

1.0

PURPOSE AND NEED

1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

The Lafayette Building houses the Export-Import Bank, and a portion of the Department of Veterans Affairs. The structure is located on a tight urban block directly north of Lafayette Square and directly south of McPherson Square, within the Downtown DC Business Improvement District (BID). The block is bounded by Vermont Avenue to the west, I Street, NW to the north, 15th Street, NW to the east, and H Street, NW to the south. The Sofitel Hotel occupies a portion of the block at the corner of H and 15th Streets, NW.

The General Services Administration (GSA) proposes to install permanent perimeter security at the Lafayette Building in Washington, DC. Temporary perimeter security measures currently at the site consist of planters located only at the Vermont Avenue entrance of the building. Permanent security measures would be developed in accordance with the Interagency Security Committee (ISC) Security Design Criteria for New Federal Office Buildings and Major Modernization Projects. The ISC criteria require that security measures be based on a building-specific risk assessment resulting in a recommended level of protection and level of risk from a list of specific threats.

The National Capital Planning Commission (NCPC) is preparing this Environmental Assessment (EA) in cooperation with GSA to assist in decision-making by assessing the potential impacts of the proposed security improvements on the natural and man-made environment. This environmental documentation is consistent with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], the National Historic Preservation Act (NHPA) of 1966, as amended, and NCPC's *Environmental and Historic Preservation Policies and Procedures* (adopted April 1, 2004) as well as NCPC's *National Capital Urban Design and Security Plan Objectives and Policies* (adopted May 5, 2005).

This EA describes the affected environment, identifies potential environmental impacts of the three alternatives, including short-term construction-related impacts and long-term operational effects, and suggests possible mitigation measures associated with implementing the alternatives,. In addition, cumulative impacts, resulting from the implementation of the proposed action together with other current or planned projects, are considered.

For the purpose of identifying the potential environmental impacts associated with the proposed security improvements, a study area was defined to serve as a guide within which short-term, long-term, and cumulative impacts are analyzed. The study area is generally bounded by McPherson Square to the north, the buildings located on the east side of 15th Street, NW to the east, Lafayette Park and the buildings that line the south side of H Street to the south, and the Department of Veterans Affairs Building to the west. The area may expand or contract for each resource discipline, depending on the potential for impacts to a given geographic area.

