

# STAFF RECOMMENDATION

## REVISED

E. Keller

NCPC File No. 6669



**UNITED STATES INSTITUTE OF PEACE**  
NEW HEADQUARTERS AND PUBLIC EDUCATION CENTER  
23<sup>rd</sup> Street and Constitution Avenue, NW  
Washington, D.C.

Submitted by the United States Institute of Peace

October 26, 2006

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### **Abstract**

The United States Institute of Peace (USIP), acting through its Endowment, has submitted preliminary site and building plans for a new headquarters building at the corner of 23<sup>rd</sup> Street and Constitution Avenue, NW in Washington, D.C. The USIP preliminary design includes offices for program and administrative staff and research fellows, a research library and archives, a state-of-the-art conference center with classrooms and training rooms, and an interactive education center that is open to the public.

### **Commission Action Requested by Applicant**

Approval of preliminary site and building plans pursuant to 40 U.S.C. § 8722(b)(1) and (d).

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### **Executive Director's Recommendation**

The Commission:

- **Approves** the preliminary site and building plans for the United States Institute of Peace Headquarters and Public Education Center, as shown on NCPC Map File No. 1.33 (38.00)-42126.
- **States** that the Institute's new headquarters will be a significant building that nevertheless must defer to the Lincoln Memorial in its lighting treatment and luminance level, which will be determined onsite during construction in collaboration with the Executive Director, National Park Service, Commission of Fine Arts, and the District of Columbia State Historic Preservation Office in a process to be defined in a Section 106 Memorandum of Agreement.
- **Requires** the United States Institute of Peace, in the submission of its final project design, to accomplish the following:

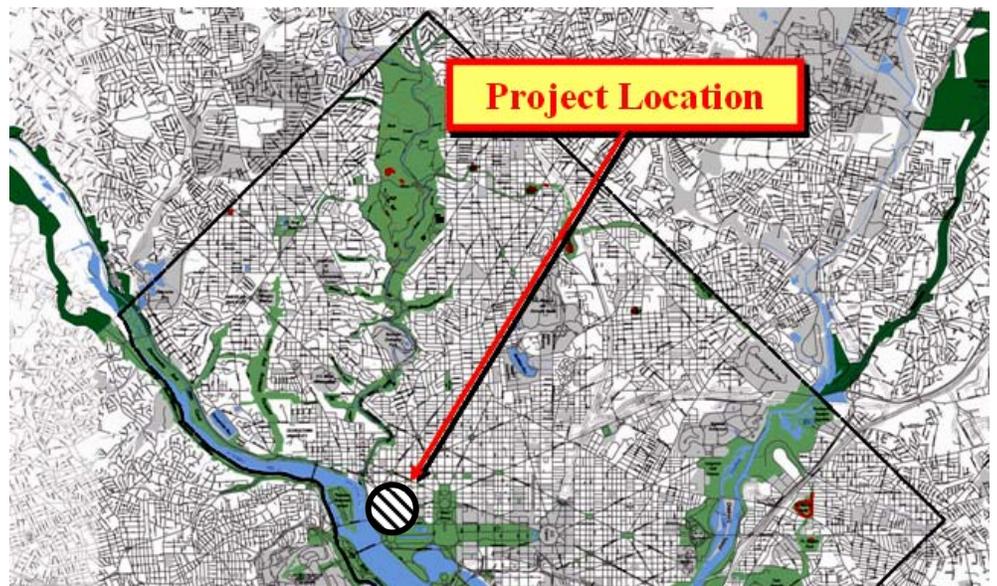
- Complete site grading plans indicating, with grading contours, all ground elevations within the site and adjacent to the new building.
- Complete building design and fenestration details of the parking attendant booth at the USIP parking garage drive, including all gate apparatus, flagpoles and equipment.
- Submit samples of all final project colors and materials for the building and site.
- A complete labeled and detailed site landscape planting plan. The plan shall include a planting design that establishes a vegetation buffer or screen at the west and southwest areas adjacent to the exterior building loading dock, as a component of the project Phase 1 construction. This planting must effectively screen this area with evergreen trees for all-season visual screening.
- A completed Transportation Management Plan addressing traffic management for conference and event traffic at the USIP at relevant times within an anticipated year-long USIP activities schedule. This analysis should evaluate both daytime and nighttime events and identify traffic management strategies that will be the full responsibility of the USIP. The Plan must indicate how traffic control signals are coordinated with the project vehicle entrance drive.
- A proposed schedule for onsite testing and review of project lighting luminance limits for the NCPC Executive Director during the construction period of the project, and a draft copy of the section of the building manual specifying the general format and content of the luminance limits for the project that will ultimately be provided to NCPC for record purposes.
- A fully completed and signed Memorandum of Agreement under Section 106 of the National Historic Preservation Act to be provided with the submission.

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**PROJECT DESCRIPTION**

Site

The submitted site and building plans involve the southeastern corner portion of the old Naval Observatory property at 23<sup>rd</sup> Street NW, now called the Potomac Annex. The site area is approximately 2.0 acres of sloping



**REGIONAL PROJECT LOCATION**

vehicle parking area that currently serves the Navy property along with the Department of State. The U.S. Institute of Peace (USIP) has been authorized by Congress to acquire the naval property as a direct transfer of the land from the Navy, once all required federal review approvals are obtained. The USIP is also required to provide the Navy a number of parking spaces equal to the number currently available to the Navy on the site.



**AERIAL VIEW OF PROJECT SITE LOCATION**

### Background

Public Law 104-201, Subtitle C Section 2831, dated September 23, 1996, authorizes the Department of the Navy to transfer land to USIP for the purpose of establishing a new headquarters building in Washington, DC. The USIP is an independent, nonpartisan, national institution established and funded by Congress.

At the Commission's June 2006 meeting, the Commission commented favorably on the concept site and building plans for the U.S. Institute of Peace Headquarters and Public Education Center, as shown on NCPC Map File No. 1.33 (38.00)-42034. Additionally, the Commission requested that the U.S. Institute of Peace, in its preliminary site and building plan submission, examine the following:

- The establishment of project site work limits and the extent and nature of the western garden site development and full project grading plan.
- The review and provision for a public space streetscape setback at its site adjacent to any future revised bridge ramp west of the Institute's planned location. A pedestrian and bikeway connection was to be clearly established and marked out at the west and south portions of the site.
- That added text information and visual depiction of the building's nighttime appearance and site lighting was to be submitted to indicate the intent and character of the project light enhancement pertaining to its potential effect to the visual environment.

The applicant has responded in the preliminary submission by providing a final metes and bounds survey of the land to be transferred; a revised site plan that establishes a pedestrian sidewalk and bikeway at the Institute's western boundary; an updated garden layout with initial elevations at the structure, and a detailed lighting analysis and proposed lighting design for the USIP building.

### Proposal

The submitted plans reflect changes that have been implemented or further refined in the continued design development of the project. Underground parking for approximately 220 vehicles remains part of the project, with only 80 spaces used by USIP, while 140 replacement spaces are dedicated to the Navy. A significant aspect to the building's site design is that the former interior service area and truck dock are now relocated to the north and northwest, on the building's exterior. The service drive, however, remains concealed behind the building and is below the site's retaining wall at the north boundary.

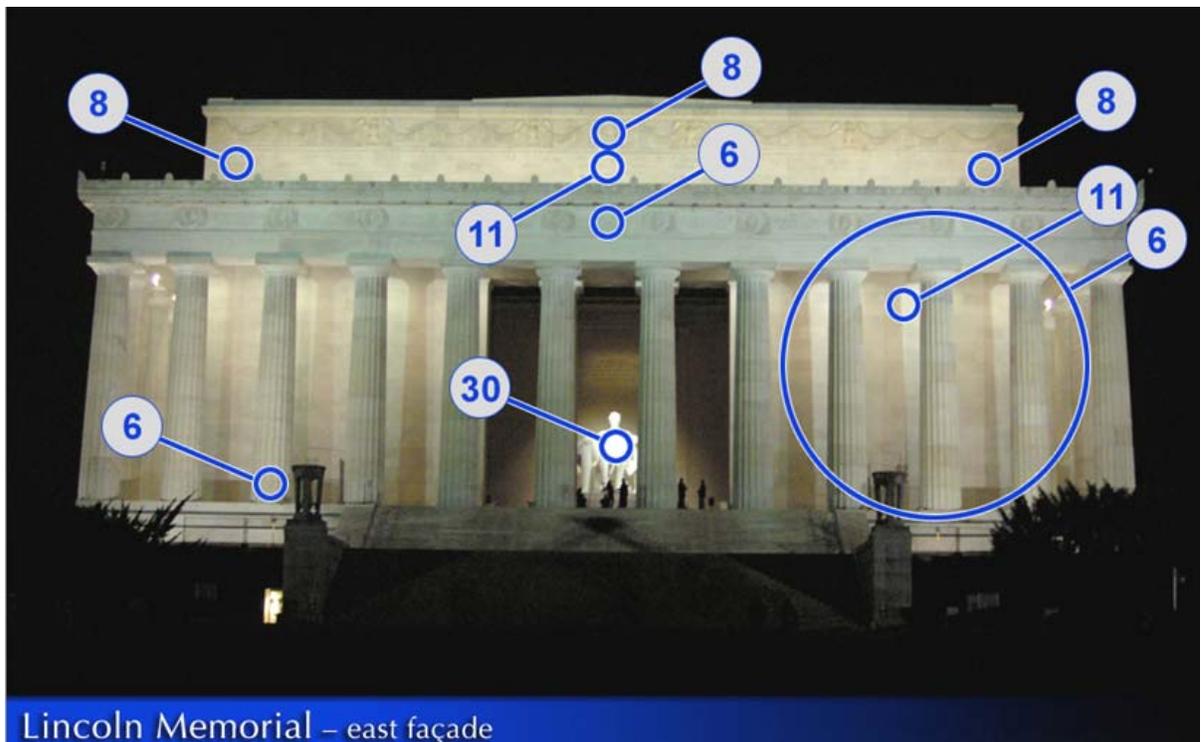
The six-level new structure parapet maintains an elevation 94'-0". The finished grade varies from elevation 26'-8" to 40'-4" around the perimeter of the building. The height from finish grade to the top of the parapet varies from 67'-4" to 53'-8". Total building height to its highest point is 118 feet. The flood stage elevation of the Potomac River is at 14 to 16 feet, at the flood zone abutting, but not within, the USIP location on Constitution Avenue. The building and site design would have no impact on floodplain characteristics.

