

STAFF RECOMMENDATION

NCPC File No. 6666



LAFAYETTE BUILDING
BUILDING MODERNIZATION & PERIMETER SECURITY
811 Vermont Avenue, NW
Washington, DC

Submitted by the General Services Administration

April 27, 2006

Abstract

The General Services Administration (GSA) has submitted preliminary building plans for the modernization of the Lafayette Building, located at 811 Vermont Avenue, NW and a concept design for its perimeter security. The modernization project will upgrade and alter the interior, clean the exterior, repair or replace windows, and upgrade the ventilation system to improve building performance. The building is a contributing structure in the Fifteenth Street Historic District and has been proposed by the National Park Service for nomination as a National Historic Landmark (NHL).

Commission Action Requested by Applicant

Approval of the (preliminary) building plans for building modernization; and review and comment on the (concept) design for perimeter security; pursuant to 40 U.S.C. § 8722 (b)(1) and (d).

Executive Director's Recommendation

The Commission:

Approves preliminary building plans for modernization of the Lafayette Building at 811 Vermont Avenue, NW, as shown in NCPC Map File No. 21.00(38.40)42025.

Recommends that GSA use the Decision Support Tool developed by GSA's Office of the Chief Architect to develop the Design Basis Tactics and Level of Protection as recommended in the Interagency Security Committee (ISC) Security Design Criteria for New Federal Office Buildings and Major Modernization Projects.

Recommends that in further development of the design for perimeter security, GSA:

- Develop a variety of hardened streetscape elements along Vermont Avenue as proposed for this area in the National Capital Urban Design and Security Plan, and coordinate the design for both sides of Vermont Avenue between Lafayette and McPherson Squares.
- Preserve the building's historic retail uses along 15th Street, and coordinate with retail tenants and the Downtown Business Improvement District to ensure that adjacent security elements do not impede the area's commerce and vitality.
- Coordinate with the adjacent property owner to develop design strategies for providing perimeter security at the public alley from 15th Street.

Advises the applicant that the perimeter security portion of the project as proposed does not meet any of the Commission's criteria for categorical exclusion under the National Environmental Policy Act, in which case an environmental assessment may be required to accompany the preliminary submission.