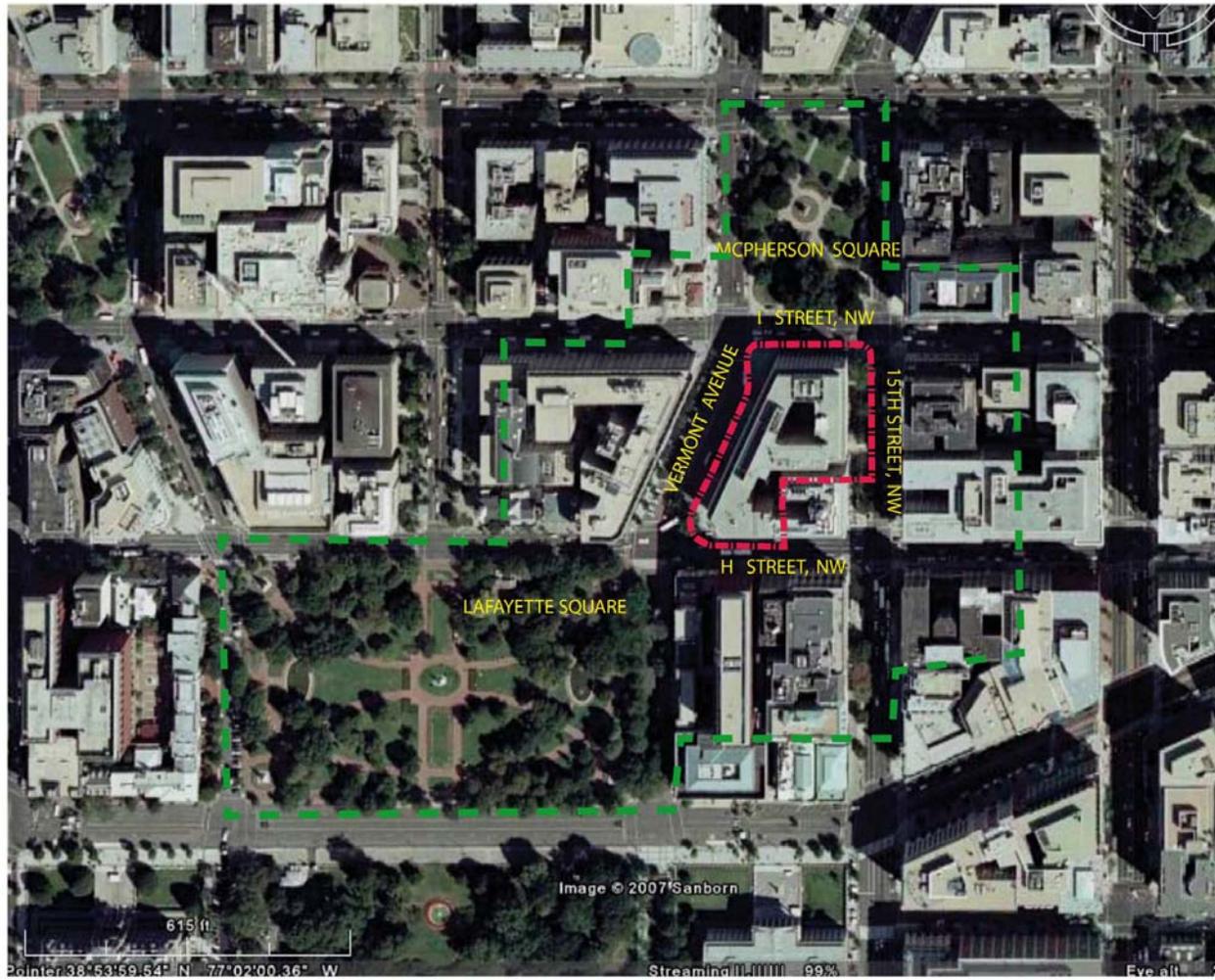


Figure 1-1
Lafayette Building
Project Site and Surrounding Area

1.2 Background

The Lafayette Building was designed in 1939 through a collaboration between Holabird and Root, a Chicago architectural firm, and A.R. Class of Washington, DC. It was constructed to serve as the headquarters of the Federal Loan Agency, including its component the Reconstruction Finance Corporation (RFC). The structure is a National Historic Landmark based on the role the Federal Loan Agency played in financing the mobilization of American industry in World War II, contributing significantly to the victory of the Allied forces. The Lafayette Building is also listed in the National Register of Historic Places as a contributing element in the 15th Street Financial Historic District.



Figure 1-2

Southwest Corner and West Elevation of Lafayette Building with Entrance at Vermont Avenue, NW

GSA proposes to provide enhanced security for the Lafayette Building in Washington, DC, through the installation of permanent perimeter security measures. Temporary perimeter security measures currently at the site consist of planters located only at the Vermont Avenue entrance of the building. Permanent security measures are developed in accordance with the Interagency Security Committee Security Design Criteria for New Federal Office Buildings and Major Modernization Projects approved by concurrence of the ISC membership on September 29, 2004. The ISC Security Design Criteria require that security measures be based on a building-specific risk assessment resulting in a recommended Level of Protection and level of risk from a list of specific threats. The risk assessment, developed through the use of GSA's Decision Support Tool, found that the Lafayette Building would be highly vulnerable to a vehicle-borne threat. The two action alternatives were designed to reduce vulnerability to that threat.

NCPC's *National Capital Urban Design and Security Plan Objectives and Policies* (adopted May 5, 2005) seek to balance federal agencies' security requirements with protection of the public realm. Under these Objectives and Policies, security elements should not impede the city's commerce and vitality, pedestrian or vehicular mobility, or operational use of streets and sidewalks within the downtown. As one of the first federal buildings in this area of downtown Washington for which perimeter security in the public streets and sidewalks surrounding the building is proposed, analysis of the installation of perimeter security elements for the Lafayette Building is extremely important. The project may be seen as a precedent for future perimeter security projects within the Downtown Area, an area dominated not by government buildings but by privately-owned commercial and mixed-use structures.

In addition to perimeter security improvements, GSA intends to renovate the building, including both interior features and exterior windows and stone, between 2009 and 2013. A Memorandum of Agreement (MOA) among GSA, the Advisory Council on Historic Preservation (ACHP), and the District of Columbia State Historic Preservation Office (DC SHPO) addressing these renovations was signed in February 2007. The renovations covered under the MOA are not the subject of this EA. The MOA states that perimeter security improvements, including those that will be undertaken concurrent with the building renovations, will require additional analysis and consultation. To assist NCPC in its review of the project, this EA and on-going Section 106 consultation address the proposed perimeter security improvements. GSA prepared a Categorical Exclusion (CatEx) to fulfill its requirements under NEPA.

