

**Levy, David W.**

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**From:** Boswell, Carolyn [carolyn.boswell@va.gov]  
**Sent:** Monday, September 17, 2007 4:40 PM  
**To:** Levy, David W.  
**Subject:** Lafayette Perimeter Security EA Comments  
**Attachments:** Lafayette Building Perimeter Security Improvements (3).doc

<<Lafayette Building Perimeter Security Improvements (3).doc>>

Attached are VA's comments regarding the Lafayette Perimeter Security Environmental Assessment conducted by NCPD. Please let me know if you need further information.

Carolyn Boswell  
Director, Space and Renovations Service  
Department of Veterans Affairs  
(202) 461-5181

## Lafayette Building Perimeter Security Improvements

### NCPA Environmental Assessment (EA)

#### Comments of the VA Office of Security and Law Enforcement (OS&LE)

1. The Office of Security and Law Enforcement (OS&LE) within the Department of Veterans Affairs is the physical security program office for VA. One of our missions is the protection of the staff, contractors and visitors to our Washington, DC, Central Office buildings, which include the Lafayette Building. As VA is the primary Federal tenant there, OS&LE leadership serves as the Building Security Committee (BSC) Chair, and liaison with the Federal Protective Service. We have reviewed the Environmental Assessment (EA) produced by the National Capital Planning Commission and have the following general comments:
2. The perimeter security alternatives described in this EA mirror those which were developed by the Lafayette BSC when we met with the renovation project contractors. Generally, we concur with the need to provide a level of perimeter protection at the curb edge of the Lafayette Building.
3. Before anything is implemented, consideration of the perimeter security alternatives should be expanded to include 810 Vermont Ave, the VA Central Office (VACO) building. The two buildings face each other and share many of the same missions and functions. The security levels and primary threats are similar, and VA staff often moves between the two locations.
4. Our position is that any consideration of changes to the Lafayette Building perimeter need to be considered in the context of the VACO building. As indicated in the EA, hardening the Lafayette building target then exposes the VACO building as a softer target. In addition, from a visual aesthetic perspective, widening of the sidewalks around the Lafayette Building as well as adding bollards and other barriers will also affect the look and continuity of this entire block of Vermont Ave. We do understand that this project is being undertaken as part of the Lafayette modernization. However, the impacts on the VACO building are likely to be major and that needs to be taken into consideration before any final decisions are made.
5. OS&LE would be happy to meet with GSA, NCPA or any other interested parties to discuss these impacts. We appreciate the opportunity to review and comment on this EA.

**Levy, David W.**

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**From:** Marcus, Marjorie K.  
**Sent:** Thursday, September 27, 2007 9:58 AM  
**To:** Levy, David W.  
**Subject:** FW: COMMENTS RECEIVED ON ENVIRONMENTAL ASSESSMENT FOR PROPOSED PERIMETER SECURITY FOR THE LAFAYETTE BUILDING, WASHINGTON D.C.

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**From:** Boswell, Carolyn [mailto:carolyn.boswell@va.gov]  
**Sent:** Tuesday, September 25, 2007 2:05 PM  
**To:** Marcus, Marjorie K.  
**Cc:** alison.dresser@gsa.gov; Gentile, Bruce D; Frost, Keith  
**Subject:** RE: COMMENTS RECEIVED ON ENVIRONMENTAL ASSESSMENT FOR PROPOSED PERIMETER SECURITY FOR THE LAFAYETTE BUILDING, WASHINGTON D.C.

I would like to take this opportunity to clarify the comments VA submitted regarding the perimeter security for the Lafayette Building Modernization Project. VA whole heartedly supports the Modernization Project and we do not wish to impede the momentum of this construction project. It should be noted, however, that from the outset, VA believed that many of the security enhancements recommended by FPS for the perimeter of 811 Vermont Avenue were somewhat excessive and not necessarily warranted. Once the decision was made to go forward with the FPS recommendations, VA gave approval in order to keep the project moving. The comments provided by our Security office last week were made only to generate consideration as to what might be done to the VA Central Office building directly across the street so as to ensure compatibility with the surrounding city scape. VA wishes to see this project funded and moving - it is long overdue. Please let me know if you have any questions. Carolyn Boswell