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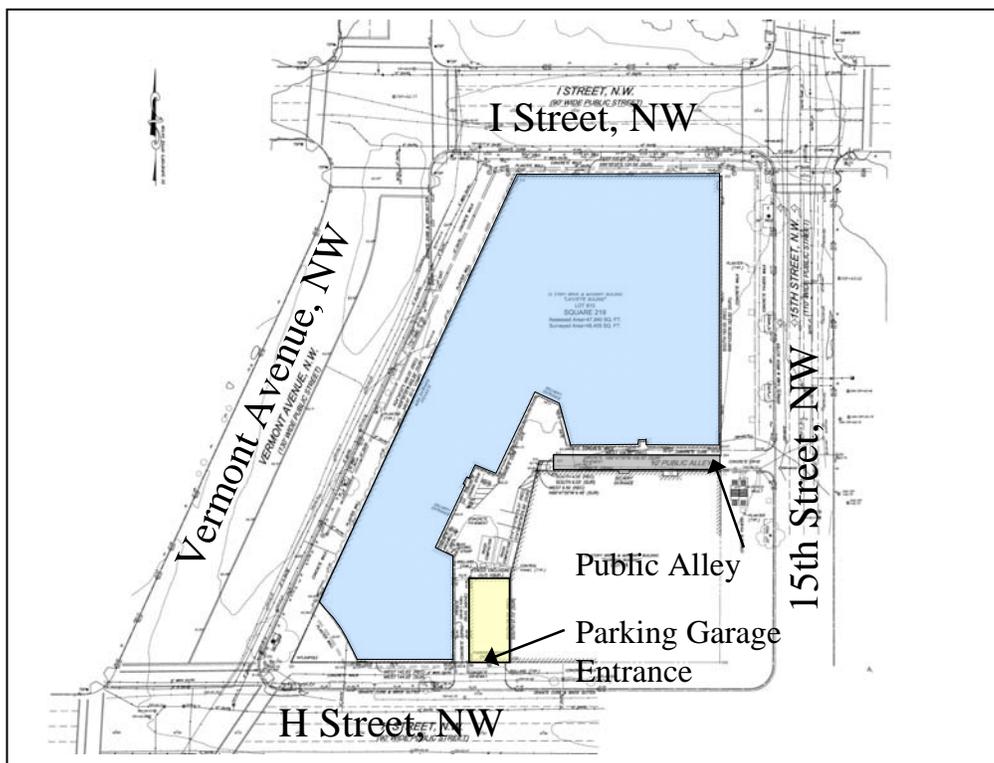
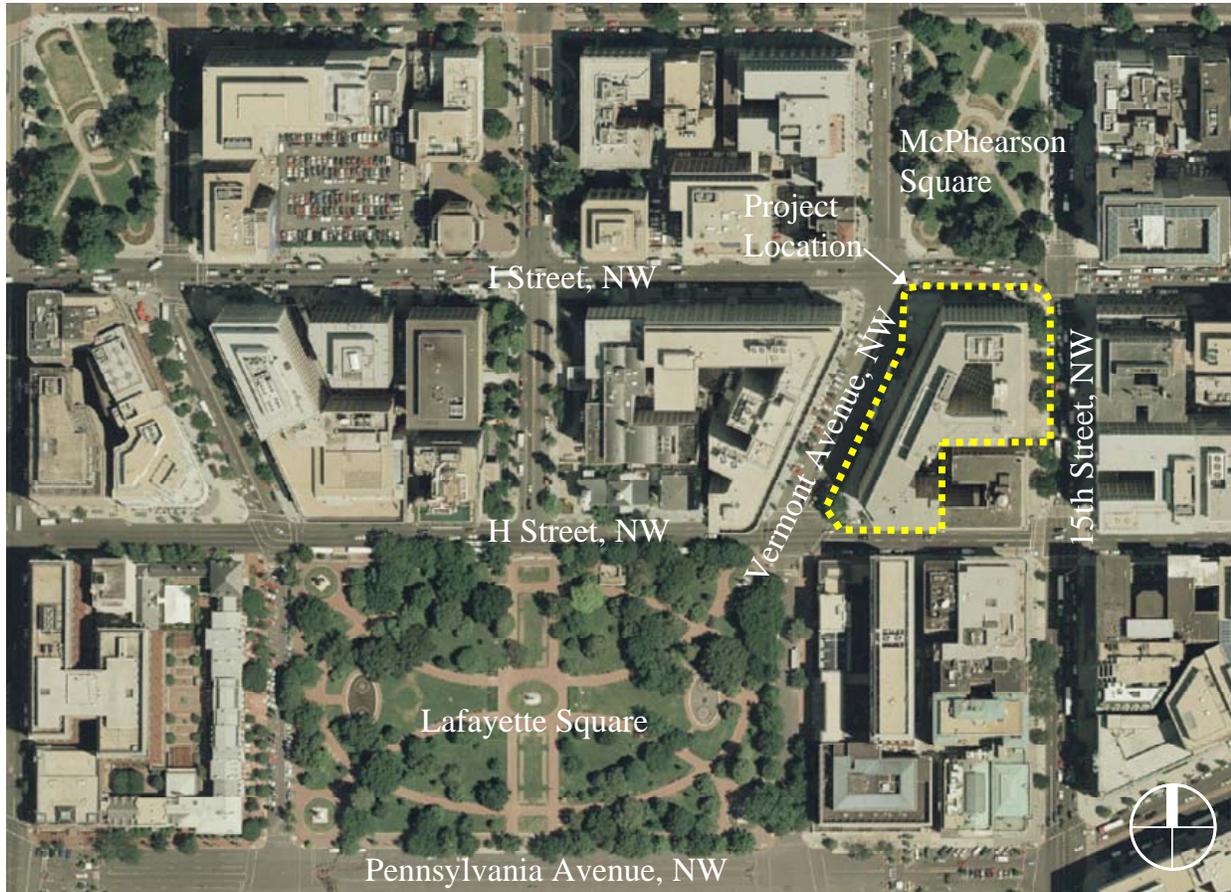
PROJECT DESCRIPTION

Site

The Lafayette Building is on the block bounded by Vermont Avenue and 15th, H and I Streets Northwest. Its main entrance is on Vermont Avenue. The building occupies two thirds of the block and wraps around the Shoreham Building. There are entrances to an underground parking garage from H Street. The rear of the building faces an 'L' shaped alley which originates on H Street, alongside the garage entrance, and which exits onto 15th Street. This alley provides service access for both the Lafayette and Shoreham Buildings. Ground floor retail lines 15th Street between the alley and I Street. McPherson and Lafayette Squares are to the north and southwest, connected by the diagonal avenue. The building is in the Fifteenth Street Historic District.

Background

The building houses the Export-Import Bank (EXIM) and several departments of the U.S. Department of Veterans Affairs (VA). Built in 1940, it was one of the first government office buildings in the city to be centrally air-conditioned and to include a built-in garage. The current proposal includes an extensive renovation in order to achieve a GSA class A status, and perimeter security enhancement. At its March 7, 2002 meeting, the Commission approved preliminary and final site development plans for temporary installation of concrete planters at the main entrance to the Lafayette Building, which GSA would replace with permanent security elements once the Interagency Security Task Force completed its Urban Design and Security Plan for the Downtown area. On August 5, 2005 the Executive Director approved the preliminary and final site and building plans for installation of three security cameras.