The building, comprising a little more than 279,000 gross square feet of space (including garage), is clad in acid-etched precast concrete, with a limestone-like appearance, and contains building spaces that are roofed by a series of undulating spherical and toroidal segments constructed of a steel frame and white translucent glass. A battered panel base is featured on the building as it meets the ground. The translucent roof and sidewall insulated glass of the building has been an issue of concern to some members of the public. The USIP has carefully reviewed the transparency and lighting effects from the proposed design during preliminary design.

To quantify the brightness of the monuments in the vicinity and to analyze the planned lighting of the new USIP building, the applicant measured the luminance of nearby memorials, and other prominent buildings in late February 2006. Luminance is a measure of light intensity of a surface

in a given direction. The unit of measure is candela per square meter. A candela is roughly equal to the quantity of light given by the flame of a single candle in all directions. The Lincoln Memorial is the most significant monument for comparison of light effects because of its proximity and ability to be viewed simultaneously with the USIP building. The brightest areas of the Lincoln Memorial facades were measured at approximately 11 candela per square meter.

Illumination of the USIP headquarters will be limited to interior lighting that filters through a diffusing roof. The amount of light illuminating the underside of the roof will be variable after the building construction is complete and for the duration of the building's lifetime. The portion of the roof over interior space will be illuminated by linear fluorescent fixtures concealed at the top of the atria walls. These fixtures will have digital addressable dimming ballasts allowing the output of each fixture to be independently set relative to the others. The lighting control system will then allow this tuned lighting profile to be adjusted by continuous dimming.



### LUMINANCE STUDY OF LINCOLN MEMORIAL

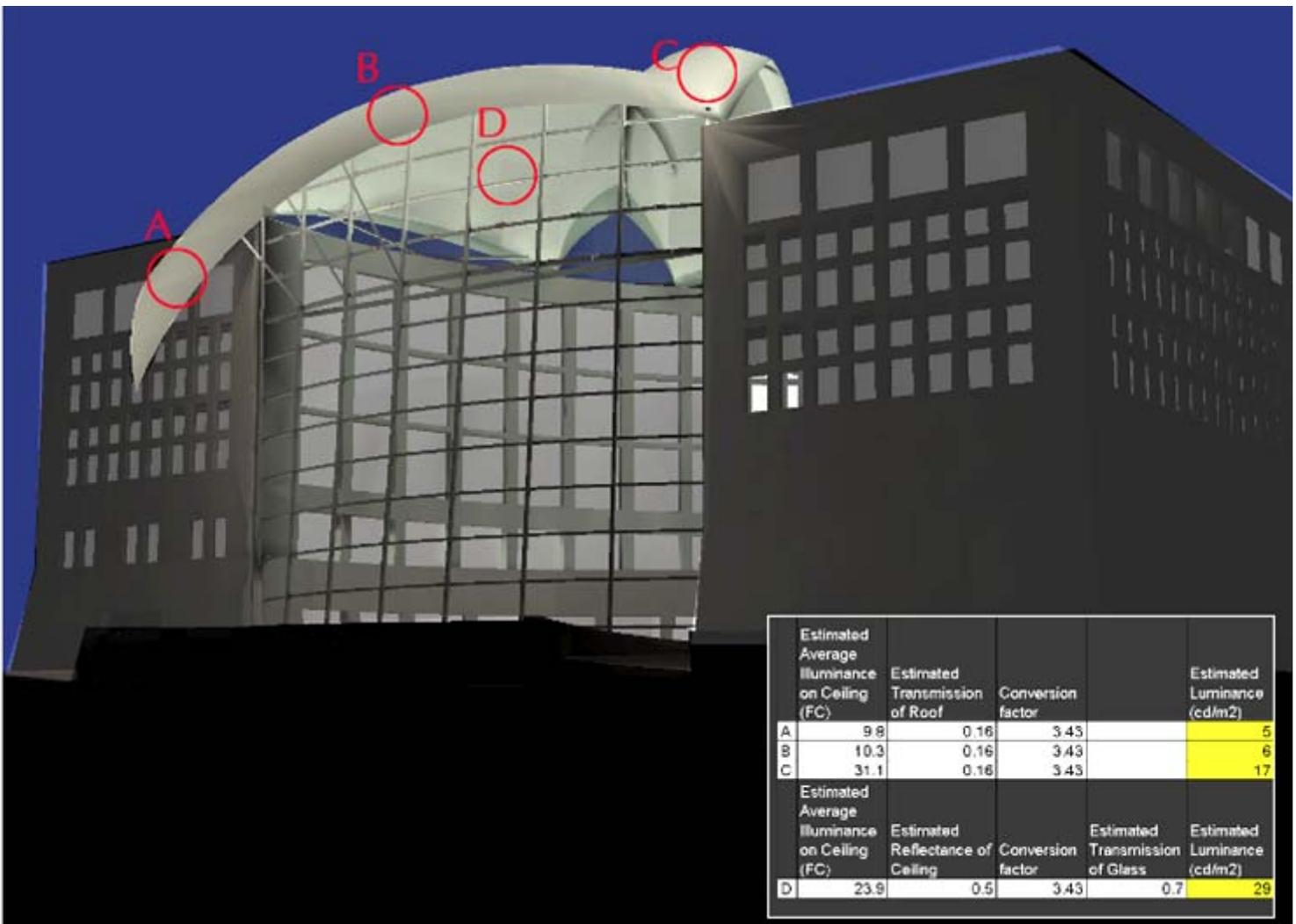
The portions of the roof that extend out over exterior space will be illuminated by narrow-beam metal halide fixtures mounted on the ground. This type of fixture cannot be electrically dimmed. If adjustment of the output of these fixtures is necessary, it will be achieved by switching off individual fixtures or by installing mechanical light reduction devices into the fixtures.

As initially submitted by the applicant, no part of the exterior surface of the visible roof is planned to exceed 11 candela per square meter as proposed. However, staff notes this lighting attribute is being reviewed by the District of Columbia State Historic Preservation Officer and the National Park Service, along with NCPC staff, and will be reduced to a lower level than that

of the Lincoln Memorial. All building areas will be adjusted and their controlled luminance will be measured with a luminance meter having a one (1) degree acceptance angle, such as the Minolta LS-100. The vantage points for measurement are to include:

- The southeast corner of Constitution Avenue and 23rd Street.
- From the Roosevelt Bridge (point to be defined).
- From the Memorial Bridge (point to be defined).
- From the George Washington Memorial Parkway (point to be defined).

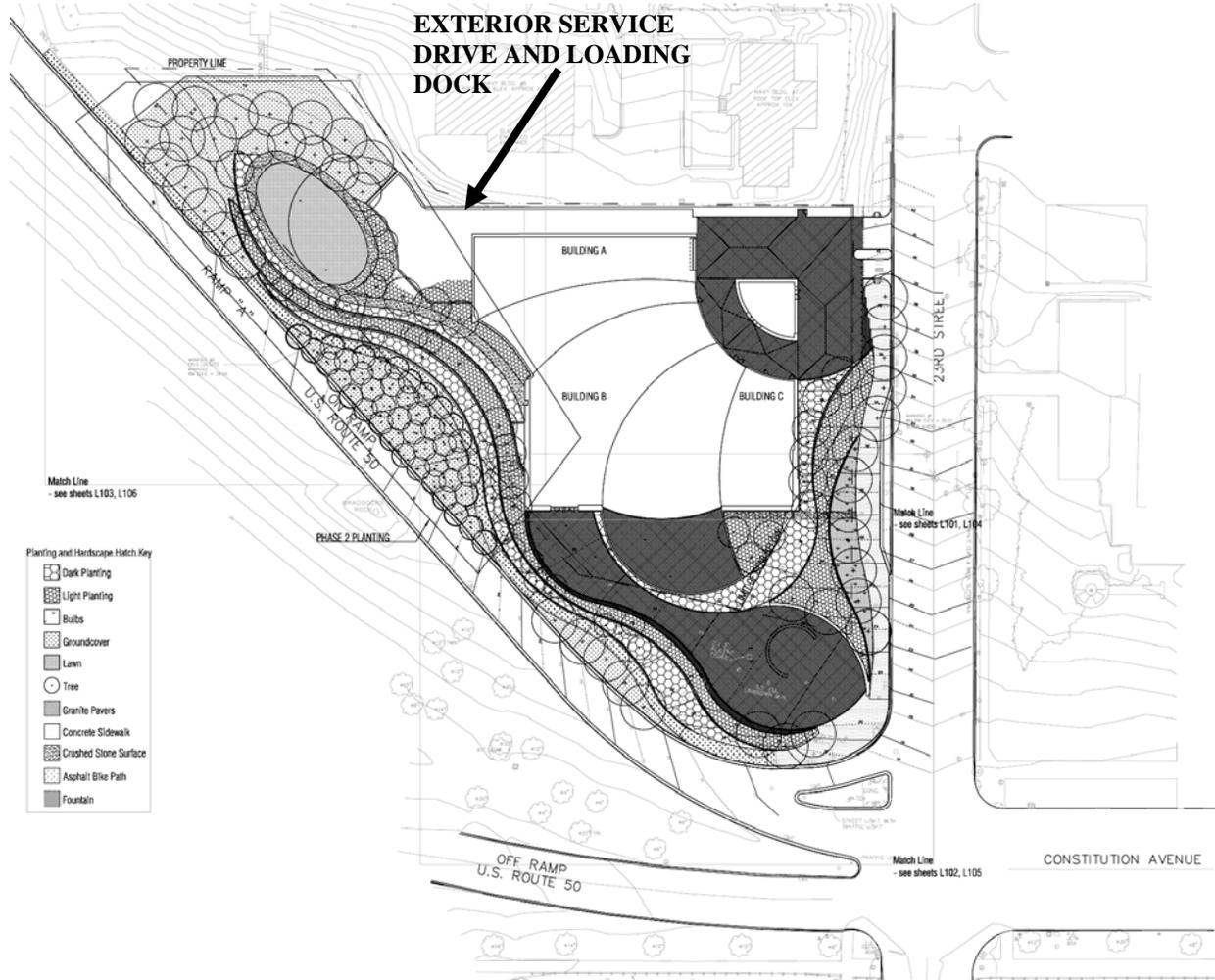
A written record of these measurements would be provided by USIP. Any settings of the lighting control system, or description of devices used to achieve these limits will be documented in writing and included in the operations and maintenance manual for the building to be provided to NCPC.



