



THE WHITTLE SCHOOL AND STUDIOS IMPROVEMENTS

4000 Connecticut Avenue, NW
Washington, DC 20001

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations (40 CFR, Parts 1500-1508), and the National Capital Planning Commission's (NCPC) Environmental Policies and Procedures, I have evaluated the preliminary and final building plans for Exterior Improvements at the Whittle School and Studios (formerly the INTELSAT Headquarters Building) as shown on NCPC Map File No. 72.00(38.00)44919 and the Whittle School and Studio Improvements Environmental Assessment (EA) prepared by the National Capital Planning Commission. The property known as 4000 Connecticut Avenue, NW (Square 2055, Lots 803, 804, 805, and 806) (Subject Property), is located within the International Chancery Center ("ICC"), a 47 acre federal facility that is generally bounded by Yuma Street, NW on the north, Tilden Street, NW on the south, Connecticut Avenue, NW and the University of the District of Columbia ("UDC") on the east, and Reno Road, NW on the west. Van Ness Street, NW bisects the ICC into two quadrants. The EA is incorporated into this Finding of No Significant Impact (FONSI) by reference. Based on the foregoing, I have determined that the Action Alternative (Alternative 1) will not have a significant impact on the human environment and therefore an Environmental Impact Statement will not be prepared.

Purpose and Need

The purpose of the Proposed Action is to facilitate the conversion of the former INTELSAT headquarters building to the educational use that has been approved by the Department of State, specifically the Whittle School and Studios. The Proposed Action is needed in order to repair broken or malfunctioning building components and meet current building code requirements.

Proposed Action

The Proposed Action is NCPC's review and approval of exterior improvements to the Subject Property pursuant to Section 3 of the International Center Act of 1968, as amended.

Alternatives

Two alternatives were considered in the EA, including a No-Action Alternative and one Action Alternative (Alternative 1). The Action Alternative (Alternative 1) is identified as the preferred alternative and is the alternative on which NCPC is issuing this Finding of No Significant Impact. The alternatives are described in Chapter 2 of the EA and the selected alternative is summarized below.

Action Alternative (Alternative 1)

Under Alternative 1, the following exterior improvements would be made to the existing building on the Subject Property, which would allow the educational use approved by the Department, the Approved Use. Completion of the exterior improvements will result in the necessary replacement of certain building components that are in need of repair. In addition, the exterior improvements are critical to several of the upgrades being made to the building's mechanical, electrical, and plumbing (MEP) systems in order to achieve the programmatic needs and sustainability goals (LEED Silver) of the Approved Use:

- Replace entry doors at existing main building entrance on International Drive, NW, and at the existing Connecticut Avenue, NW and Tilden Street, NW entrances;
- Installation of approximately eight (8) new operable windows in staff apartments to meet current building code for units with cooking appliances;
- Replacement of glass block at egress stair towers to repair excessive glass block breakage and to remediate water infiltration;
- Installation of new rooftop mechanical units on Pods A, C, D, and L to meet current MEP codes;
- Installation of new metal panel screening around new rooftop mechanical units on Pods A, C, and D;
- Installation of new mechanical louvers in existing concrete base walls to meet current MEP codes;
- Installation of new atrium smoke evacuation system;
- Installation of new rooftop vertical exhaust ducts on Pods F and H, and near Stair 9; and
- Removal of existing exterior smoking shelter near the main building entrance on International Drive, NW.

Parking and Loading Needs

The parking and loading needs for the Whittle School were looked at in terms of Year One, Two Year (2020-2021), and Full Enrollment (2025-2026) at the Whittle School. The Year One Conditions (2019) will utilize the currently occupied portions of the building only. As such, the Year One Conditions are assumed to have negligible impact on parking and circulation.

Under Year Two Conditions (2020-2021), the proposed school is expected to have a total enrollment of 1,050 students from nursery level to 12th grade, with a boarding option for high school students. The Whittle School is anticipated to serve 150 students at the nursery level, 240 students at the elementary school level, 300 students at the middle school level, and 360 students at the high school level. Based on information provided by the school, it was assumed that 60 high school students will board at the school, and 990 students will travel to and from the

school daily. There will be approximately 149 school employees in teacher, staff, and leadership positions. Of these employees, 30 are expected to reside on campus.

Under Full Enrollment Conditions (2025-2026), the Whittle School is expected to have a total enrollment of 2,520 students from nursery level to 12th grade, with a boarding option for middle school and high school students. The school is anticipated to serve 360 students at the nursery level, 576 students at the elementary school level, 720 students at the middle school level, and 864 students at the high school level. Based on information provided by the school, it was assumed that 400 students (80 middle school students and 320 high school students) will board at the school, and 2,120 students will travel to and from the school daily. There will be approximately 279 school employees in teacher, staff, and leadership positions.