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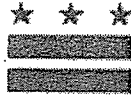
**From:** Marcus, Marjorie K. [mailto:marjorie.marcus@ncpc.gov]  
**Sent:** Wednesday, September 19, 2007 10:35 AM  
**To:** david.maloney@dc.gov; chris.shaheen@dc.gov; michael.mcgill@gsa.gov; rodney.moulden@gsa.gov; alison.dresser@gsa.gov; gary.porter@gsa.gov; tuebke@cfa.gov; Frederick.Lindstrom@cfa.gov; christopher.ziemann@dc.gov; donhawkins@comcast.net; Perry\_Wheelock@nps.gov; Schamel, Kathleen (CFM); Rebecca@dcpreservation.org; russell.shaffer@gsa.gov; beth.savage@gsa.gov; Boswell, Carolyn; paul.perez@exim.gov; kristi.tunstall@gsa.gov; habreu@achp.gov; len.weiser@gsa.gov; Witherell, Nancy; Levy, David W.; Keller, Eugene A.; Betsy Merritt; eriley@wmata.com; Schiffer, Lois J.; hans.wils@accor.com; jack.watt@accor.com; bob.perry@dmjmh.aecom.com; jlee@leeandpapa.com; mmologne@hillintl.com; christopher.reilly@hillintl.com  
**Subject:** COMMENTS RECEIVED ON ENVIRONMENTAL ASSESSMENT FOR PROPOSED PERIMETER SECURITY FOR THE LAFAYETTE BUILDING, WASHINGTON D.C.

Attached, we are sending the comments NCPC received in response to the EA for Perimeter Security for the Lafayette Building to the consulting parties.

Marjorie Marcus, RA, AICP  
Urban Design and Plan Review Division  
National Capital Planning Commission  
401 9<sup>th</sup> Street, NW, Suite 500 North  
Washington, D.C. 20004

(202) 482-7272 fax  
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Inquiries: (202) 482-7274

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF PLANNING



Mr. David Levy  
Acting Director, Urban Design and Plan review  
National Capital Planning Commission  
410 Ninth Street, NW, Suite 500

RE: Lafayette Building Perimeter Security

Dear Mr. Levy,

Please accept the following comments from the Office of Planning in response to the environmental assessment of the proposed security measures around the Lafayette Building. We are appreciative of the desire to enhance security at the Lafayette Building. However, our primary objection is the overwhelming impact of addressing those security matters largely in the public space. Accordingly, the Office of Planning strongly objects to both the build alternatives.

The site is located in the center of our downtown, on a busy active block, surrounded by private office, retail and hotel uses. Either build alternative would have an adverse effect on the public space, use of the public alley, pedestrian movement, historic resources, mature vegetation, traffic flow, land use, and utilities.

The Office of Planning opposes the placement of any obstruction in the public alley. The build alternatives with the impediments to an openly accessible alley would result in considerable adverse impacts on the loading and delivery activities to the adjacent privately-owned hotel and result in security activities being performed within the public space.

It is unclear how the proposed security check point would operate and the impacts of such a check point but OP opposes reducing the number of travel lanes and eliminating public parking lanes on any street for security purposes. Public on-street parking is rare in the downtown and it serves as a safety buffer between pedestrians and moving traffic.

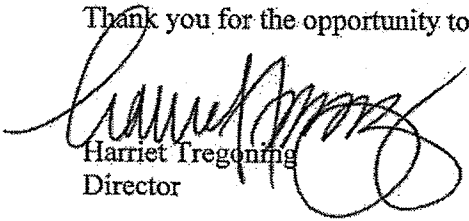
We also note that many of the proposed measures will require review and approval of the City's Public Space Committee. The Public Space Committee would review such proposed measures for consistency with the goals and objectives of the Comprehensive Plan which call for security measures not to "impede the District's commerce and vitality, excessively restrict or impede the use of public space or streets, or impact the

health of the existing landscape” as well as to “balance and mitigate security requirements against the daily mobility, efficiency, and quality of life concerns of District residents and visitors, and the potential for negative economic, environmental, and historic impacts.” Closure or restricted use of a public alley for private use must be approved by the District Department of Transportation.

The Office of Planning agrees with the executive summary conclusion that reads:  
“Furthermore, when the proposed project is considered with other security projects in the area, the cumulative effects of the proposed project with the bollards and other street security measures throughout the local area constitute an undesirable precedent. The security measures create impediments to pedestrian movement, detract from visual quality, and simply transfer threat risks to nearby properties.”

In conclusion, the Office of Planning opposes either build alternative but supports any effort to contain security within the building itself and is available to work with NCPC and GSA staffs to achieve this effort.

