Act*.

Visual Resources

Long-term moderate adverse impacts may result from placement of perimeter security elements in the public realm on D Street SW, and minor adverse impacts may occur from their installation on 3rd and 4th Streets SW. The visual impacts of art or architectural elements were analyzed in the EA. It was determined that the adverse impact to visual

quality increases as the height of the elements increases. Decreasing the height of the elements would lessen the intensity of the visual impact. Long-term beneficial impacts may result from the addition of new street trees around the site and from replacement of surface parking with a fully landscaped plaza on the north side of the site.

The EA evaluated the impacts of two architectural elements on C Street SW. As the design has progressed, GSA is considering seating pavilions as the architectural elements. The design is still under development and may be further refined through consultation with CFA, NCPD, and the DC SHPO.

Mitigation Measures

- To the extent possible, the physical features providing perimeter security at the curblines on D Street SW should consist of hardened streetscape elements, such as streetlights, trash receptacles, and bike racks, to minimize the visual impact of the improvements. In addition, as the design for D Street, SW progresses, GSA will explore options that may allow the security line to modulate to reduce its visual impact.
- The conceptual design for the site improvements will be refined through coordination with review agencies, including the Commission of Fine Arts (CFA), the DC State Historic Preservation Office (SHPO), and NCPD.
- GSA, in accordance with mitigation measures determined during the Section 106 consultation process, will limit the height and massing of the architectural elements and/or pavilions on C Street SW. The Section 106 consultation process is discussed in more detail in *Section VI. Section 106 of the National Historic Preservation Act*.

Vegetation

The EA evaluated the loss of five trees with a circumference of greater than 55". Under the revised design, two additional mature trees would be lost. However, overall tree cover on the site would increase. Thus, minor to moderate adverse impacts would result from removal of existing street trees and other on-site vegetation; these impacts would persist until the replacement trees are established and reach maturity. Long-term beneficial impacts would result from the conversion of surface parking to a fully landscaped plaza and the installation of new street trees that would form a consistent green edge along each of the streets.

Mitigation Measures

- Coordinate with DDOT's Urban Forestry Administration regarding tree plantings in public space and comply with the Urban Forestry Administration's Special Tree Removal Permit as necessary.
- Where feasible, preserve additional mature trees as the detailed design progresses.
- Where feasible, GSA will salvage and re-use mature landscaping either at Switzer Building or at other GSA-controlled Federal buildings in the National Capital Region.

Stormwater Resources

Minor short-term adverse impacts may result to stormwater due to increased sediment flows during construction. Long-term beneficial impacts would result from the reduction of impervious surfaces at the site and employing LID measures for managing stormwater on-site.

Mitigation Measures

- Employ best management practices during construction to minimize sediment loads in stormwater runoff.
- Consult with District of Columbia Water and Sewer Authority (DC WASA) and DDOT regarding any relocation or reconstruction of existing storm drains due to new construction at the site.

Geophysical Resources

Moderate short-term construction-related impacts to soils and groundwater may result due to site construction activities, excavation, and drilling during the installation of the ground source heat pump. Long-term beneficial impacts to groundwater would result from implementing stormwater management practices.

Mitigation Measures

- Employ best management practices during construction to minimize sediment loads in stormwater runoff.
- Installation of the ground source heat pump would follow International Ground Source Heat Pump Association (IGSHPA) guidelines as well as local, state, and Federal guidelines and regulations.
- Collect and test soil samples during drilling for ground source heat pumps for potential contamination, if contamination is found follow local, state, and Federal guidelines and regulations for disposal.
- Test water collected during drilling for ground source heat wells for potential contaminants.
- In the event that dewatering is necessary, it would be undertaken in compliance with all local and federal permits, and DC WASA permitting processes.

