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# **1800 F STREET, NW FEDERAL OFFICE BUILDING MODERNIZATION**

**WASHINGTON, DC**

## **ENVIRONMENTAL ASSESSMENT**

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**U.S. GENERAL SERVICES ADMINISTRATION**

IN COOPERATION WITH THE  
**NATIONAL CAPITAL PLANNING COMMISSION**

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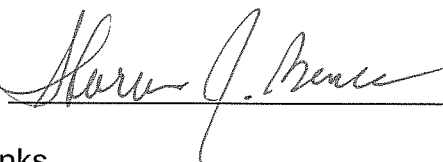
**MAY 2010**

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**FINDING OF NO SIGNIFICANT IMPACT  
FOR MODERNIZATION OF  
1800 F STREET, NW  
WASHINGTON, DC**

**FINDING**

In accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), U.S. General Services Administration (GSA) Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide, I find that the proposed modernization of the federal building at 1800 F Street, NW, as described in the attached Environmental Assessment (EA), is not a major Federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) will not be prepared.

APPROVED:  \_\_\_\_\_

Date: 5/24/2010

Sharon J. Banks,  
Acting Regional Administrator  
U.S. General Services Administration  
National Capital Region

*This FONSI will become final 30 days after publication of its Notice of Availability in the Washington Post, provided that no information leading to a contrary finding is received or comes to light during the 30-day review period.*

## **BASIS FOR FINDING**

GSA prepared an environmental assessment (EA) analyzing the environmental impacts that could result from modernization of the federal building at 1800 F Street, NW in Washington, DC. The EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), GSA Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide. The EA documents the direct, indirect, and cumulative impacts for two action alternatives and a No Action alternative.

The environmental issues addressed in the EA were identified through early public involvement (scoping), which included consultations with Federal and local agencies and other stakeholders. The Final EA responds to comments and concerns received during the 30-day scoping period and stakeholder meetings. The Final EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

## **I. PURPOSE OF AND NEED FOR THE PROPOSED ACTION**

The purpose of the proposed action is to increase and improve the efficiency of 1800 F Street, NW (the Building) while maintaining its historical integrity. The proposed action is needed because the Building is commercially substandard. Building systems are outdated, and the existing building circulation promotes operational inefficiencies.

## **II. DESCRIPTION OF ALTERNATIVES**

Three alternatives were considered in this EA, two action alternatives and a No Action alternative. These alternatives are described in the EA, and are summarized below.

**No Action Alternative:** Under the No Action Alternative, the building systems would continue to degrade, and the Building would remain commercially substandard. No internal or external building modernization or infill construction would occur. Therefore, there would be no additional tenants and associated parking demand, no improvements to building (tenant) circulation, and no changes to visual and historic resources. Courtyards and their structures would remain unchanged. The Building's interior would not be modernized. Perimeter security elements would not be installed.

**Alternative A:** Alternative A would involve a modernization of the Building including: (1) demolition, removal, and disposal of existing interior systems; (2) façade improvements (3) renewal of the Building's physical plant including green building and energy conservation features; (4) construction of an additional 120,000 gross square feet (gsf) of building space within the Building's open space courtyards; (5) changes to the building access and egress to include an ADA accessible entrance on the south side; and (6) perimeter security improvements.

**Alternative B:** Alternative B includes all the elements described under Alternative A with the following changes:

- No perimeter security elements, except for the existing retractable bollards at the courtyard entrances.
- Retail additions on the south (E Street) side of the Building. These retail spaces would extend out from the face of the building into public space but will be designed to be demountable within 24 hours.
- The south lobby entrance would be lowered four to six feet to be at-grade, and the demountable retail addition would be constructed at-grade, therefore ADA ramps would no longer be necessary to enter the building at these locations. The entrances at the southeast and southwest corners of the building would be maintained in their existing conditions to preserve historic fabric.
- Modifications to the interior of the building on the south side to enhance the Building for both Federal employees and visitors. This would include making the cafeteria on the second floor accessible to the public with steps and an elevator.