**INITIAL LUMINANCE STUDY OF USIP BUILDING BEFORE DIMMING SETTINGS**

In addition to the detailed review of lighting during preliminary design, the USIP further refined the design of the entry areas of the building and established that two sets of flagpoles are to be used in the site development. Additionally, a single row of fifteen bollards will be utilized at the port cochere to clearly establish, at the upper level, the pavement edge for motor vehicles using this turning area near the site entry stairway.

Finally, the preliminary site design firmly establishes the onsite vehicle entrance configuration with the revised service drive relocated to the north perimeter boundary. However, the parking attendant's booth is not well depicted regarding its basic design and fenestration and must be submitted with greater detail in the next submission. And while the preliminary proposal has provided revised information and detail on the building's entry and site grading adjacent to the structure's perimeter, additional documentation is lacking for the project's complete grading and landscaping plan.

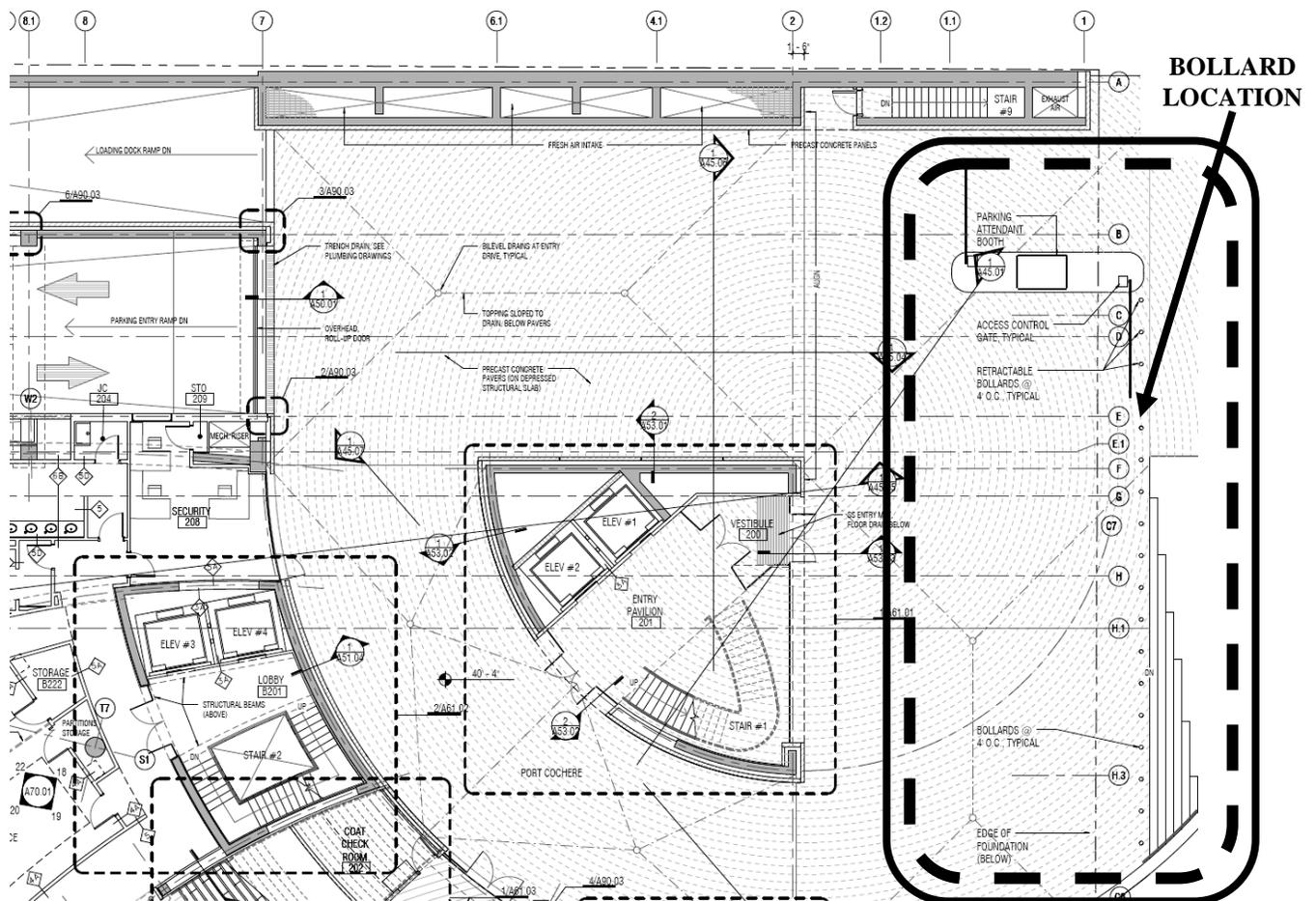


**PRELIMINARY DESIGN OF USIP GENERAL LANDSCAPE PLAN**

PROJECT ANALYSIS

Executive Summary

The staff recommends **approval of the preliminary site and building plans by the Commission, with conditions.** The design is intended to establish the headquarters as a symbolic structure along the streetscape. The use of the site at the corner of 23<sup>rd</sup> Street and Constitution Avenue anchors the corner area with a design that gives a defined presence and form to both the site and the public space area of the corner, and thus provides an added gateway presence to Constitution Avenue, NW. The building's form will be highlighted by controlled building light carefully balanced to not overwhelm the Constitution Avenue corridor nor adversely affect adjacent important memorials and important buildings of the vicinity. Staff has determined that while the objective of 11 candela per square meter luminance for the building's overall surface area is desirable as a measured goal, the actual visual appearance in the context of other environmental lighting inputs to the specific site may affect or alter that luminance limit as an overall visual composition. This luminance limit will be jointly established by the Executive Director in consultation and coordination with the Commission of Fine Arts, the National Park Service, and the District of Columbia Historic Preservation Officer. Once this reviewed luminance limit is observed and established, that limit will be the maximum allowable lighting to be provided to the USIP building and shall be documented in writing and included in the operations and maintenance manual for the building provided to the Commission.



**BOLLARD PLACEMENT DESIGN AT BUILDING PORT COCHERE**

Staff in the preliminary review also has determined the following specific areas of the building design must have additional details and construction level documentation when the applicant submits final project plans:

- Complete site grading plans indicating, with grading contours, for all ground elevations within the site and adjacent to the new building.
- Complete building design and fenestration details of the parking attendant booth at the USIP parking garage drive, including all gate apparatus and equipment.
- Complete and fully labeled and detailed site landscape planting plans. These plans shall include a planting design that establishes a vegetation buffer or screen at the west and southwest area adjacent to the exterior building loading dock area, as an initial component of the project construction. This planting must effectively screen this area with evergreen trees for an all-season result.
- A completed Transportation Management Plan to address traffic management of conferences and event traffic at the USIP at various times within an anticipated year-long event schedule. This analysis should evaluate both daytime and nighttime events and identify traffic management strategies that will be the full responsibility of the USIP.
- A proposed project lighting schedule for onsite review of the building luminance limits by the Executive Director during the construction period of the project.
- A draft copy of the building manual section that will ultimately be provided to NCPC for record purposes specifying the general format and content of the luminance limits for the project.
- A completed and fully signed National Historic Preservation Act, Section 106 Memorandum of Agreement to be provided with the submission.



**PRELIMINARY BUILDING DESIGN AS VIEWED FROM CONSTITUTION AVENUE AT 23<sup>RD</sup> STREET, NW (Perimeter Streetscape Trees Have Been Omitted)**

## Comprehensive Plan for the National Capital: Federal Elements

The missions of federal agencies are constantly changing as new laws, policies, and regulations are developed. To meet new agency mission requirements, office suites, meeting spaces, laboratories, and research centers need to be renovated or newly built.

In 1968, a policy adopted as part of the Federal Elements of the Comprehensive Plan stated that 60 percent of the region's federal employees should work in the District of Columbia and 40 percent should be located elsewhere in the region. This policy remains today. It should be considered in conjunction with the knowledge that federal activities provide opportunities for local jurisdictions to gain from taxes on the wages and salaries of federal employees, and generate property, sales, and income taxes from the private sector activities that often occur because of the federal presence. Therefore, federal workplaces that interact with each other, the private sector, and the public should be located in places that facilitate interactions. Federal workplaces with related activities will benefit from being located near each other, where interactions can occur more easily. For example, agency headquarters that work with the offices of the White House and Congress benefit from locations in the city of Washington. In conformance with those policy objectives, the project demonstrates adherence to the Comprehensive Plan objectives and goals of:

When locating federal workplaces within the Central Employment Area and the Capitol Complex\*, and surrounding areas\*\*, the federal government should:

1. Maintain the planned form and framework of the monumental core established through precedent and in the *Legacy Plan*.
2. Reserve the most prominent development sites, particularly those with important symbolic visual connections to the U.S. Capitol and other landmarks in the downtown area of the District of Columbia, for federal workplaces that contain the most important functions of the federal workforce.
4. Maintain and reinforce the preeminence of the monumental core by supporting the implementation of the other planning initiatives within the *Legacy Plan*, including transportation, infrastructure, and other development projects.