Vehicular Circulation

The EA evaluated the traffic impacts of each of the three action alternatives. As a result of ongoing consultation with DDOT, a traffic study has been undertaken to provide updated information on traffic conditions in the area and to assess the impacts of refinements to the design. The 2011 Draft Traffic Study documents that the existing intersections in the vicinity of the site operate at acceptable levels of service (LOS) at both the A.M. and P.M. peak periods. Further, based on crash data it asserts that there are no significant safety deficiencies at the surrounding intersections. The study concludes that Alternative A's refined design would not result in significant impacts on roadway capacity and safety.

Thus, short-term moderate adverse impacts would result from construction activities that would likely constrict rights-of-way in the immediate area. The narrowing of C

Street, SW in each direction is anticipated to have negligible impacts to the levels of service at the affected intersections because of the low traffic volumes on C Street SW. Long-term beneficial impacts would result to traffic circulation on 3rd and 4th Streets SW due to the elimination of the surface parking lot ingress and egress points on these streets. In addition, the narrowing of C Street SW and the bulbouts are expected to have a traffic calming effect resulting in beneficial impacts to area traffic.

Mitigation Measures

- Coordination with District of Columbia Fire and Emergency Services should occur throughout the design process to ensure that emergency vehicle access is maintained to the site.
- To minimize impacts on area vehicular rights-of-way, construction traffic and equipment should be minimized during AM and PM peak hours, and construction schedules should be coordinated with nearby projects, including the American Veterans Disabled for Life Memorial, the proposed Eisenhower Memorial, and FOB 8 exterior improvements.
- DDOT has reviewed GSA's traffic study and proposed cross sections for C Street SW. GSA is coordinating with and will continue to coordinate with DDOT regarding the final design of C Street SW to ensure that a mutually acceptable design is completed.

Parking

The 2011 Draft Traffic Study also addresses impacts to parking resulting from the design. The study concludes that the proposed reduction of off-street parking within the local area is in general accordance with the City's and Federal policies regarding travel demand management, mobility and sustainability. Although the narrowing of C Street SW at the center of the block would result in the loss of eight metered parking spaces, given the volume of metered parking within the area, this would only result in a minor adverse impact. DDOT has indicated that they will not require any mitigation for the loss of these spaces.

There are currently five parking spaces within the Switzer Building surface lot that are dedicated to the Health and Human Services (HHS) Child Development Center (CDC) located within the Switzer Building. In addition, there are three spaces on D Street SW that allow for 15 minute parking during peak hours to accommodate CDC drop-off and pick-up. The proposed design would result in the loss of the five parking spaces within the surface lot. However, additional on-street spaces would be provided for CDC drop-off and pick-up. In addition to the three spaces already provided on D Street SW, the additional spaces may be located on C Street SW, 3rd Street SW, D Street SW or 4th Street SW, in as close proximity to the Child Care Center entrance or other Building entrances as possible. The loss of the off-street parking for CDC drop-off and pick-up would result in minor adverse impacts to CDC parking, as the off street parking spaces provide safer drop-off and pick-up than the on-street parking would provide. All of the on-street parking provided for CDC pick-up and drop off would be for 15-minute parking during peak hours, in off-peak the parking spaces would revert to metered parking.

Overall, short-term minor to moderate adverse impacts to metered parking would occur during construction. Long-term impacts to parking would be minor due to the small number of spaces being lost at the Switzer Building and the presence of nearby commercial parking lots.

Mitigation Measures

- In conjunction with the ongoing modernization project, GSA is conducting a pilot program for CDC drop-off and pick-up. As a part of the pilot program, various measures will be tested to determine the most efficient and safest way to provide for CDC drop-off and pick-up. Measures that GSA is proposing for the pilot program include, but are not limited to:
 - Appropriate signage for dedicated parking spaces
 - Pavement markings, cones and/or other physical barriers to clearly delineate the usage of the parking spaces
 - Increase staffing to monitor and enforce the drop-off and pick-up zones

Pilot measures will be coordinated with DDOT and the CDC, as appropriate. Based upon the pilot program and input from DDOT and the CDC, GSA will determine the final arrangements and parking space locations for CDC drop-off and pick-up. These final arrangements will be submitted to DDOT and CDC for review and approval.