Site: Aerial (above) and Existing Plan



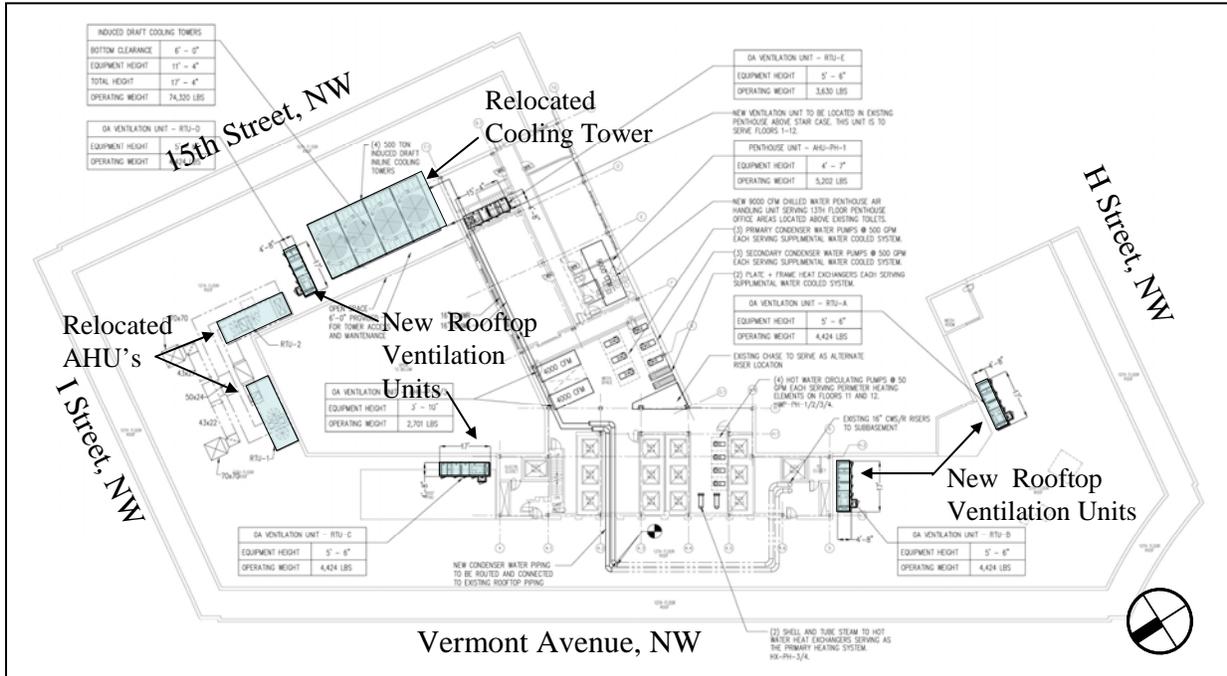
Building Exterior at Intersection of Vermont Avenue & H Street, NW

Proposal

Building Modernization (Preliminary Building Plans)

GSA plans to update and remodel the building interior in order to provide a class “A” building for its occupants. The proposed preliminary building plans would refurbish the interior and exterior finishes and upgrade all building systems and would include:

- Reconfiguration and upgrade of interior space, including partial removal of original corridors and restoration on three levels to exemplify original condition,
- Skylight installation and landscape at the third floor interior courtyard,
- Repair of original steel and bronze storefronts and upper story windows and new interior storms for blast protection, or installation of new thermally broken aluminum windows,
- Repair of exterior masonry, and
- Relocation replacement, and/or new exterior mechanical equipment:
 - Relocation of existing rooftop cooling tower (17’-4” high) from the Vermont Avenue side to the 15th Street side,
 - Relocation of two existing rooftop air handling units further in from I Street side,
 - Removal of two at-grade ventilation units in the Vermont Avenue building yard,
 - Installation of four rooftop ventilation units (5’-6” high).