Thank you for the opportunity to comment.



Harriet Tregoning  
Director



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Rebecca A. Miller  
Executive Director

Erik M. Hein  
Program Coordinator

September 17, 2007

David Levy  
National Capital Planning Commission  
901 4<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20004

RE: Lafayette Building Perimeter Security Environmental Assessment  
Comments

Dear Mr. Levy,

Since September 11, 2001, the security of Government Buildings has been considered a high priority necessitating perimeter security programs in various configurations. To date, however, these programs have primarily been developed on government property with more space for implementation. These properties, by default, have been on lots with larger setbacks, more existing green space, or more obvious security needs and objectives. The Lafayette Building project, therefore, is one without direct precedent. As a contributing building in an intact streetscape with no open space between the building envelope and the sidewalk, and one without a clearly articulated specific security need, what ever is decided will likely have an impact upon countless numbers of future projects.

The Lafayette Building is located in one of Washington's most prestigious commercial areas. As a National Historic Landmark and a downtown property adjoining a hotel and contributing a historic district, it is an integral part of our city's streetscape. With numerous businesses, restaurants, parks, monuments and a Metro station all within the immediate vicinity, the pedestrian and vehicular traffic that surrounds and interacts with the building is significant.

Both alternatives A and B require significant use of public space. The placement of bollards, regardless of size, will create both a visual disruption to the streetscape and a barrier to pedestrian traffic. Despite the ability of pedestrians to navigate between bollards, their presence will markedly inhibit circulation. Further, both plans necessitate the removal of several public parking spaces and the establishment of truck queuing lines that could negatively impact a busy downtown area. Alternative B, although it provides for more commodious sidewalks and attractive vistas, would have the greater impact in this regard. However, the proposal of the seating area articulated by hardened terrace walls on the 15<sup>th</sup> Street elevation, given the width of the existing sidewalk and the presence of first-floor restaurants, does seem to be a favorable solution.

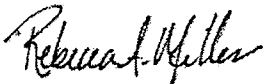
While many government perimeter security programs and needs seem obvious, such as those for the White House, the Capitol, etc., the Lafayette Building is, to our knowledge, an administrative office building. While GSA's "Decision Support Tool" must have taken into account certain risks in determining an appropriate program, these risks have not been adequately disclosed to those participating in this process. Therefore, we do not feel a strong case has been made to justify a program that would have such a precedent-setting impact upon the urban streetscape. Moreover, if an undisclosed specific element of the Lafayette Building's usage is the cause for the creation of this security program, perhaps a more appropriate solution would be to relocate this function to a more appropriate site rather than to force the site to accommodate an inappropriate function.

The DC Historic Preservation Office has expressed their opposition to alternatives A and B. Staff of the HPO commented that the City would not support perimeter security programs that would negatively impact public space. Further, it is their position that while the perimeter security program might protect the Lafayette Building, it will also displace the potential threat to surrounding buildings in the historic district.

In today's climate the argument could be made for increased security for countless numbers of buildings - not only in Washington, but across the United States. As such, what happens here not only will have an impact upon our streetscape, but upon streetscapes in many other communities. If we are to continue to have vibrant cities we must resist the temptation to "bunkerize" our buildings.

In conclusion, DCPL is sensitive to today's reality of balancing security with historic preservation, provided there is a clear need. However, we also discourage programs that negatively impact public space. In the case of the Lafayette Building we do not believe the need justifies the impact of either alternative A or B of the proposed perimeter security programs. We fear that with this lack of articulated need, a harmful precedent will be established that could encourage similar perimeter security programs nationwide. This would have a harmful effect not only upon historic resources, but upon urban life in general.

Thank you,



Rebecca Miller  
Executive Director





GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DISTRICT DEPARTMENT OF TRANSPORTATION



TRANSPORTATION PLANNING AND POLICY ADMINISTRATION

David Levy  
Senior Planner, Urban Design and Plan Review  
National Capital Planning Commission  
401 9th Street, NW  
Washington, DC 20004

Dear Mr. Levy,

Please consider the following comments as official comments from the District Department of Transportation (DDOT) to the Environmental Assessment for the Lafayette Building Perimeter Security Improvements.