### **III. PREFERRED ALTERNATIVE**

GSA has identified Alternative B as the preferred alternative. While both Alternative A and B meet the overall purpose and need of the proposed action, Alternative B would provide public access to the building without perimeter security elements. The introduction of retail along E Street, NW would create an activated streetscape that is welcoming, inviting, and open. Retail would also attract additional visitors to the area, generate revenue from sales tax and tenant leases, and create employment opportunities.

The retail addition would provide GSA with the opportunity to comply with goals stated in a number of federal policies and guidelines including, but not limited to, the *Public Buildings Cooperative Use Act of 1976*, *Comprehensive Plan for the National Capital: Federal Elements* (2004), the *National Capital Framework Plan* (2008), and GSA's *Achieving Great Federal Spaces: A Property Manager's Guide*.

### **IV. ENVIRONMENTAL CONSEQUENCES**

The following is a summary of the impacts associated with implementing Alternative A or B. A full description of these impacts and recommended mitigation measures can be found in the Final EA:

### Summary of Potential Impacts of the Action Alternatives

<b>Affected Resources</b>	<b>Alternative A</b>	<b>Alternative B</b>
Land Use	Negligible impact	Beneficial impact
Planning Controls and Policies	Minor long-term adverse impacts	Minor long-term adverse impacts
Public Space	Moderate long-term adverse impact <i>(Will obtain a public space permit to use portion of land controlled by the District of Columbia. As part of that process, GSA has initiated discussions with DDOT)</i>	Moderate long-term adverse impact <i>(Will obtain a public space permit to use portion of land controlled by the District of Columbia. As part of that process, GSA has initiated discussions with DDOT)</i>
Economics	Negligible impact	Beneficial impact
Historic Resources <i>(see Section V)</i>	Moderate long-term adverse impact - mitigation required <i>(see Section V)</i>	Moderate long-term adverse impact- mitigation required <i>(see Section V)</i>
Visual Resources	Minor long-term adverse impacts	Moderate long-term adverse impacts
Vehicular Circulation	Minor short-term and long-term adverse impacts	Minor short-term and long-term adverse impacts
Transit and Pedestrian/Bicycle Circulation	Minor short-term and moderate long-term adverse impacts; beneficial long-term impacts to building circulation	Minor short-term and long-term adverse impacts; beneficial long-term impacts to building circulation
Air Quality	Minor short-term adverse impacts	Minor short-term adverse impacts
Noise	Minor short-term adverse impacts	Minor short-term adverse impacts
Vegetation	Minor short-term adverse impacts	Minor short-term adverse impacts
Storm Water	Beneficial long-term impact	Beneficial long-term impact
Hazardous Materials	Beneficial long-term impact	Beneficial long-term impact

## **V. SECTION 106 of the NATIONAL HISTORIC PRESERVATION ACT**

Pursuant to Section 106 of the National Historic Preservation Act (NHPA), federal agencies are required to consider the effects of any undertakings on districts, sites, buildings, structures, or objects included, or eligible for inclusion, in the National Register of Historic Places (NRHP). Federal agencies are also required to afford the Advisory Council on Historic Preservation (ACHP) a “reasonable opportunity to comment with regard to such undertaking.” The Building is listed in the NRHP. The Building is also within the boundary of streets and adjacent to other features that contribute to the L’Enfant Plan, a resource listed in the NRHP.

Through the coordinated NEPA and Section 106 processes, GSA has determined that the implementation of Alternative A or Alternative B would have an adverse effect, as defined by *36 CFR Part 800: Protection of Historic Properties*, on the building and the L’Enfant Plan. Adverse effects to 1800 F Street, NW and the L’Enfant Plan will be avoided or minimized through the design and consultation process. In compliance with *36 CFR Part 800: Protection of Historic Properties*, GSA submitted the design to the DC State Historic Preservation Office and received concurrence on the finding. The ACHP commented on the undertaking. A Memorandum of Agreement (MOA) was signed by GSA, the State Historic Preservation Officer (SHPO), and ACHP in December 2007.

Since 2007, options were added to the scope of work for the proposed action. These options include, addition of retail space on E Street, the installation of roof top photo voltaic panels and the in kind replacement of the original window sash. GSA has consulted with the SHPO and ACHP regarding these proposed options. An amendment to the December 2007 MOA will be executed and signed by GSA and the consulting parties. GSA shall ensure that the measures outlined in the MOA are carried out to minimize, mitigate and avoid adverse effects on the Building and the L’Enfant Plan.