Rooftop Equipment

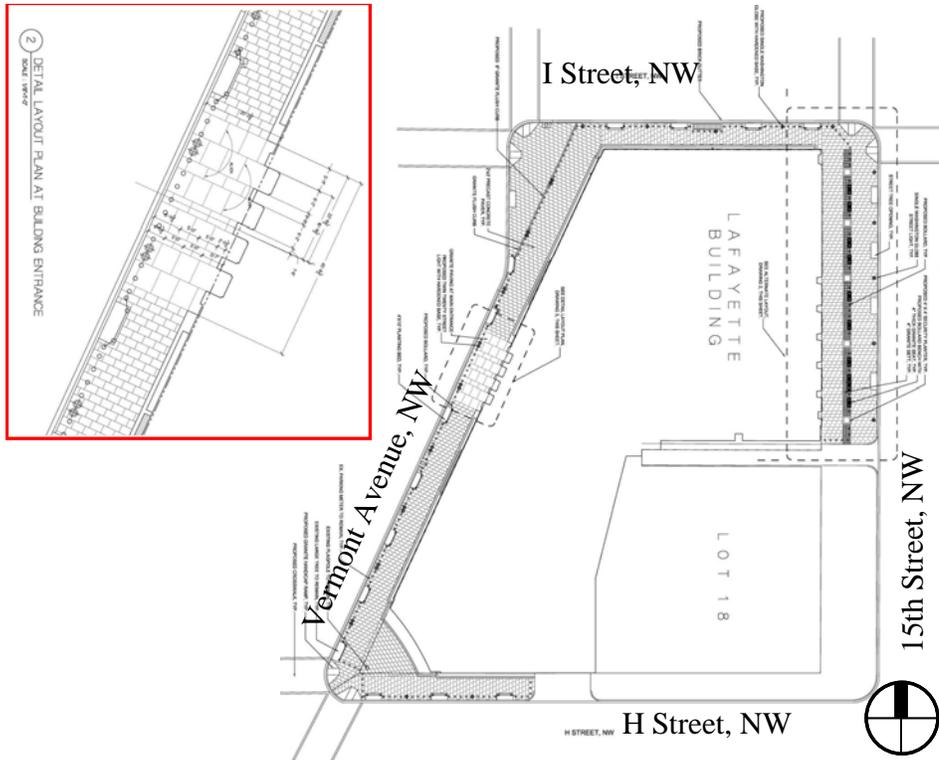


Vermont Avenue & H Street, NW Elevation

H Street, NW Elevation

Perimeter Security (Concept Submission)

The proposal would upgrade building security around the perimeter of the building site. In general, the line of perimeter security along Vermont Avenue and H and I Streets would run parallel to and one foot eight inches from the curb. The proposed line of perimeter security along 15th Street would be located down the middle of the existing approximately 40 foot wide sidewalk. Perimeter security elements would cross the sidewalks in locations adjacent to existing driveways and street intersections, as well as along the original curblines at Vermont Avenue. The following summarizes the perimeter security elements and site improvements around the building:



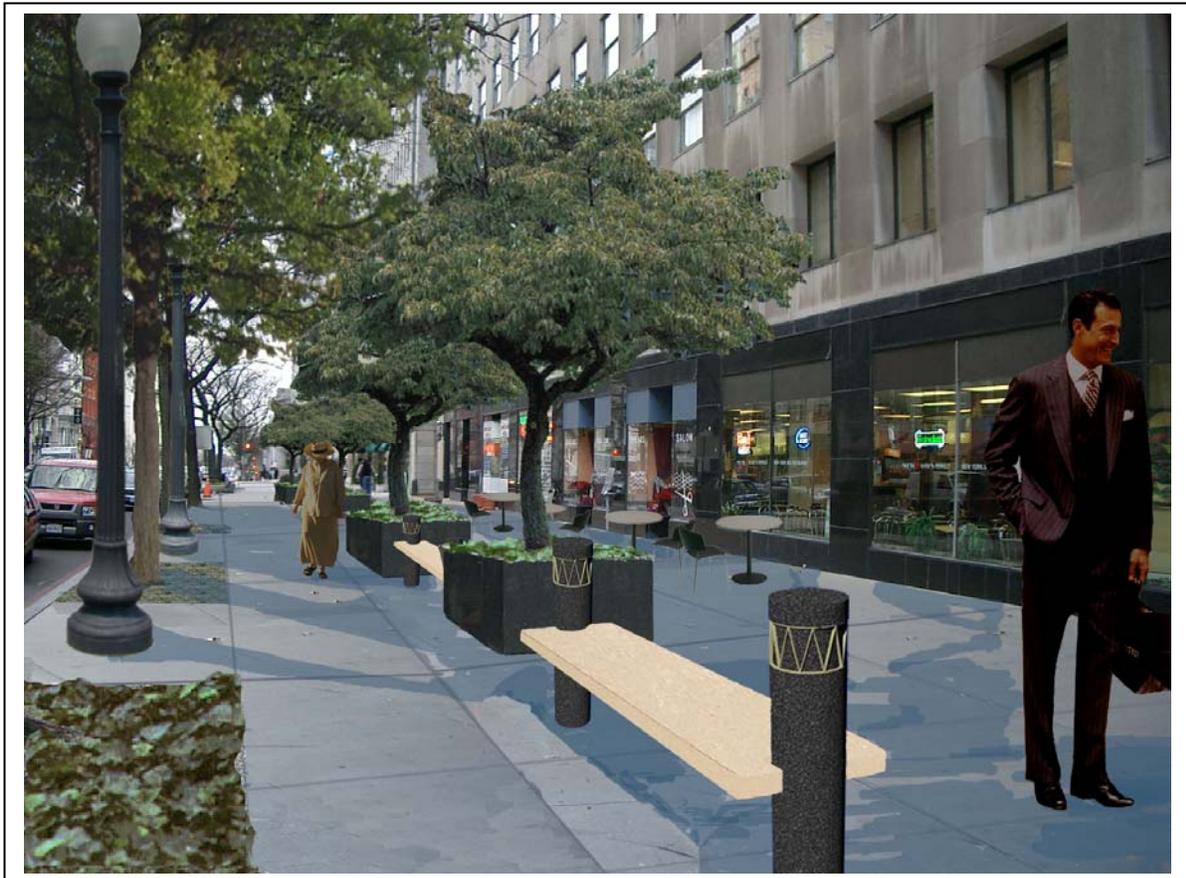
Proposed Perimeter Security

- Vermont Avenue:
 - Bollards: 39 inches high, 13 inches in diameter, spaced 40 inches apart, 1' – 8" from the curblines except at north corner of Vermont Avenue, where barrier line crosses sidewalk at original curblines.