- DDOT supports the effort to preserve existing street trees in Alternative A and opposes removing mature trees in order to widen the sidewalks for security purposes on Vermont Avenue, I Street, and H Street, NW in Alternative B. DDOT supports the planting of seven new street trees in Alternative A.
- DDOT opposes permanent security barriers such as bollards that obstruct the sidewalk. DDOT finds that such barriers significantly affect pedestrian traffic, and pose potential safety hazards to pedestrians such as tripping or running into them. Additionally, item IV (H) of the DDOT Public Space Security Policy states: "DDOT encourages security perimeters to be established within privately owned space or federal public space adjacent to buildings (i.e. not on sidewalks, curbs, gutters, streets or public alleys." In order to improve ADA accessibility, the sidewalk area must also be free of all obstacles, such as security barriers, street furniture and landscaping that interfere with the operation of special equipped vehicles, since this building services a large number of persons who have disabilities.
- DDOT opposes restricting the public alley on 15<sup>th</sup> St., NW for private use of the Lafayette building. This is an important loading access area for both the Lafayette Building and the Sofitel Hotel. In addition, DDOT must approve a public alley closing permit in order to perform this.
- DDOT opposes reducing the number of travel lanes and eliminating parking lanes on all streets for security purposes. Consequently, DDOT opposes eliminating parking spaces on H Street, NW (and designating H Street, NW as a "No Parking Tow Away Zone"), on 15<sup>th</sup> Street, NW, on Vermont Avenue, NW, and on I Street, NW (Alternative B) for security queuing areas, left-turn only lanes, and sidewalk extensions. On-street parking in downtown is rare and every effort must be made to preserve it. It also acts as a buffer between pedestrians and parked cars which improves the pedestrian environment. In addition, parking on both streets is rush-

hour restricted, and due to the high volume of traffic, removing these lanes would have a major impact on an already congested downtown.

- DDOT opposes the security screening process that instructs trucks to reverse on 15<sup>th</sup> St against the flow of traffic. This creates an unacceptable potential for accidents with vehicles south of H Street, NW who are traveling in the rush hour lane, with customers of the Sofitel Hotel who are using the drop-off layby, and with vehicles in the adjacent travel lane. DDOT also opposes the security screening process that allows trucks to double park on 15<sup>th</sup> Street while waiting for security screening. Double parking creates unacceptable bottlenecks that have major impacts on traffic congestion (as seen throughout downtown).
- DDOT opposes any security checkpoints in the public right of way. Please refer to item IV (H) of the DDOT Public Space Security Policy states: "DDOT encourages security perimeters to be established within privately owned space or federal public space adjacent to buildings (i.e. not on sidewalks, curbs, gutters, streets or public alleys."
- DDOT opposes widening the sidewalks on Vermont Avenue, NW in Alternative B. A majority of the service veterans, who are arriving for office appointments at these two buildings, arrive in special equipped vehicles for the usages of wheelchairs. Vehicles equipped for the usage of wheelchairs require universal minimum 11-foot wide parking spaces when parking on a 60 degree angle, plus additional striped 5 to 8 foot wide aisles adjacent to these vehicles, equipped with handicap ramps. When parking is parallel to the curb of the street, the automatic lift and/or manual ramps must extend at least eight feet into the sidewalk on a 90-degree angle from the side or rear doors of the vehicle. Traffic safety requires a least 12 parking spaces be provided on both sides of the Vermont Avenue for these disabled service veterans.
- Any alteration must comply with the Americans with Disabilities Act, including perpendicular wheelchair ramps at intersections and unobstructed sidewalks.

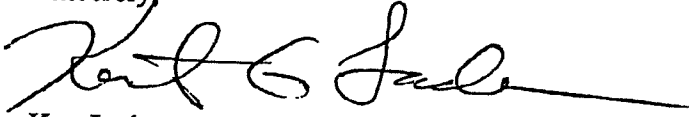
In addition, we recommend the following changes in language:

1. Page 3-23 Bike racks are to be the square hoops approximately 36" in height
2. Page 3-24 should be noted that DDOT also grants public space applications which are necessary for any construction and security measures outside of private property.
3. Pages 4-12, 4-13 change "DDOT has serious concerns about ..." to "DDOT opposes..."

DDOT offers these comments solely in response to the Environmental Assessment public comment period. These comments in no way reflect DDOT's final recommendations, nor do they preclude the direct review by DDOT for the use of public space.

If you have any questions, please feel free to contact me at 671-2309 or  
ken.laden@dc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Laden", with a long horizontal flourish extending to the right.

Ken Laden  
Associate Director