Public Transportation

Short-term moderate impacts would result from construction related temporary disruptions to Metrobuses serving stops on the corner of C and 4th Streets. Long-term impacts would be negligible.

Mitigation Measures

- Minimize disruptions to public transportation by timing construction so that Metrobus service would only need to be re-routed for a minimal amount of time and so that nearby stops served by Metrobus lines would not be impacted.

Pedestrian/Bicycle Circulation

Short-term minor adverse impacts to pedestrians would result during construction and minor to moderate adverse impacts to pedestrian circulation resulting from the perimeter security. Long-term beneficial impacts to pedestrian circulation and experience would result from the installation of a public plaza, wider sidewalks on C Street SW, ADA compliant curb cuts, and additional street trees surrounding the site. No adverse impacts are anticipated to bicycle circulation.

Mitigation Measures

- The final design should comply with ADA accessibility requirements and facilitate circulation to and from the nearby Metrorail Station, the future American Veterans

Disabled for Life Memorial east of the site, and the future Eisenhower Memorial west of the site.

- During construction of the site improvements, the appropriate signage and flagging should be utilized to ensure pedestrian and bicyclist safety.

Energy Use and Sustainability

Long-term beneficial impacts would result from the installation of LID measures, the installation of the ground source heat pump that would serve the building, and the reduction of paved surfaces.

Utilities

Construction of security features, conversion of surface parking to landscaped plaza, narrowing of C Street SW, and the addition of more street trees could potentially disturb several utility lines and street lighting; resulting adverse impacts would be short-term and minor. In conjunction with the narrowing of C Street SW, storm sewer curb inlets on C Street SW would need to be relocated. Long-term beneficial impacts to the storm sewer system may occur with the increased capture of stormwater on-site.

Mitigation Measures

- Coordinate with DC WASA to determine if a preconstruction survey is necessary and for potential relocation of storm sewer inlets.
- Coordinate with PEPCO to ensure all electrical lines remain intact and are safe to work around.
- Any new or replacement street lighting should be provided in accordance with District standards.

Air Quality

Short-term minor adverse impacts to air quality may occur from fugitive dust during construction. Long-term impacts from emergency generator usage would be negligible because of its limited use and because it will be designed to meet applicable air quality standards.

Mitigation Measure

- Best management practices would be employed during construction to control fugitive dust.

Noise Levels

Short-term moderate adverse impacts may result during construction activities. Long-term impacts to noise would be negligible with potential beneficial impacts resulting from the relocation of the emergency generator to below-grade.

Mitigation Measures

- Appropriate best management practices would be employed to control noise at its source during construction.

- Appropriate best management practices will be designed to control noise for the emergency generator and to ensure that noise from operation of the generator will be controlled to meet District's noise standards.

V. SECTION 106 of the NATIONAL HISTORIC PRESERVATION ACT

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), federal agencies are required to consider the effects of any undertakings on districts, sites, buildings, structures, or objects included, or eligible for inclusion, in the National Register of Historic Places. Federal agencies are also required to afford the Advisory Council on Historic Preservation (ACHP) a "reasonable opportunity to comment with regard to such undertaking."

Through the coordinated NEPA and Section 106 processes, GSA has determined that the implementation of site improvements at the Mary E. Switzer Building has the potential to have an adverse effect, as defined by *36 CFR Part 800: Protection of Historic Properties*, on the historic resources within the Area of Potential Effect, including contributing features of the L'Enfant Plan, the Switzer Building and the Cohen Building. GSA has consulted with the SHPO and the ACHP pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f)) regarding the effects of the Undertaking to develop a Memorandum of Agreement (MOA) to document the agreed upon design program and mitigation measures. The MOA will be executed and signed by GSA and appropriate parties. GSA shall ensure that the measures outlined in the MOA are carried out to minimize, mitigate, and avoid adverse effects.