- 15th Street:
 - Bollards: 39 inches high, 13 inches in diameter, spaced 40 inches apart, 20 feet from the building face, down the middle of the existing 40-foot wide sidewalk
 - Bollards would be interspersed with bollard-benches and 4-foot by 4-foot planters.



Perimeter Security Proposed Along Vermont Avenue, NW



Perimeter Security Proposed Along 15th Street, NW

- H and I Streets:
 - Bollards: 39 inches high, 13 inches in diameter, spaced 40 inches apart, 1'- 8" from the curb.
- Site Improvements:
 - Pre-cast concrete, sidewalk pavers
 - Granite pavers across the sidewalk on Vermont Avenue at the main entrance and under the barrier line, and at 15th Street under the barrier line.
 - Street trees (new and replacement) in tree planting beds at curblines
 - Twin Washington globe streetlights at Vermont Avenue
 - Single Washington globe streetlights at H, I and 15th Streets

Development Program

Applicant:	General Services Administration
Architects:	DMJM Design/Lee and Associates
Acreage:	1.1 acre
Estimated Cost:	\$164,000,000
Schedule:	Building Modernization Phase 1 - April 2008 – November 2010 Building Modernization Phase 2 – November 2010 – June 2012 (Perimeter Security at end of Phase 2)

PROJECT ANALYSIS

Building Modernization

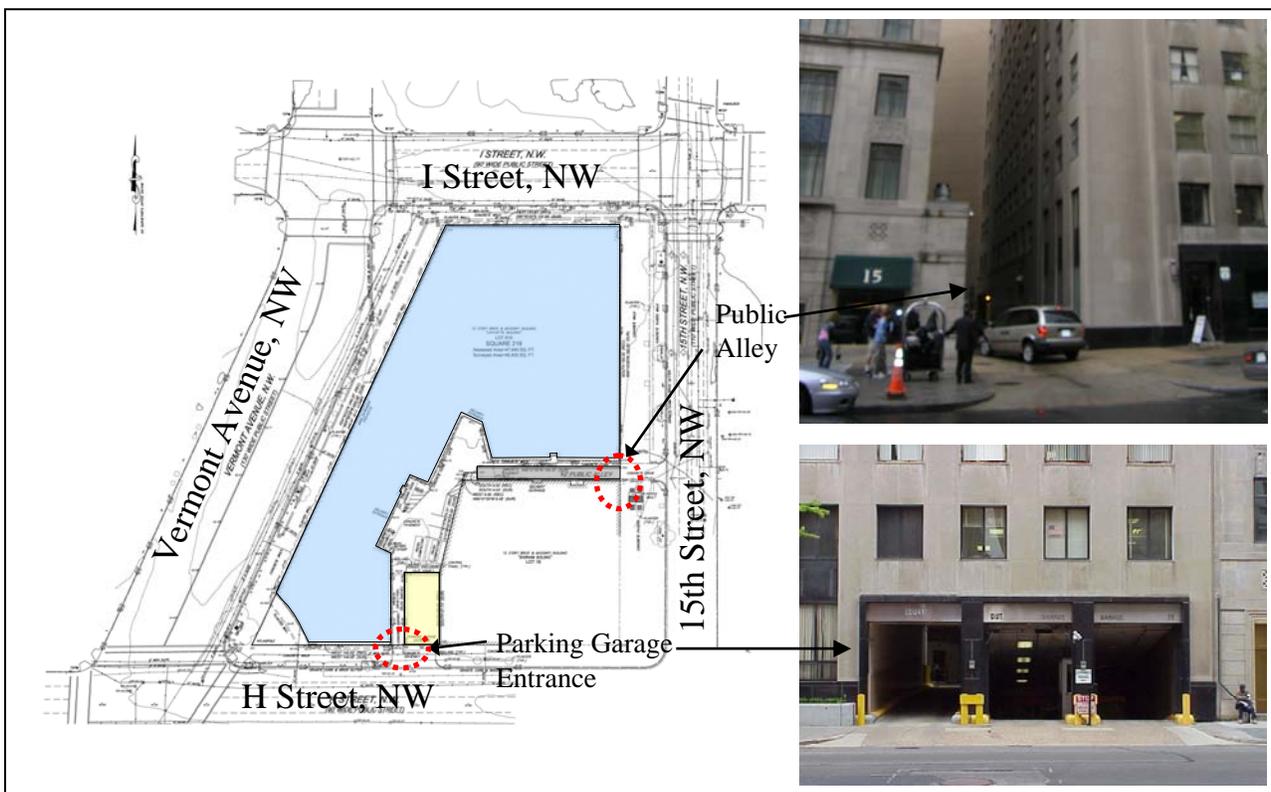
The building includes 8,919 usable square feet of ground floor retail along 15th Street. The proposal includes two alternates to convert some or all of this retail space to office space. The loss of this retail would have a significant effect on the existing character of the building and the vitality of the adjacent streetscape. Staff recommends that the applicant retain the retail space for the purpose for which it was originally designed.