(Locating Federal Workplaces Policies, page 39)

In the context of the specific project design proposal, the following Comprehensive Plan policies apply:

### *Security*

Policy for the Design and Review of Physical Perimeter Security Improvements (adopted by the Commission on January 9, 2003)

1. Agencies requiring physical perimeter security improvements should design such improvements in accordance with guidance included in The National Capital Urban Design and Security Plan, as adopted by the Commission on October 3, 2002.

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\* The Central Employment Area and Capitol Complex are defined on pages 42 and 46 of the Comprehensive Plan.

\*\* In development areas identified by the local land use plans for this use.



### National Environmental Policy Act

In compliance with its Environmental and Historic Preservation Policies and Procedures, the National Capital Planning Commission (NCPC) and the Institute prepared an Environmental Assessment (EA) for the establishment of the Institute's proposed permanent headquarters facility. The EA was issued in June 2006 with a public comment period that closed at the end of that month.

The EA and comments from the public and other federal agencies on that document comprise the EA analysis information available to the Commission staff for review and compliance with the requirements of the National Environmental Policy Act (NEPA) and the Commission's implementing Environmental and Historic Preservation Policies and Procedures that apply toward the federal approval of the preliminary site and building plans. NCPC staff has independently reviewed the EA, and the impacts assessed therein, and confirm the analysis presented by the EA. The Executive Director issued a Finding of No Significant Impact on October 20, 2006.

The EA analyzes the proposed building design, its associated site development, and all associated construction and potential operational options at the location of the project as initially reviewed by NCPC in May 2006. The EA reviews the information and background of reasons other sites did not meet the purpose and need of the planned project. Additionally, NCPC has established that its evaluation in the EA has studied, developed, and described appropriate courses of action for the proposal that involve no unresolved conflicts concerning alternative uses of available resources. Alternative methods and levels of exterior lighting of the building have been considered in the EA process in the context of the document.

NCPC staff, in its independent review of the EA has found few potential environmental impacts. Those that exist are minimal and are addressed by mitigation through design modifications and through best management practices and design approaches in further implementing the final design and construction of the project. Visual impacts, especially to views protected as historic views and affects to historical and cultural components of the environment regarding exterior lighting and building lighting are being addressed by a National Historic Preservation Act, Section 106 Memorandum of Agreement that is being completed by the Institute. Additional issues during the EA public review are noted in the following discussion below and have been found to be of no significant effect. NCPC received only two public comments during the review period for the EA.

### EA Comment issues received by NCPC and further considered

#### *Comment 1*

From: Graham Davidson (gdavidson@hartmancox.com)

Date: June 8, 2006

Received Via Email

*Comment:*

I received the attached image of the proposed building, ostensibly taken from the EA, from the American Pharmacist Association (APhA). I believe that comparing the height of the Institute of Peace facade on Constitution to the facade of the new APhA addition is not valid and is misleading.

The two facades are not close to being in the same plane. The comparison should be made to the original Pope building. Also, I believe IoP (or their architect) had agreed to provide an elevation of the proposed building in the context of the rest of Constitution Avenue; presumably that has been included in the EA and would illustrate my point.

*NCPC Response:* The elevation comparison study was done as part of the NHPA Section 106 consultation and issues of concern regarding the viewshed effects of the project are defined and are being resolved by the Memorandum of Agreement pursuant to the NHPA, Section 106 process.

*Comment 2*

From: Glenn DeMarr, National Park Service, National Capital Region

Date: June 26, 2006

Received Via Email

*Comments:*

We have completed the review of the environmental assessment for the establishment of the Institute's proposed permanent headquarters facility at the Institutes preferred location.

1. The environmental assessment introduces, in short order, the basis for the consideration of the preferred site and the stipulation that the transfer cannot be made unless the Institute agrees to provide the Navy a number of parking spaces at or in the vicinity of the headquarters equal to the number of parking spaces now available on the proposed headquarters parcel. Please refer to P.L. 104-201, Part II – Navy Conveyances, Sec. 2831. The number of spaces allocated on the property by the Navy is approximately 110 spaces, although there are an additional 130 spaces that are used by the State Department. An *important point* is that the Navy Annex is advertised by DOD as surplus, see May 11, 2006 Notice of Availability.

*NCPC Response:* The Navy's Potomac Annex was inadvertently announced as excess property in a Notice of Availability of real property on the GSA web site November 15, 2005. After the mistake was recognized, the announcement was withdrawn on November 22, 2005. The site is not considered surplus property by the Navy and the May 2006 listing does not include or identify the Navy's Potomac Annex or any other naval properties in the Washington, DC area as excess property.

2. With the excessing, is there a continuing requirement to provide enclosed 110 parking spaces for three residential units that are being retained? That being said, the document reports that there are 2 levels of parking beneath the building (see 4-22). Does the document mention the

number of parking spaces? With the removal of 110 spaces from the floor plate, would the design be able to be reduced in height by approximately 8 feet?

*NCPC Response:* The Navy's Potomac Annex is not considered surplus and not subject to excessing. See Response 1. The agreed upon minimum of 110 spaces will be provided to the Navy as planned. The two levels of parking are needed to accommodate the necessary amount of parking spaces, identified as 230 spaces on page 4-28 of the EA. (That number is now reduced to 220)

3. A statement at 4-22 provides that the building is 5 stories above grade. Can the statement be clarified to indicate from final grade, from the grade of Constitution Avenue, or some define point so that the building height can be compared to those of the classical buildings that frame West Potomac Park in accord with the plan of the Public Building Commission (May 25, 1925 Public Law). Taking this further, the height of the building needs to be identified and put into perspective of height of the buildings that were designed and built along Constitution Avenue between 23rd Street and Virginia Avenue, NW. Is each floor 8 foot tall, or are the heights varied? What is the height of the partial dome, and does this apparently, acceptably, fall into some unoccupied variance?

*NCPC Response:* The parapet of the building is at elevation 94'-0". The finished grade varies from elevation 26'-8" to 40'-4" around the perimeter of the building. Therefore the height from finish grade to the top of the parapet varies from 67'-4" to 53'-8". The clerestory and glass roof will project above the parapet a maximum of 24'-0". This information is consistent with previous height definitions. Floor height varies by building level: Parking Level 2 at Elevation 7'2", Parking Level 1 at Elevation 16'4", Building Level 1 at Elevation 26'8", Building Level 2 at Elevation 40'4", Building Level 3 at Elevation 54'0", Building Level 4 at Elevation 66'0", Building Level 5 at Elevation 78'0".

4. An analysis of the buildings along Constitution Avenue evidences a formula of design that is similar to each, but yet each building is different. Please refer to Figure 4-2. Here the building to the east of the Institute is part of the avenue, but oriented slightly above the avenue, with a raised terrace supported by a vertical wall element, then having traversed a garden space, there is another raising of the grade to access the ceremonial entrance. It appears that the Institute is lowered into the grade, and having removed the grade change spaces it has gained in apparent mass, a height of about 10-12 feet. This design decision provides a presentation of 5 above ground stories, where the historic design pallet has resulted in a presentation of on 3 stories of height.

*NCPC Response:* Please see Response 3 for a detailed description of floor heights. Final design of the building will be addressed through the CFA and NCPC approval process.

5. What other sites were considered by the Institute before the preferred site was selected, and what were the criteria that used to establish the preference of one site over another, or to reject a site in deference to another. It is admirable that the Navy Annex site was provided for consideration, selection, and design.

*NCPC Response:* As stated in the EA, the site selection process was guided by legislative authority through an Act of Congress in 1996. Congress authorized the transfer of land from the Navy to the Institute for its permanent headquarters.

6. On 4-7, the document reports that the building would be consistent in elevation, massing and materials. How is that 5 stories is in the same category of mass as 3 stories. How is acid washed concrete in the same material category as the stone that was used in each of the building from 1926 through 1954?

*NCPC Response:* The proposed headquarters is compared to nearby buildings, including those at the Navy's Potomac Annex, those along Constitution Avenue, and those within the Northwest Rectangle. The buildings in this area vary by their design, height, materials, and massing. The American Pharmacists Association building, across 23<sup>rd</sup> Street from the proposed headquarters site, would be the closest building to the proposed headquarters along with the two nearby brick Navy Potomac Annex buildings north of the Institute's proposed site. Final site and building plans for an addition to the historic American Pharmacists Association building have been approved by the Commission and include a six story addition to the original building. The addition would result in the American Pharmacists Association building standing slightly taller than the proposed Institute headquarters. The materials of the Institute's building were not discussed in the EA, but NCPC concept review did review it. No significant objection by the Commission at that time was expressed regarding exterior finishes. Final design, including materials final selection, will be included as part of the NCPC and CFA approvals for the headquarters building.

7. On page 4-7 it is mentioned that a Section 106 initiation letter was sent on December 14, 2005. This letter and its determination of effect do not appear in the Appendices.

*NCPC Response:* The initiation letter was sent by the Institute to the State Historic Preservation Officer on December 14, 2005. The letter provides background on the Institute and the proposed headquarters, identifies historic properties in the area and requests formal review of the project by the DC SHPO. The Section 106 consultation remained ongoing when the EA was issued, and a final determination of affect from the DC SHPO had not been established at the release of the EA. Subsequent Section 106 consultation has been ongoing and a draft Memorandum of Agreement has been completed by the Institute, dated October 4, 2006. Although the initiation letter is not included as part of the EA issues that comprise the subject matter of the letter are identified. A copy of the letter is available by request as part of the public record for this project.

8. What are the project hours of operation of the Institute and the schedule for public access? It would appear that the plaza space could be conducive to special events, and there is a concern that such a potential would have a negative impact on the dignity of the designed spaces that now line Constitution Avenue from Virginia Avenue to 23<sup>rd</sup> Street, NW.

*NCPC Response:* The Institute's hours of operation will be from 8:30 am to 5:30 pm. The Public Education Center hours of operation will be from 10:00 am to 5:30 pm during off-peaks months and from 10:00 am to 7:30 pm during peak (summer) months. The outdoor plaza is not intended for special events; rather it is the point of entry and gathering for visitors to the Institute.