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# **1800 F STREET, NW FEDERAL OFFICE BUILDING MODERNIZATION**

## **ENVIRONMENTAL ASSESSMENT**

Responsible Agency:  
**U.S. General Services Administration**  
Cooperating Agency:  
**National Capital Planning Commission**

### **Abstract:**

The U.S. General Services Administration (GSA), in cooperation with National Capital Planning Commission (NCPC), has prepared this Environmental Assessment (EA) for the modernization of the Federal Office Building at 1800 F Street, NW, which is an historic building in the District of Columbia that is occupied primarily by GSA. The modernization project includes upgrading building systems and internal circulation to improve workplace and system operational efficiencies. This EA considers the environmental effects of implementing the No Action (no build) alternative and two action alternatives to modernize the Federal Building at 1800 F Street, NW.

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**Acronym List**

ABAAS	Architectural Barriers Act Accessibility Standard
ACHP	Advisory Council on Historic Preservation
AOC	Architect of the Capitol
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ANC	Advisory Neighborhood Commission
APhA	American Pharmacists Association
APE	Area of Potential Effect
ARRA	American Reinvestment and Recovery Act
ASHRAE	American Society of Heating, Refrigeration, and Air Conditioning Engineers
CAA	Clean Air Act
CBD	Central Business District
CEQ	Council on Environmental Quality
CFA	Commission of Fine Arts
CFR	Code of Federal Regulations
CSO	combined sewer overflows
Db	decibels
dBA	A-weighted decibels
DC	District of Columbia
DCOP	DC Office of Planning
DCPL	DC Preservation League
DHS	Department of Homeland Security
DOI	Department of the Interior
DOT	Department of Transportation
DPW	DC Department of Public Works
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FHA	Federal Highway Administration
FOB 8	Federal Office Building 8
GSA	U.S. General Services Administration
gsf	gross square feet
GWU	George Washington University
HPRB	Historic Preservation Review Board
HVAC	heating, ventilation, and air-conditioning
IAQ	indoor air quality
ISC	Interagency Security Committee

LEED	Leadership in Energy & Environmental Design
MOA	Memorandum of Agreement
NAAQS	National Ambient Air Quality Standards
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NOx	oxides of nitrogen
NRHP	National Register of Historic Places
PM	particulate matter
sf	square feet
SHPO	State Historic Preservation Office
SPCC	Spill Prevention, Control, and Countermeasures
USGS	US Geological Survey
VOC	volatile organic compounds
WMATA	Washington Metropolitan Area Transit Authority

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## **1.0**

# **PURPOSE OF AND NEED FOR PROPOSED ACTION**

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## **1.0 PURPOSE OF AND NEED FOR PROPOSED ACTION**

### **1.1 Introduction**

The General Services Administration (GSA) proposes to modernize the Federal Building at 1800 F Street, NW (the Building) in Washington, DC (see Figure 1-1). The Building is situated on a single parcel bounded by E, F, 18th, and 19th Streets, NW. The Building is an E-shaped structure, nine-stories-high including a basement and ground floor, and totals approximately 764,000 gross square feet (gsf) of space, of which 517,000 square feet (sf) are usable. The Building's E-shaped configuration encloses two paved open-air courtyards. The Building currently houses approximately 2,300 GSA Headquarters employees performing office functions. GSA has prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508(1896)], the National Historic Preservation Act (NHPA) of 1966, as amended, and GSA's Public Buildings Service *NEPA Desk Guide*. GSA is the lead agency responsible for the preparation of the EA. The National Capital Planning Commission (NCPC) has participated in the preparation of the EA as a cooperating agency in accordance with 40 CFR Section 1501.6.

The study area for identifying potential environmental impacts is generally within a one-half mile radius of the Building; however, the study area may expand or contract for each resource discipline, depending upon the potential for a specific impact to affect a given geographic area.