At a consultation in November, 2005, GSA provided images for viewshed analysis showing how the new and relocated rooftop equipment would be seen from the ground, but only from points east, north and west. In that analysis, the applicant shows that the 17-foot high cooling tower would be visible 275 feet from the building on the east, 15th Street side.

In order to verify that the rooftop equipment would not have an adverse effect on historic views and vistas, staff recommends that the applicant include with the final submission materials simulations of views from points southwest, including Lafayette Park and the base of the Washington Monument, showing the impact of changes to the rooftop equipment.

Perimeter Security

Drawings show uncontrolled access points beyond the proposed barrier line, leaving these areas vulnerable. Unprotected access points include the public alley intersecting 15th Street, with use shared with the adjacent Shoreham Building, and the private drive-through for the Lafayette Building, with entrance from H Street. In addition, the ramp leading to underground parking has its entrance from H Street. Staff **recommends** coordination with the adjacent property owner to develop design strategies for providing perimeter security at the public alley from 15th Street. Staff **recommends** that the applicant consult further with staff from the District Department of Transportation (DDOT) and the DC State Historic Preservation Office (SHPO) as well as from NCPC in developing perimeter security that would minimize encroachment of public space and that would minimize its adverse effect on the historic L’Enfant streetscape.



Access Points

National Capital Urban Design and Security Plan (UDSP)

The UDSP states that “to establish the appropriate security response or level of intervention, individual agencies must conduct risk assessments to determine the magnitude of the security threat and the level of protection required for individual buildings.” Staff recommends that GSA use the Decision Support Tool developed by GSA’s Office of the Chief Architect to develop the Design Basis Tactics and Level of Protection, as recommended in the Interagency Security Committee (ISC) Security Design Criteria for New Federal Office Buildings and Major Modernization Projects.

The Lafayette Building is within the Downtown Contextual Area as identified in the UDSP. The UDSP includes differing recommendations for the grid streets and diagonal avenues.

15th Street: The design framework for grid streets in the Downtown Contextual Area recommends hardened components of the Downtown Business Improvement District's (BID) streetscape elements, including street light standards, tree fence enclosures, benches, bicycle racks, trash and newspaper vending containers, and the introduction of bollards. The current proposal is in general conformance with this recommendation with regard to H and I Streets, but varies in proposing a combination of planters, bollards and benches at in the middle of the sidewalk along 15th Street instead of at the curb. Staff is generally supportive of the proposed use of streetscape elements to frame the space for seating to serve ground floor retail, but is concerned that the proposed design and spacing of these elements will obstruct pedestrian access and reduce the viability of those retail locations. Staff recommends preserving the building's historic retail uses along 15th Street, and coordinating with retail tenants and the Downtown Business Improvement District to ensure that adjacent security elements do not impede the area's commerce and vitality. Photo simulations show two alternative placements of bollard benches.



Perimeter Security Shown Along 15th Street, NW

Vermont Avenue: For diagonal avenues such as Vermont Avenue, the design framework recommends a tree enclosure fence wall at the back of the planting strip next to the sidewalk, and a combination of benches, bollards and other hardened street furniture between the fence wall segments. The proposal is generally consistent with the

recommended location of security elements, but not the streetscape simulation provided shows only bollards, not the combination of elements recommended in the UDSP. Without the use of benches and fence walls, the palette of urban tools used remains limited.

More importantly, the greater context of the area has not been addressed. A sister federal building, also occupied by the Department of Veterans Affairs, (VA), faces the Lafayette Building from the west side of Vermont Avenue. The UDSP clearly anticipates a unified design for both sides of Vermont Avenue between Lafayette and McPherson Squares. The submission proposes solution for perimeter security for the Lafayette Building in isolation from the VA Building. Staff **recommends** that the applicant develop a variety of hardened streetscape elements along Vermont Avenue as proposed for this area in the National Capital Urban Design and Security Plan, and coordinate the design for both sides of Vermont Avenue between Lafayette and McPherson Squares.

National Capital Urban Design and Security Plan Objectives and Policies

Some elements of the proposal are inconsistent with Urban Design Objectives and Policies adopted by the Commission in August 2005 as an addendum to the *National Capital Urban Design and Security Plan* as, including the following:

- Previously noted alternatives that would convert some or all of the ground floor retail along 15th Street would be inconsistent with policies encouraging ground floor retail.
- While acknowledging that the Lafayette Building has no building yard to provide setback, staff also notes the commission policy stating the placement of security barriers in public space is discouraged and should be minimized, and recommends that the applicant provide additional justification for the spacing and location of security elements.
- Staff recommends that the applicant ensure that the placement of security elements is in conformance with NCPC and DDOT policies requiring 2 feet clear from the face of the curb to accommodate the opening of car doors.
- Staff recommends that the applicant expand the palette of security elements used along Vermont Avenue in accordance with NCPC policies against the repetitive use of single elements.