9. Page 3-21 of the EA, does not provide a number for the spaces that are to be provided in the Institute structure, it simply provides that there are now 241 parking spaces.

*NCPC Response:* Chapter 3, Affected Environment, documents the existing conditions of the site and study area. As a result, page 3-21 does not provide the number of planned parking spaces because it is not part of the existing conditions of the site. The number of spaces to be provided at the proposed Institute headquarters is presented in Chapter 4, Environmental Consequences. Page 4-28 identifies the planned 230 spaces as part of the project. (That number is now reduced to 220).

10. In the development of the design, what were the established limitations with respect to height, lighting, design, and general presentation onto Constitution Avenue and the long held role of each of the building sites to framing the avenue, and more importantly to frame Potomac Park, and in a greater sense preserve the dignity and setting of the Lincoln Memorial?

*NCPC Response:* The overall design intent was to create a building that meets the Institute's needs, but also is deferential to the monuments on the Mall, in particular the Lincoln Memorial. The elevation of the proposed headquarters building would be lower than that of the Lincoln Memorial and the night lighting would be softer than that of the Lincoln Memorial. In addition, the proposed headquarters would respect the Constitution Avenue building line, as established by the buildings of the Northwest Rectangle.

11. The Department of the Navy Notice of Availability reports that the Peace Institute site is comprised of approximately 3 acres, the EA provides that the site is approximately 2 acres in size. Is there a metes and bounds description of the site? Is it bordered by Constitution Avenue at any spot, or is it bounded on the south by the freeway ramp to Interstate 66?

*NCPC Response:* The withdrawn Navy Notice of Availability is inaccurate in its description of the site. The certified site survey provided by Greenhorne and O'Mara stamped and signed on February 7, 2006 defines the area of the site as 85,810 square feet or 1.9699 areas. The site is bounded on the south by the on ramps to Interstate 66.

12. The site was provided for consideration and use by the Institute of Peace, if the appropriate approvals were achieved.

*NCPC Response:* The Institute is in the process of obtaining necessary agency approvals, including those from the National Capital Planning Commission and the Commission of Fine Arts.

13. The Institute occupies how many square feet of leased space and has a program for the proposed building for how many square feet of space?

*NCPC Response:* The Institute currently occupies leased space in two locations: approximately 32,900 square feet, on four separate floors, at 1200 17<sup>th</sup> Street, NW; and approximately 5,600 square feet, on two separate floors, at 1730 M Street, NW. In addition to its leased space, the Institute rents out meeting space for conferences and trainings as well as storage space at a separate location. The planned headquarters will be approximately 279,000 square feet, including the parking areas.

14. With regard to the security needs of the Institute, at the preferred site, it is presumed that the proposed design fulfills the security requirements, and that no further security measures will be needed to implement a security plan that might impact adjacent properties.

*NCPC Response:* A security assessment was performed for the proposed building. It was determined that the proposed headquarters would be in a low threat level category and security needs could be met through the design of the site's topography and minor design features at the buildings north entrance. It is not anticipated that additional security measures would be needed as a result of the proposed headquarters location relative to adjacent properties.

15. The assessment implies that there is a lack of visibility of the Institutes presence to facilitate greater public awareness. So is the building, by its lighting, design and size intended to facilitate public awareness, and is it appropriate to accomplish this in the nearness of the building to the Lincoln Memorial and its historic presence on the city skyline of the City of Washington? Other buildings, along the avenue are of comparable importance, yet accomplish their roles in more succinct, classical manner.

*NCPC Response:* The proposed Institute headquarters is intended to facilitate greater public awareness of the Institute's presence relative to its current facilities and location, as well as by the design and location at an entry point into the District. The Institute's current headquarters space is inadequate in serving the needs of the program and in facilitating public awareness of the Institute's work and mission. Although the site would provide for increased visibility of the headquarters, the lighting, and size of the building are being carefully designed so as not to compete with the Lincoln Memorial. Specific lighting and elevation comparison studies were performed to ensure the proposed Institute would not compete visually with the Lincoln Memorial. The lighting levels are being designed to be lower than that at the Lincoln Memorial and are a focus of Section 106 consultation process. In addition, the lighting of the building will be completely controllable and can be dialed down or completely turned off to mute the lighting levels. The elevation comparison provided on page 4-10 of the EA illustrates that the proposed Institute headquarters would be lower in height than the Lincoln Memorial. The design of the proposed Institute headquarters is being developed to ensure that the Lincoln Memorial would remain the focus of the western end of the National Mall.

16. With the excessing of the Navy Annex, one of the criteria is that the Navy property successor provides a statement on how the property owner would provide greater long-term economic benefit. Given that this property, Appropriation Number 4, in the federal development of city, is a holding since 1791; it is probable that the Institute will have significant neighbors, with combined impacts on the area. It appears that these effects are considered negligible. In a planning sense, what are the potentials for the 12 acres of land?

*NCPC Response:* The Navy's Potomac Annex is not considered surplus and not subject to excessing. The remaining Potomac Annex land is being considered for various other tenet organizations that may use portions of the property, under the jurisdiction by the Navy, or by other arrangements as determined by the Navy and the U.S. Congress.

17. In a transportation sense, the site has limited capacity now, and any further development would impact traffic movement in a diverse number of directions.

*NCPC Response:* No further development is planned as part of this project. The Navy's Potomac Annex is not subject to redevelopment of this area unless decided upon by the Navy. Cumulative impacts of currently known additional projects, or proposed to date, are addressed in the EA.

18. The cumulative effects section makes no mention of the Navy Annex property excessing process.

*NCPC Response:* The Navy's Potomac Annex is not considered surplus and not subject to excessing. Please see Response 1.

19. Where is the National Academy of Sciences museum being constructed? It would seem a basic detail to illustrate the effects of this project on the neighborhood. Is the museum inside, on the grounds, near Constitution Avenue?

*NCPC Response:* The museum was originally proposed for a site near the proposed headquarters site; however, the plans for the museum were revised for a larger museum and the site was moved to be included as part of the Marian Koshland Science Museum, located at 6<sup>th</sup> and E Streets, NW. This response intends to serve as a correction to the outdated information included in the EA.

20. The design concept section under alternatives considered reports that the site is near the National Mall, rather than adjacent to it. The analysis here does not appear to address the designs of this space as envisioned in the McMillan plan, or the L'Enfant Plan. Instead, the federal property is described as a new urban gateway to the District, a pronouncement that has lost the high discussion and Presidential concern for this area in the development of the Theodore Roosevelt Island Memorial Bridge for the preservation of the Lincoln Memorial. Then the concern was the introduction of roads, traffic and signs, the actual alignment of the structure for its impact on the Lincoln Memorial.

*NCPC Response:* The proposed Institute headquarters is being designed at the location where the Theodore Roosevelt Bridge approaches the District's larger land mass at the Potomac River east shore. However, the proposed headquarters building would not compete with views of the Lincoln Memorial when entering the District from Virginia. Clearly the open vista and larger scale of the Lincoln Memorial prevails along the eastern approach across the bridge. When traveling east on the Theodore Roosevelt Bridge, the Institute building would be visible in the foreground briefly, before the Lincoln Memorial comes into filtered view as the bridge off-ramp descends down to the level of Constitution Avenue and the intersection of 23<sup>rd</sup> Street. Once the Lincoln Memorial is visible, the memorial becomes the dominant feature in the view through selected breaks in the streetscape at 23<sup>rd</sup> Street.

21. The design concept provides that the institute building is to be a symbolic structure representing peace on the Capital's skyline. Had this been the intent, the Federal Reserve building, the Pharmaceutical Building and the Health Building – each bordering Potomac Park could have utilized the stage to alter the skyline – but instead each is sedately subservient to the National Mall and the Lincoln Memorial.

*NCPC Response:* It is the intent of the proposed Institute headquarters to become a symbolic structure at a gateway location where the Theodore Roosevelt Bridge crosses the Potomac River.

The EA does not address the intent of the design of the existing buildings in this area. The existing buildings along Constitution Avenue are oriented toward Constitution Avenue to frame West Potomac Park and the Lincoln Memorial. Each prior building had its designed approved through appropriate review authorities and the ramifications of each separate design were considered at that time.

22. The “causeway” from Constitution Avenue has none of the culture of the formal entries of any one of the buildings and their designed garden spaces that frame Potomac Park. The causeway introduces a pedestrian entry way onto an unfortunate ramp to the Interstate system.

*NCPC Response:* The shape of the site and the bordering on-ramps limit the possibilities of providing a designed garden space in front of the building. The “causeway” is intended to serve as a part of the formal public entry procession to the Institute. Although the concept of the entry way is included in the EA, the site and building plans have not been finalized. A formal entry that mimics those of the existing buildings along Constitution Avenue is not possible as a result of the bordering roadways, including Constitution Avenue and the ramps to the bridge going west. Instead, the entry design will provide for sound buffering and elements that would allow for separation of the site from its neighboring roadways, as requested by reviewing authorities that will ultimately approve or disapprove the final project design.

23. It would be preferred that a graphic be provided that could relate the designed spaces of Constitution Avenue east of the site to the proposed site plan. To the east, the designed space has provided a double row of elm spaces between which is located a wide public walk. The proposed design does not extend this character west of 23<sup>rd</sup> Street.

*NCPC Response:* Although design concept graphics are included in the EA, the landscape and building plans have not been finalized. The design information was included to provide context for the EA.

24. Along 23<sup>rd</sup> Street, there is a formal planting of street trees that defines the 23<sup>rd</sup> vista between the Lincoln Memorial and Washington Circle by Henry Bacon, and the McMillan Commission, and the Public Building Commission. The plan as shown does not replace the planting along 23<sup>rd</sup> Street.

*NCPC Response:* Although design concept graphics are included in the EA, the landscape and building plans have not been finalized. The plan provided is included for the purpose of providing context for the EA and is not intended to provide final design details. More detailed plans, not included in the EA, would reveal that the street trees along 23<sup>rd</sup> Street assist defining the 23<sup>rd</sup> Street vista. Detailed plans will be included as part of the submission materials for further design approvals by NCPC and CFA.