In an effort to achieve LEED compliance, the existing parking on-site will be reduced to a total of 230 parking spaces, located in varying lots and garages; thus the overall allocation of parking spaces was determined based on an iterative review and conversations with the Whittle School. The site must accommodate parking for faculty/staff parking, high school student parking, visitor parking, and pick-up/drop-off parking. It is expected that 130 faculty parking spaces and 45 high school parking spaces will be needed under Full Enrollment conditions.

Combined with the pick-up/drop-off spaces, this results in an overall parking demand of 215 parking spaces under Full Enrollment conditions. Given that the parking supply is not located in one central area, the parking spaces were allocated in order to accommodate the anticipated demand in the most advantageous location for each school level and parking type. These demand numbers will be sufficiently accommodated within the 230 on-site parking spaces, while providing an adequate amount of visitor parking.

Standard for Evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an EA is sufficient, and an Environmental Impact Statement need not be prepared if the EA supports the finding of no significant impacts. The EA for this project was prepared in accordance with this standard.

Potential Impacts

No significant impacts were identified that will require analysis in an Environmental Impact Statement. Alternative 1 will result in either beneficial or no impacts to the site, sound levels, off-street parking and circulation, historic and aesthetic resources; natural resources, and floodplain. The subject areas of potential impact are summarized below.

Site Impact:

The exterior improvements proposed under Alternative 1 would have no natural or environmental impact on the site or nearby surroundings. The proposed exterior improvements will not result in any ground disturbance or modify the envelope of the existing building. In addition, the exterior improvements will not have any impact on the existing open spaces and vegetation on the Subject Property that surround the existing building.

Sound Levels:

The District of Columbia limits weekday construction and demolition noise to 80 dBA from 7 am to 7 pm, unless granted a variance. The construction equipment that is anticipated to be used on-site under Alternative 1 is not expected to reach this noise level since no pile driving is required to construct the proposed exterior improvements. Construction noise levels would be expected to be within the District limits due to the type of construction, equipment required, and the planned time of day for construction. During the weekday, pedestrians, motorists, and cyclists in the vicinity may experience some construction-related noise, but the impacts are anticipated to be minimal. Short-term construction-related noise will be minimized by controlling noise at its source through implementation of appropriate best management practices, as necessary, to meet the District noise standards. In addition, as is being done for the interior improvements, any potential for noise-related impacts to existing building tenants, if any, will be mitigated through the coordination of exterior construction activities with existing tenants and tenant activities throughout the period construction.

Off-Street Parking and Circulation:

The exterior improvements proposed in Alternative 1 will not have any impact on the provision of off-street parking on the Subject Property, or to on-site circulation. None of the exterior improvements make any changes to existing garage parking, garage entrances, or on-site driveways and access aisles.

As part of the EA, a review of on-site parking and circulation was conducted by Gorove/Slade (the “Parking and Circulation Review”), which is attached as Exhibit A. The purpose of the review was to evaluate the overall parking demand and on-site circulation needs of the Approved Use in order to inform NCPC’s review of the provision of off-street parking under the Act.

As discussed in detail in the Parking and Circulation Review, vehicular access and circulation for the Approved Use utilizes the existing internal roadways and access points, as currently configured. Furthermore, the existing on-site parking supply, including parking spaces that are assigned by the Department to the Subject Property along International Drive, NW, can accommodate the parking needs of the Approved Use faculty, upper school students, pick-up/drop-off activity, and visitors. The proposed exterior improvements will not make any changes to the existing supply of off-street parking or existing internal roadways and access points on the Subject Property. As such, the existing parking and internal roadways and access 7 points will continue to be able to accommodate the parking and circulation needs of the Approved Use. As a result, no negative impacts to the provision of off-street parking and circulation are anticipated under Alternative 1.

Historic and Aesthetic Resources:

On April 25, 2018, the District of Columbia Historic Preservation Review Board (“HPRB”) voted to list the existing building on the Subject Property in the D.C. Inventory of Historic Site as an individual landmark, and to forward the historic nomination for listing in the National Register of Historic Places. The historic designation covers the exterior of the building as well as the site. According to the Historic Preservation Office (“HPO”) staff report on the historic nomination, the INTELSAT building is designated under District of Columbia Criterion D and National Register Criterion C for its architecture. The staff report stated that “the building’s rationality of

design, site placement, circulation, and materiality clearly reflect its embrace of modern aesthetics and construction techniques and clearly identifies its use as an important center for high-tech discovery and collaboration.”