CONFORMANCE

Comprehensive Plan for the National Capital

Staff finds that the proposed project would not be inconsistent with the Comprehensive Plan for the National Capital's relevant policy under the Federal Workplace Element, largely due to GSA's demonstrated efforts to:

- Modernize and rehabilitate existing federally owned facilities in the monumental core for federal workplaces before developing new facilities.

However, the project may be inconsistent with the following policies under the Preservation and Historic Features Element, given that the DC SHPO has advised that it views the perimeter security proposal as an adverse effect.

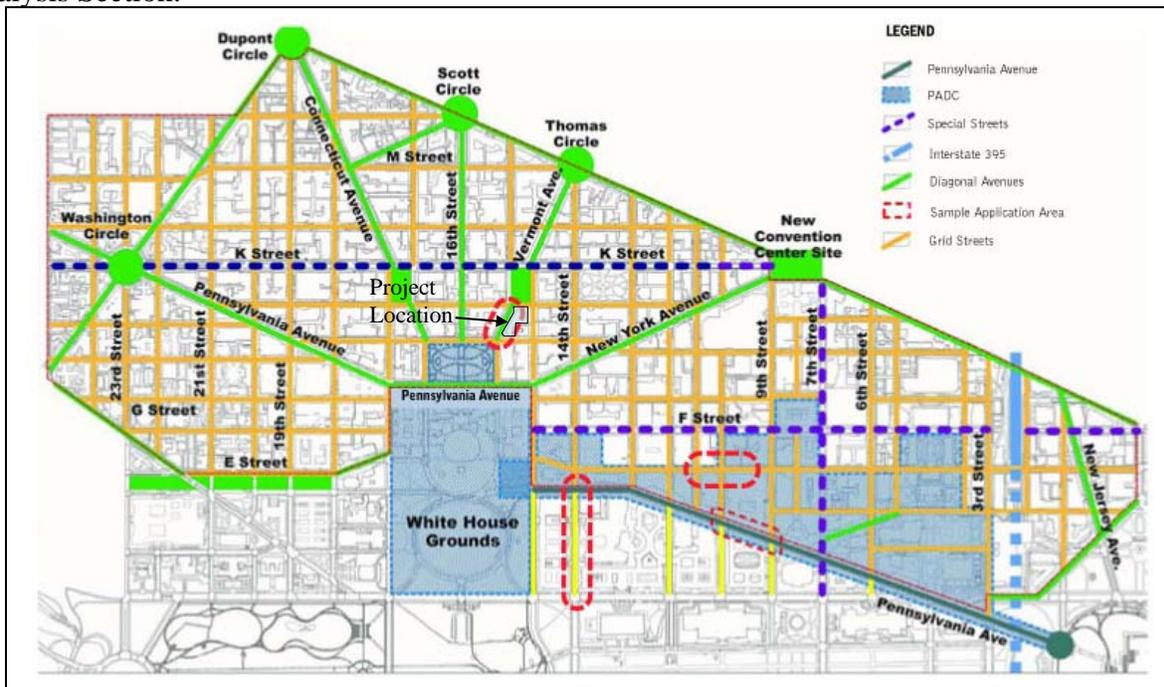
- Protect and enhance the vistas and views—both natural and designed—that are an integral part of the national capital’s image.
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.

Federal Capital Improvements Program

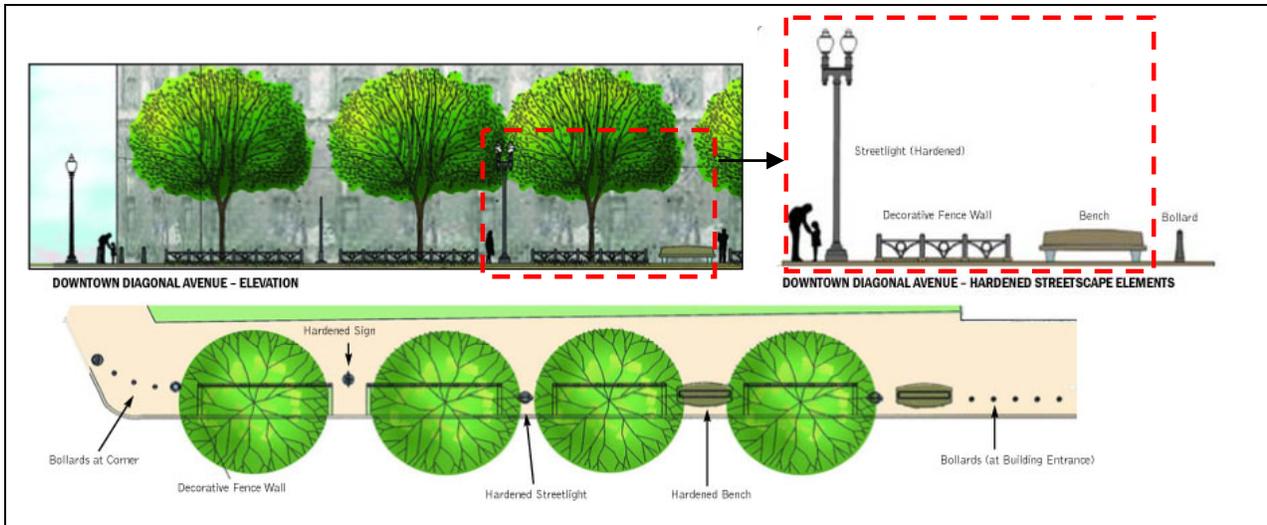
The Lafayette Building Modernization project is included in the Federal Capital Improvements Program for Fiscal Years 2006-2011, recommended and strongly endorsed by the Commission. Project cost is estimated at \$109,170,000. Prior funding of \$8,470,000 has been received.