1.3 Purpose and Need for the Proposed Action

The National Capital Planning Commission is the federal government's central planning agency for the District of Columbia and surrounding counties in Maryland and Virginia. The Commission is responsible for providing overall planning guidance for federal land and buildings in the National Capital Region, including both new construction and the renovation of existing facilities. As such, NCPC has approval authority for the Lafayette Building perimeter security project. The agency has undertaken this EA to assist its decision-making process.

1.4 Public Involvement and Agency Coordination

1.4.1 Public/Agency Coordination and Scoping

NCPC initiated the public scoping process on June 18, 2007 through a posting on the NCPC website announcing its intent to prepare an EA and inviting public comment on scoping. On June 19, 2007, NCPC e-mailed letters to regulatory and review agencies also soliciting comment on the proposed security improvements. The public comment period on scoping was open through July 9, 2007. All comments received during this period were considered in the development of this EA.

Public and agency coordination also occurred through the Section 106 process, as mandated by NHPA. The first consultation meeting between NCPC, GSA, the DC SHPO, and the DC Department of Transportation (DDOT) occurred on June 25, 2007. A second meeting was held on July 2, 2007, a third on July 10, 2007, and a fourth on July 23, 2007. Meetings will continue throughout the environmental and historic preservation review process, and a 30-day public and agency comment period has been incorporated into the project schedule.

1.4.2 Public/Agency Comments on the EA

Agencies and the public are encouraged to review and comment on the contents of this EA. The agencies, organizations, and individuals included on the notification list in Appendix 5.3 were notified by email of the availability of the EA for review and comment. The EA has been posted on NCPC's website and copies of the EA are available for public review at the following location:

National Capital Planning Commission
401 9th Street, NW
North Lobby, Suite 500
Washington, D.C.
(9:00 am to 4:00 pm Monday-Friday; call first at (202) 482-7200)

Comments on the EA must be submitted during the official 30-day comment period that began on August 17 and concludes on September 17, 2007. Comments should be mailed, emailed, or faxed to:

Lafayette Building Perimeter Security EA,
c/o EDAW, Inc.
601 Prince Street, Alexandria, VA 22314;
Lafayetteea@edaw.com; or
(703) 549-5869 (fax)

1.5 Environmental Issues Considered

This EA has been prepared to examine the potential impacts that the proposed security improvements would have on cultural resources (historical and visual resources), land use (use patterns and planning policies), vegetation (street trees), and transportation (vehicular circulation, parking, and pedestrian circulation), as well as the cumulative effects of perimeter security projects on public space (the public pedestrian right-of-way) in the downtown area of the District of Columbia. Through the scoping process, it was determined that historic and visual resources required a detailed analysis primarily due to the building's status as a National Historic Landmark, its inclusion in the 15th Street Financial Historic District, and the importance of the surrounding roadways and reservations to the L'Enfant Plan.

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

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

Socio-Economics: There would be no impact on businesses within the larger study area, as the improvements would not increase or decrease the resident or working populations. Localized potential impacts to retail establishments along the west side of 15th Street are discussed in more detail within the EA.

Demographics and Environmental Justice: The security improvements would not directly affect the resident population because of the project's location. Thus, there would be no impacts to demographics or environmental justice.

Archaeological Resources: Since construction would require only minimal excavation on the site, and since the area has already been disturbed during construction of the building, sidewalks, and roadways, no impacts to archaeological resources are anticipated.

Geology, Topography, and Soils: Since there would be no major soil cut, fill, grading, or subsurface construction (other than bollard installation), the proposed security improvements would have no impact on site geology and topography. Although surface soils would be displaced during construction of the proposed security elements, the activity would occur in previously disturbed soils and thus the potential soil impacts would be negligible.

Water Resources: There are no known wetlands or potential wetland areas located in proximity to the project site and the site is not located within the 100-year floodplain. In addition, there are no surface water bodies within the area surrounding the site. Since the proposed improvements would require only minimal excavation, there would be no impacts to groundwater.

Wildlife: Wildlife on the project site is limited to urban species of small tree-dwelling mammals and birds, such as grey squirrels, house sparrows, and pigeons. These species would be

temporarily dispersed during construction. However, urban wildlife would be expected to return to the site once construction is completed.

Air Quality: Construction of the security improvements would result in negligible impacts to air quality, due to the fact that the use of construction vehicles would be minimal. There would be no long-term impacts to air quality, as the security improvements would not affect the number or operation of vehicles in the region.

Noise: The proposed project would generate minimal construction-related noise for a short period of time. There would be no noise impacts once the construction is complete.

Solid and Hazardous Waste: The installation of perimeter security elements would not generate additional solid waste nor would it involve the use of hazardous materials. On-site soils disturbed by installation of the security elements are not anticipated to contain hazardous materials.