25. Alternative B – No Action Alternative does not reflect the fact that this historic property, Appropriation 4, set aside in 1791, is scheduled for expropriation, and the likelihood that it would remain as surface parking is very unlikely. Congress did not mandate that the site be used, rather its transfer was conditioned upon receiving the appropriate approvals, a hint that concern existed for the appropriate development of the site.

*NCPC Response:* The Navy's Potomac Annex is not considered surplus and not subject to excessing. Please see Response 1. The appropriate approvals for the project are being sought by the Institute.

26. The absence of other alternatives based upon the offering of the site, subject to approvals, presents the prospect of deficiency and predisposed site selection.

*NCPC Response:* See Response # 5.

27. The site is now located at an entry point that was hotly disputed for its effect on the Lincoln Memorial, that it is now viewed as a key entry point to the District fails to recognize the controversy and concern of the past.

*NCPC Response:* Please see Response # 15.

28. The 1910 Height of Building Act has been utilized throughout the city, except in the neighborhood of the proposed site. The document sets forth the formula but does not establish the result of this project, were the measurements taken from 23<sup>rd</sup> Street or Constitution Avenue. Additionally, the heights of the buildings that have been constructed west of 17<sup>th</sup> Street through the efforts of the Public Buildings Commission are not compared to height and mass that are presented by the proposed building.

*NCPC Response:* Please see Response #3.

29. The Shipstead–Luce Act provides that “ development should proceed along the lines of good order, good taste, and due regard to the public interests involved, and a reasonable degree of control should be exercised over the architecture of private or semi-public buildings ... adjacent to grounds of major importance.” The Commission is to report “a means to prevent reasonably avoidable impairment of the public values.” What did the Commission report and how has the site and building design efforts respond?

*NCPC Response:* The concept design of the proposed Institute headquarters was approved in November 2005 by the Commission of Fine Arts. At this review, the CFA requested careful consideration be given to ensure that the Institute's proposed translucent roof does not compete with the grandeur of the Lincoln Memorial at night. Specifically, the CFA approval letter stated “...The members were pleased with architect Moshe Safdie's proposal and thought the design would produce a bold and dynamic building. As the design continues to develop, the members suggested that extra care and study be given to the configuration of the public entry plaza and garden at the southern part of the site, due to the need to buffer these areas from the busy intersection of 23rd Street and Constitution Avenue and the adjacent vehicular ramp leading to the Theodore Roosevelt Memorial Bridge.

The members also expressed concern about the amount of light that would emanate at night from the building's extensive glazing and its translucent roof. They recommended that light levels within and around the structure be carefully analyzed. The building's illumination should be controlled so that it produces a soft and subtle glow that will not outshine the nearby monuments on the National Mall, particularly the Lincoln Memorial.”

30. The Site History provides to analysis of the property as being established with the L'Enfant Plan in 1791 as Appropriation Number 4, and what it was to be used for within the historic development of the Federal City. There is no reflection that the site is topographically at the west end of the original land mass that was surveyed and set aside for development, nor that the Key of All Keys, central to the layout of the city is located in proximity to the site, nor does it reflect that Potomac Park was created forward of the property. Within the original plan of the City of Washington, it is not mentioned that the site was the terminus point of New York Avenue.

Additionally, there is no discussion of the impact of a building here as it relates to the formal planning efforts of the McMillan Commission, and subsequently the Lincoln Memorial Commission and the Public Building Commission.

*NCPC Response:* It is acknowledged that the site is located at the west end of the area originally planned by L'Enfant and that the site was the terminus point of New York Avenue.

The McMillan Commission envisioned the entire appropriation as a rectangular landscaped parcel containing the Naval Observatory in its northeast corner. Park Service photo documentation demonstrates the geometric south boundary of the parcel area early in the twentieth century, which was lost with the construction of the Theodore Roosevelt Bridge. During the ensuing years, the site was further developed by the Navy, with the most recent use of the project site being surface parking. While a building in this location was not specifically called for by the McMillan Plan, the proposed Institute headquarters would respect the Constitution Avenue building line established within the Northwest Rectangle. In addition, to the extent practicable within the constraints of the site, it would maintain a green buffer along the southern and eastern edges of the site.

31. Tiber Creek terminated with the tidal waters of the Potomac River in the vicinity of 15<sup>th</sup> Street, NW and what has become Constitution Avenue, NW. It must be noted that this site has been in the federal inventory since 1791, the document fails to provide a history of the site, except that it has been developed in the past. One suggested product of this undertaking, as mitigation is for the proponent to prepare and publish an accounting of the sites history, and the exact location of the Key of All Keys, and provide an interpretive presentation that portrays its importance to the plan of the City of Washington.

*NCPC Response:* The history of the site is discussed in Chapter 3: Affected Environment within the Cultural Resources section of the report (refer to page 3-8). The Key of All Keys, or Braddock's Rock, is located across from the site and adjacent to the on-ramps to the bridge, within a deep depth manhole established with the bridge construction. An interpretive presentation of the Key of All Keys at the proposed headquarters could encourage visitors to visit the Key of All Keys, which would require pedestrians to cross busy roadways to access the site. Therefore, an interpretive display of this features would not be appropriate as part of this project. Potential mitigation measures are being discussed during the NHPA, Section 106, consultation process.

32. The discussion of the L'Enfant and McMillan plans on page 3-9 reports does not develop the attributes of the plan or its importance in the area of the proposed building.

*NCPC Response:* The EA states that the National Register nomination identifies historic streets, reservations and appropriations, and historic vistas. It also states that Constitution Avenue, to the south, is recognized as a Major Street in the plan, that the vista along the avenue to the Capitol is a contributing vista, and that Twenty-Third Street is considered to be a contributing element.

33. The document does not include text that reflects the long term program of the Public Buildings Commission to establish buildings of similar design vernacular to frame Potomac Park, and that these plans, providing a set back building within a garden approach were submitted to the Commission of Fine Arts for review and approval. Significantly, it should be noted that the exception to the setback from Constitution Avenue, was contrary to the plans of the Commission and the President of the United States, Franklin D. Roosevelt, and a product of the Commission of Fine Arts.

*NCPC Response:* Although the proposed Institute headquarters would not be classical in style, it would respect the setback line established within the Northwest Rectangle. In addition, its materials and overall massing would be visually consistent with varied structures in the area.

34. The section on Page 4-8 does not clearly indicate that the building mass, which is comparable to the new building to be constructed behind the John Russell Pope design – the American Pharmacists Association building – is set on line with the low scale, understated, 4 story structures that frame Potomac Park. In effect, the high, raised mass is pushed nearly 150 feet east of the line that has been designed, and honored since the establishment of the National Academy of Science building.

*NCPC Response:* The proposed Institute building would be consistent in height with the approved addition to the American Pharmacists Association Building. It would also respect the setback line established by the buildings of the Northwest Rectangle on Constitution Avenue, NW. Moreover, visual analysis, as suggested by the Park Service, has been demonstrated in the EA indicating the significant buffering from existing trees is provided along Constitution Avenue at the street viewpoint level from within the National Mall and the Vietnam Memorial.

35. The document mentions a proposed new development for 10,300 employees at United Nations Plaza. Is this area/site shown in the document?

*NCPC Response:* The United Nations Plaza project is mentioned because it is being completed in conjunction with potential renovations of the Department of State building; however, this project is outside of the study area and therefore not mapped within the EA.

36. The legislative history of development on the Navy Hospital site (Act of February 25, 1931) requires the construction on the property to be subject to approval by the Public Buildings Commission, under the authority provided to the Commission by the Act of May 25, 1926. The Commission was abolished but its duties were assigned to the Secretary of the Interior through Executive Order 6666. The Commission in its design maintained the intention of Congress “that the public buildings program should harmonize with plans of the founders of the National Capital and as far as practicable realize their ideas and hopes.” In 1928, they determined that all buildings, whether public or semipublic, to be constructed along certain classical lines.” The proposed building design can be best described as following what classical line?

*NCPC Response:* Please see Response #33.

37. Please provide the document that names the area of the site Funkstown. Historic maps, instead report a development entitled Hamburg (1791).

*NCPC Response:* Foggy Bottom was originally called Hamburg by a Dutch gunmaker named Jacob Funk, who had settled the area in the mid-18th century. Jacob Funk, plotted a town for the area now containing the Navy's Potomac Annex and planned to call it Hamburg, but it was called Funkstown by the local inhabitants and never fully developed. This information is cited in several documents and books reviewing the history of Washington, DC, including *The Secret Architecture of Our Nation's Capital* by David Ovason, and *A Hilltop in Foggy Bottom – Home of the Old Naval Observatory and the Navy Medical Department* by the Bureau of Medicine and Surgery, Department of the Navy, Washington, D.C.

#### NEPA Identified Impacts and Mitigation.

The project's preliminary design is established with mitigation, as set forth in the EA and implemented within the preliminary site and building plans. Under the criteria for determination of significant effects established within NEPA, the Council on Environmental Quality regulations, and the Commission's environmental policies and procedures, the preliminary site and building plans for the Institutes building will not cause significant impact to the human environment.

The EA specifies, and the preliminary design includes, a number of mitigation measures to alleviate environmental impacts for the proposed project.

Planning Impacts. The proposed new building would be in compliance with the relevant requirements and guidelines established by federal and local planning policies. Under the proposed action, the site would remain under federal ownership and would therefore not be subject to local zoning regulations. In the context of the 1910 Height of Buildings Act, The planned height of the proposed headquarters is less than the 130-foot limit established by the Act for the vicinity of the project.

With regard to the Shipstead-Luce Act, The plan and design for the proposed headquarters are being coordinated with the Commission of Fine Arts (CFA). The project has been reviewed by that body both in November 2002 and in November 2005. The project will continue to be reviewed by, and is subject to final approval by, the CFA. No significant planning effects are in conflict with any of the established review requirements applicable to the approval process of federal projects in the District of Columbia.