National Capital Urban Design and Security Plan (UDSP)

The Lafayette Building is located within the Downtown Contextual Area of the *National Capital Urban Design and Security Plan (UDSP)* as adopted by the Commission in August 2005. For grid streets in this area, the design framework recommends hardened components of the Downtown Business Improvement District’s (BID) streetscape elements, including street light standards, tree fence enclosures, benches, bicycle racks, trash and newspaper vending containers, and the introduction of bollards. For diagonal avenues such as Vermont Avenue, the design framework recommends a tree enclosure fence wall at the back of the planting strip next to the sidewalk, and a combination of benches, bollards and other hardened street furniture between the fence wall segments. The proposal is generally consistent with these recommendations, except as noted in the Analysis Section.



Downtown Contextual Area and Street Typology



Downtown Diagonal Avenue Sample Application – Area Plan

The National Capital Urban Design and Security Plan Objectives and Policies

The proposal is generally consistent with the Urban Design and Security Objectives and Policies adopted by the Commission in August, 2005 as an addendum to the UDSP, except for the following:

C.1. Barrier Placement and Design

2. Habitable building space should be provided along the street frontage to accommodate public space or activated ground floor uses, such as retail or other commercial enterprises, as appropriate.
6. The placement of security barriers in public space is discouraged and should be minimized.
12. Placement of security barriers should incorporate best design practices and be arranged to:
 - g. Ensure that maintenance equipment such as snow plows, utility trucks and motorized cleaners can access and maneuver within building yards, sidewalks, and plazas.
 - h. Provide at least 2 feet from the face of the curb to the face of the barrier to allow for opening car doors, unloading and loading of passengers, and ease of access to public space.

C.2. Urban Landscape Contextual Design

20. Perimeter security design should avoid relying on repetitive use of single elements, such as continuous rows of bollards or planters.

C.4. Comprehensive Streetscape Design

31. The Capital's monumental avenues, such as Pennsylvania, Constitution, Independence, Maryland, Virginia and New Jersey Avenues should receive special treatment to ensure that security projects are addressed comprehensively, emphasizing the streetscape as a whole with attention to their axiality and formality.

National Environmental Policy Act

The General Services Administration has concluded that the proposed project qualifies as a Categorical Exclusion in accordance with GSA requirements under the National Environmental Policy Act (NEPA). NCPC has an independent obligation under NEPA and staff will review the perimeter security portion of the project as it proceeds toward preliminary design to determine whether the project qualifies as a categorical exclusion under NCPC procedures developed to implement NEPA. The project as proposed does not meet any of the Commission's criteria for categorical exclusion under the National Environmental Policy Act, in which case an environmental assessment may be required to accompany the preliminary submission. The mechanical equipment portion of the project qualifies as a categorical exclusion in conformance with the NCPC requirements under §8(C)(21).

National Historic Preservation Act

In addition to its inclusion in the Fifteenth Street Historic District, the Lafayette Building has been proposed for nomination by the National Park Service for listing as a National Historic Landmark. GSA determined that the proposed removal of interior fabric and alteration of interior spaces in order to insert new mechanical systems would have a potential adverse effect on the original corridors and offices. GSA proposes developing an MOA among GSA, the DC SHPO, NPS and the ACHP, if it chooses to participate, in order to mitigate these effects. GSA has consulted with staff of the DC SHPO, CFA and NCPC, on the interior alterations and rooftop alterations and has developed a design approach to mitigate the adverse effect of the loss of the original corridors on some floors. The DC SHPO has advised that it views the perimeter security proposal as an adverse effect, and recommends a reconsideration of the need for a physical security perimeter.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed the proposal on April 12, 2006, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies represented, the participating agencies were: NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the Fire Department; the General Services Administration, and the National Park Service.

DC Department of Transportation (DDOT)

The sidewalk around the Lafayette Building is public space under DDOT jurisdiction. As such, it will require a Public Space Permit and must comply with DDOT Public Space Security Policies.