In addition, HPO noted how the building was ahead of its time for “green” construction in the way that the building design incorporated energy efficiency, passive ventilation patterns in the atria, selective glass type and tinting, the use of sunshades, and early green roofing. The HPRB also designated the INTELSAT building under DC Criterion F as the work of a master, world-renowned architect John Andrews, who is well known for such other notable buildings as, among others, Scarborough College and the CN Towner in Toronto, and Gund Hall at Harvard. The building was also designated under DC Criterion A for events as the site of several landmark telecommunications achievements, and DC Criterion B for history as the home of the INTELSAT corporation, a consortium of countries dedicated to ensuring that satellite communication capabilities were equitably available to all countries, including developing nations.

Finally, although the building is not yet 50 years of age, the HPRB found the building met criteria consideration G for the National Register listing noting that the “building possesses exceptional historic and architectural significance for its role in developing the world’s capacity to communicate by phone, broadcast television, and internet. It is a rare example of exemplary modern architecture in D.C. and the work of a recognized master. Virtually no exterior changes have occurred to the building’s design, materials, and finishes, imparting a strong sense of integrity and an unquestionable ability to convey its significance.”

The exterior improvements proposed under Alternative 1 will not have any adverse effects on the historic building, as none of the improvements will alter any character defining feature that contribute to the building’s historic significance. Several of the exterior improvements entail the replacement, repair, and minor modifications of existing building components such as doors and windows that will not have any impact on the design of the building. The most substantial exterior improvements proposed are the installation of operable windows in staff apartments, the replacement of glass block on the egress stair towers, and the installation of new rooftop mechanical units and screening. To the extent these particular improvements will affect the building, such effects are likely to be minor in intensity. The installation of operable windows will be limited to only a small number of staff apartments, and the operable windows will not be visible on the exterior as they will be located behind the existing solar shade of the building.

The replacement of the glass block on the egress stair towers may have a visible impact given the age of, and coating used on the existing glass block. In addition, while the majority of the new glass block will have the same dimensions as what currently exists, a slightly smaller size glass block will be installed in limited locations in order to accommodate a slightly larger expansion joint that is necessary to prevent cracking, something that has occurred over time in the existing building. In addition, the width of the mortar joint for the new glass block may be slightly different than what current exists. Overall, the slight differences between the existing and new glass block will have a minor impact and not have an adverse effect on the historic building. In fact, the incorporation of a slightly larger expansion joint will have a beneficial impact as it will help prevent cracking of the glass block in the future.

The installation of new rooftop mechanical units and screening on Pods A, C, D, and L is necessary to meet current MEP codes and achieve sustainability goals (LEED). In order to minimize views of the new mechanical

units, new metal screening will be installed on Pods A, C, and D. The proposed screening will be composed of aluminum panels that match the metal panels of the existing building façade. The mechanical units and screening have been set back from the edge of the roof in order to minimize views from surrounding streets. In addition, the position of these particular Pods and the substantial mature tree canopy that exists on the Subject Property will further minimize views of the new mechanical units.

Overall, to the extent there are impacts from the proposed mechanical units on Pods A, C, D, and L, such impacts are likely to be minor as a result of the context-sensitive screening that will be installed, the substantial mature tree canopy on the Subject Property, and the considerable distance between the mechanical units and surrounding streets.

For purposes of Section 106, NCPC determined that the project would have a conditional no adverse effect on historic resources. While not subject to the EA, the conditional no adverse effect relates to the retention of the intact interior historic features and finishes of the south atrium and pods, including - but not limited to - the elevator tower and stairs, catwalks, terrazzo flooring, planters, etc. The District of Columbia State Historic Preservation Officer concurred with this determination in a letter dated May 17, 2019.

Natural Resources:

The Subject Property has substantial topography and contains an abundance of open space and mature tree canopy that surrounds the existing building. Most notably, the open space to the east of the existing building, known as Squirrel Park, is the largest open space on the Subject Property and is open to the public. There are no known wetlands or waterways on the Subject Property. Melvin C. Hazen Park is located to the south of the Subject Property across Tilden Street, NW. In addition, Soapstone Valley is located to the northeast of the Subject Property across Connecticut Avenue, NW. Soapstone Valley contains an open stream that flows eastward into Rock Creek.

The exterior improvements proposed in Alternative 1 would not have any impact on the natural resources that exist on the Subject Property, or that are in close proximity to the Subject Property. The exterior improvements will not require any land disturbance; and therefore, the topography, open spaces, and mature tree canopy will be maintained as is.

Floodplain:

The Subject Property is not located within the 100-year or 500-year floodplain. Furthermore, the exterior improvements proposed in Alternative 1 will not result in any alterations to the Subject Property's elevation, topography, or natural drainage characteristics. As such, no impacts to floodplains are anticipated.

A handwritten signature in black ink, appearing to read "Marcel Acosta", written over a horizontal line.

Marcel Acosta

Executive Director