Cultural Resources–Historic features. The National Historic Preservation Act, Section 106 consultation, was initiated by the Institute in December 2005 and has involved coordination with appropriate agencies and identified stakeholders.

NCPC hosted an initial public EA scoping/Section 106 initiation meeting on November 16, 2005 to provide an opportunity for interested members of the public, agencies, and interest groups to learn about the project, ask questions, provide comments, and identify concerns they feel should be addressed during the review process. A formal Section 106 consultation and initiation

meeting was also held on December 14, 2005, by the Institute. During this meeting historic properties in the vicinity of the project site were identified, an Area of Potential Effect (APE) for the project was determined, and consulting parties were identified. An initiation letter was sent from the Institute to the DC SHPO on December 14, 2005 to formally identify the APE and issues of possible concern.

A second Section 106 consultation meeting was held on March 7, 2006. The meeting focused on the visual context of the proposed project, using a comparison of the proposed project to existing buildings including massing, setbacks, and elevations; visual simulations from selected vantage points; and potential illumination levels as analyzed in a detailed illumination study.

The construction of the new headquarters on the proposed site has the potential to affect the historic L'Enfant and McMillan Plans. On Constitution Avenue, the proposed headquarters would respect the established building line of the Avenue as reflected on the preliminary site plan. The open pedestrian plaza on the south side of the building mirrors the open building yards on the north side of Constitution Avenue, and would maintain the openness of the Constitution Avenue vista as depicted on the preliminary submission materials.

North of the site, the Old Naval Observatory is sited within a dense urban setting. The construction of the proposed headquarters would not change the character of that setting. In addition, the new building would not obstruct a view from the Lincoln Memorial to the dome of the Observatory.

Coordination and Section 106 consultation with the DC SHPO has continued with development of the preliminary design and the establishment of a draft Memorandum of Agreement (MOA). Issues addressed by the draft include the full detailing of the process for review and establishment of the building illumination levels that are further noted under the visual impact discussion below. NCPC staff finds the planned use of this mitigation measure appropriate and adequate to address the impact. The preliminary design submission has specified the draft MOA which is being reviewed by the DC SHPO.

Visual Impacts. The Lincoln Memorial, located south of the proposed headquarters site, is set upon a raised terrace, making it a structural and landscape feature at the west end of the National Mall. The proposed headquarters building would be lower in elevation than the Lincoln Memorial and would thus not compete with it visually. Additionally, the Institute's building is being situated along a periphery Avenue bounded by landscape features, and adheres to established setbacks and building lines of that streetscape. The new structure maintains a recessive presence in comparison to the open space and terminal focal-point vista of the Lincoln Memorial.

The headquarters building would replace a terraced asphalt parking lot with an architecturally rich building, similar in massing and elevation to surrounding structures north of Constitution Avenue. The building would not be visible from the eastern end of Constitution Avenue. At that vantage point, the building would be obscured by trees and its alignment with existing buildings diminishes its presence.

The National Mall and portions of West Potomac Park directly across Constitution Avenue to the south would not be significantly impacted by the building location. Views of the new structure

will be evident from the Vietnam Veterans Memorial. However, although the headquarters would be visible, the building will be partially shaded by existing trees and the site development of the proposed Vietnam Veterans Memorial Center located at the east side of Bacon Drive. Additionally, the Park Service's bus queuing space at Bacon Drive will interrupt any view from the Mall area and Reflection Pool toward the Institute's building location.

The EA analyzed visual effects through visual simulations from distances as identified by the DC SHPO, and consulting parties in the Section 106 process, to assess the visual impact of the proposed headquarters on the surrounding areas. Simulations were completed from across the Potomac River, at Netherlands Carillon on Arlington Ridge, and near Lady Bird Johnson Park along George Washington Memorial Parkway. As a result of a request during further Section 106 consultation meetings, an aerial simulation was also completed. Although the proposed headquarters would be visible from a distance across the Potomac River from the site; the proposed headquarters would be consistent in elevation and massing, and would fit in among the existing development of this area. The USIP building would not interfere with existing views or significantly change their character. Thus, impacts to these views would be minor. Further comment from the DC SHPO is anticipated through the draft MOA process. The preliminary design submission has specified the draft MOA which is being reviewed by the DC SHPO and which will be finalized as the project final designed is developed.

Lighting effects were identified by the Section 106 process and the EA evaluation as an issue of visual concern by many. Additionally, in their review of the project, the Commission of Fine Arts expressed that the building must not "outshine the nearby monuments" and that the illumination must be "controlled so that it produces a soft and subtle glow."

A lighting analysis was prepared by the Institute's design consultant that was provided to both the Section 106 consultation process and the EA analysis. The analysis involved a review of the nearby monuments and buildings as well as computer modeling techniques that aided in predicting the expected luminance levels of the proposed facility. The model can simulate lighting levels to predict the nighttime exterior brightness of the structure relative to nearby monuments and memorials. The study involved a comparison of the *measured* brightness of nearby memorials and other lighted buildings to the *predicted* brightness of the proposed headquarters roof and glazed areas.

The estimated luminance of the project would be visible from the intersection of 23rd Street and Constitution Avenue, with a maximum illumination level occurring where the curves of the roof come together. The measured brightness of the proposed headquarters would not exceed that of nearby monuments, memorials, or buildings, particularly the Lincoln Memorial. The perceived brightness is possibly less as a result of the setting of the headquarters within an already developed area, amongst other lit buildings. The analyzed roof glow would be a result of the interior lighting filtering through a highly diffusing roof, with no exterior lighting beyond roof eave up-lighting. Lighting will be able to be dimmed to any level from full to zero in the design that is being established. The preliminary design further implements the adjusted light features of the project and complies with the desired emphasis of the Commission of Fine Arts to limit light from the new building. Furthermore, the draft MOA specifies measures to be undertaken by the Institute to demonstrate and comply with the agreed upon lighting levels. NCPC staff finds the draft MOA notes this provision and the use of this mitigation measure as specified and controlled by the MOA is appropriate and adequate to address the effect.

Transportation impacts. Transportation impacts are estimated based on the transportation analysis completed by Wells and Associates in the EA analysis during early 2006. The future volumes are forecasted based on background future traffic volumes, displaced parking lot traffic, replaced parking lot traffic, future site-generated trips, and future land use and traffic controls.

The distribution of peak hour site-generated trips for the new building were determined based on existing traffic counts, local knowledge, previous area studies, and engineering judgment. It is estimated that approximately 25 percent of all site-generated trips would approach from the north on 23<sup>rd</sup> Street, NW; 25 percent from the east on Constitution Avenue; 20 percent from the west of Interstate Route 66 (U.S. Route 50) onto Constitution Avenue; and 30 percent from the south on 23<sup>rd</sup> Street, traveling on Route 50 and the Arlington Memorial Bridge. Vehicular access to the headquarters' port cochere, parking garage, and truck dock would be provided by a driveway located approximately 353 feet north of Constitution Avenue and 63 feet south of C Street. The proposed headquarters and replacement parking is estimated to cause minimal increase in trip generation, increasing the morning peak hour trips from 31 to 33 and afternoon peak hour trips from 29 to 31. It is estimated that 33 percent of Institute employees would drive alone or carpool and 67 percent would commute by public transportation, bicycle, and/or walking.

Total future intersection levels of service were calculated at the study intersections based on future lane use and traffic controls, total future peak hour vehicular traffic forecasts, existing traffic signal timings, and the Synchro capacity analysis technique. The proposed access point oriented to 23<sup>rd</sup> Street was evaluated under signal control. The existing signals at C Street, the U.S. Navy Annex driveway, and the proposed headquarters driveway signal were assumed to operate as a demand responsive, clustered system. Consistent with future conditions without the proposed headquarters, all of the study intersections operate at acceptable LOS "C" or better during both the morning and afternoon peak hours, with the exception of the stop sign controlled exit approach from the American Pharmacists Association building. A minor increase in delay was observed due to the increase in site development traffic nearby. The 23<sup>rd</sup> Street/ Constitution Avenue intersection would continue to operate near capacity. The site entrance operating under pre-timed conditions with the adjacent signals would operate at an overall LOS "A" or better during the peak periods. Consistent with pre-timed signal conditions, the actuated, loop detector, or video system, signal continued to operate at an overall at LOS "A" or better. Overall, roadways would continue to operate at approximately the same levels; therefore, negligible impact would occur.

Temporary impacts resulting from construction activities at the site would result from construction vehicles accessing the site. Access to the site by construction vehicles would be consistent with District regulations. In order to minimize impacts of construction activities associated with the proposed headquarters, construction activities would be conducted in accordance with the District of Columbia controls listed in the Manual on Uniform Traffic Control Devices and any other applicable District of Columbia construction control requirements.

In terms of cumulative impacts, it has been determined that the American Pharmacists Association addition with the Institute garage traffic could result in traffic delays at the intersection of Constitution Avenue with 23<sup>rd</sup> Street, which would continue to operate at LOS D. NCPC submission requirements for project review require that a Transportation Management Plan (TMP) be prepared for federal employment facilities that encompass 500 or more personnel.

Based upon the estimated 240 employees to be located at the proposed headquarters, a TMP would not be necessary; however, a TMP will be prepared for conferences and events held at the proposed headquarters as indicated by USIP. The Institute will submit its TMP to the NCPC for review during the final project submission phase when programming, personnel numbers, and event attendance estimates are more firmly established. NCPC staff finds the planned use of the TMP for mitigation of transportation effects from the proposed plans appropriate and adequate to address the potential impacts.

Visitation effects. The proposed headquarters development is expected to result in a slight increase in visitor activity to the site and surrounding area. Visitors to the Public Education Center would be expected to be coming from the nearby National Mall attractions as well as by arranged tours. It is expected that the Public Education Center would attract 1,000 to 1,500 visitors on an average day during peak season during the first ten years of operation. Institute consultants cite that the attendance pattern for the Public Education Center would ramp up to a stabilized level, rather than an initial peak followed by a fall off in attendance. Once the new facility is established, demand will be maintained by the Institute's exhibits, and through the Institute's marketing and promotional efforts. A stabilized attendance in the year 2010 is estimated at 421,000 annually. This reflects a steady-state level of attendance which would follow the initial build up. Overall, the proposed headquarters would not be expected to significantly increase visitation to the nearby surrounding area given the popular venues that exist in West Potomac Park and the National Mall. Enhancement of the visitor experience in this area of the National Mall would result in a long-term benefit by creating an accessible site location for educational and seminar space, and which can be integrated into an existing visitor/tourist destination area of the city. No significant adverse impacts are anticipated from the numbers of visitors anticipated and described in the EA.

Public Transportation Impacts. Visitors to the headquarters would likely include pedestrians from the National Mall, visitors who were already dropped off by public transportation at an attraction nearby, and those dropped off directly at the site, arriving by arranged group transportation. Visitors to the proposed headquarters would not likely cause a significant increase in demand for public transportation. Most conference center attendees would be expected to arrive to the headquarters by public transportation or taxi. A lay-by lane would accommodate school, tour and shuttle buses, automobiles, and taxis accessing the headquarters. The proposed lay-by lane is located on the western side of 23rd Street and would be approximately eight feet wide and 97 feet long with 18 feet of angled transition space at each end. This area would enable passenger pickup and drop-off without impeding traffic on the southbound 23rd Street. The EA traffic analysis has found the lane location would not adversely impact the traffic volume on 23<sup>rd</sup> Street since the time of use for the lane (south bound access only) would not correspond to peak rush hour volumes. Bus access to the site with the lane would improve transit access to this area of 23<sup>rd</sup> Street overall. NCPC staff finds no significant effects from the project regarding public transportation impacts.

#### National Historic Preservation Act

The USIP is conducting the Section 106 consultation for this undertaking. The Section 106 review is considering the effect of the proposed headquarters on historic properties in the Area of Potential Effect, particularly on the visual effects of the building—day and night—on historic buildings and parks. A gateway to the monumental core, the site is visible from the Roosevelt

Bridge and from Memorial Bridge. The building will be seen in the contexts of: the historic Plan of Washington (L'Enfant and McMillan Plans); the Lincoln Memorial and West Potomac Park; the row of Beaux Arts-style institutional buildings facing Constitution Avenue; the Navy's Potomac Annex, which includes the National Historic Landmark Old Naval Observatory; and the Northwest Rectangle complex of federal buildings, including the State Department.

The Institute held two consultation meetings, on December 14, 2005 and March 7, 2006, during which the proposed building was reviewed through the use of visual simulations and computer modeling of expected luminance levels. The measured brightness of nearby memorials and buildings was compared to the predicted brightness of the proposed building. The study found that the brightness of the proposed building would not exceed that of nearby memorials or buildings. NCPC staff, the D.C. State Historic Preservation Officer, and the National Park Service anticipate further review of the luminance of the roof as the building nears completion of construction.

The height and setback of the proposed building is consistent with the buildings facing Constitution Avenue. Views from the Lincoln Memorial to the Old Naval Observatory were determined by USIP to be unobstructed. The removal of the Potomac Annex parking lot is deemed a benefit to Constitution Avenue.

The property has been graded or sufficiently disturbed by various 20<sup>th</sup> century development actions. There are no previously recorded archaeological sites at the Potomac Annex or nearby land parcels north of Constitution Avenue. It is expected that below-ground, physical remains of any former facilities on site could include utility trenches, landscaping deposits, and generalized refuse but these would be too modern to warrant consideration as significant archaeological resources. Although it is possible that prehistoric deposits could be present at the site, the extensive disturbance from urban development has likely reduced their integrity. The project site is considered to be of low or no archaeological significance because of the extensive disturbance and the lack of archival information that would suggest the presence of major archaeological resources.

A draft Memorandum of Agreement (MOA) has been circulated to address the potential for effects from the undertaking. The draft MOA stipulates that the USIP will ensure that viewsheds to and from the National Mall and the Lincoln Memorial be minimized through a combination of building siting, massing, and new tree plantings. Illumination of the building will be limited to interior lighting that filters through a diffusing roof. Luminance of the building will be measured with a luminance meter, with measurements being made at selected vantage points such as the Lincoln Memorial Grounds, Roosevelt Bridge, and Memorial Bridge. Onsite review of the building luminance is anticipated as the building is nearing completion.

Invited Section 106 participants include the D.C. State Historic Preservation Office, the Advisory Council on Historic Preservation, NCPC, the National Park Service, the D.C. Office of Planning, the Commission of Fine Arts, Advisory Neighborhood Commission 2A05, the Department of the Navy, the American Pharmacists Association, the National Academy of Sciences, the Federal Reserve, the Department of State, the Kennedy Center, the Architect of the Capitol, the National Coalition to Save our Mall, the Committee of 100 on the Federal City, the D.C. Preservation League, and the National Trust for Historic Preservation.

### Development Program

Applicant: U.S. Institute of Peace

Estimated Cost: Total prospect costs to design, construct, equip, and furnish the facility are still under study. Funding is organized as a public-private partnership. The U.S. Congress appropriated \$99.2 million for the headquarters building in the FY 2005 Consolidated Appropriations bill. Slightly more than \$3.5 million has already been raised from the private sector.

Architect: Moshe Safdie and Associates of Somerville, Massachusetts, is the design architect.

Completion Date: Late 2009 or early 2010

### Federal Capital Improvements Program

The applicant's submitted project is identified in the Commission's FCIP report, fiscal years 2007-2012. Funding is organized as a public-private partnership. The U.S. Congress appropriated \$99.2 million for the headquarters building in the FY 2005 Consolidated Appropriations bill.

## COORDINATION

### Coordinating Committee

The Coordinating Committee reviewed the proposal at its May 10, 2006 meeting, and forwarded the proposal to the Commission with the statement that the submission has been coordinated with all participating agencies. The participating agencies were NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the Department of Housing and Community Development; the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

### Commission of Fine Arts

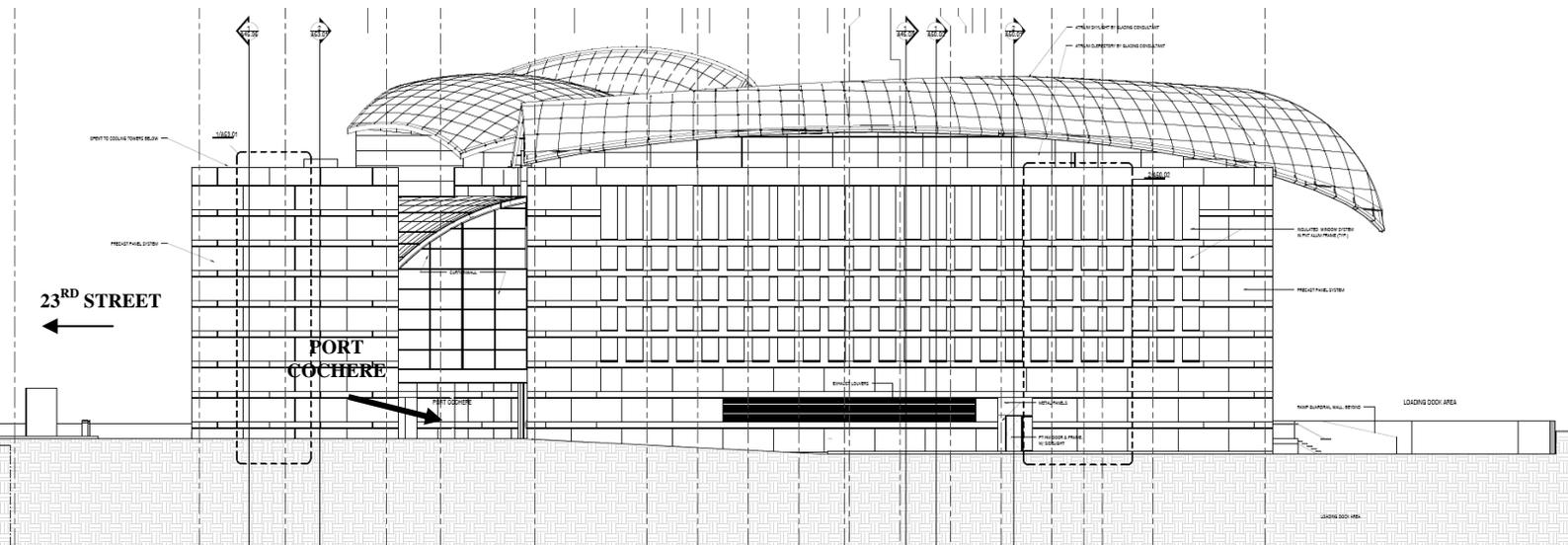
The Commission of Fine Arts reviewed and approved the USIP revised concept design at its meeting of November 17, 2005. The letter to the applicant on the action of the Commission of Fine Arts noted:

“As the design continues to develop, the members suggested that extra care and study be given to the configuration of the public entry plaza and garden at the southern part of the site, due to the need to buffer these areas from the busy intersection of 23rd Street and Constitution Avenue and the adjacent vehicular ramp leading to the Theodore Roosevelt Memorial Bridge.

The members also expressed concern about the amount of light that would emanate at night from the building's extensive glazing and its translucent roof. They recommended that light levels within and around the structure be carefully analyzed. The building's illumination should be controlled so that it produces a soft and subtle glow that will not outshine the nearby monuments on the National Mall, particularly the Lincoln Memorial. The Commission looks forward to the

review of the design as it continues to develop, including any provisions for perimeter security and the selection of building and landscape materials.”

The applicant has responded to the Commission of Fine Arts in the current proposal by revising the site design to provide additional perimeter buffer area at Constitution Avenue and modification of the west landscape garden area. This area is only accessible through the building.



**NORTH BUILDING ELEVATION AT SERVICE DRIVE ADJACENT TO THE NORTH BOUNDARY**