## 1.2 Purpose of and Need for the Proposed Action

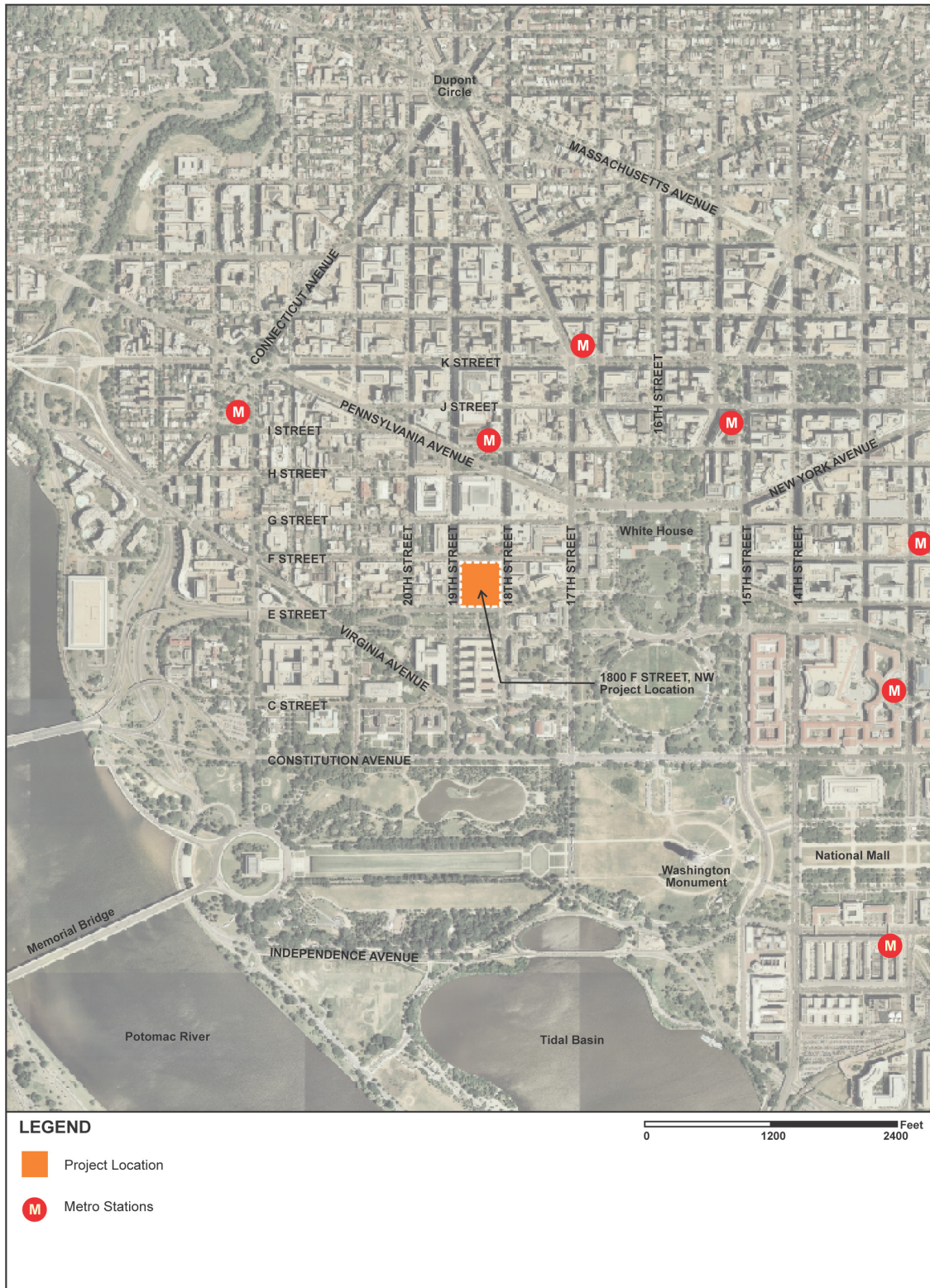
The purpose of the proposed action is to increase and improve the efficiency of the Building while maintaining its historical integrity.

The proposed action is needed because the Building is commercially substandard. Building systems are outdated, and the existing building circulation promotes operational inefficiencies.

The objectives of this modernization are:

- to provide a high-quality office facility that features appropriate architectural design elements and current engineering concepts;
- to provide a structure that meets the Interagency Security Committee (ISC) Security Design Criteria;
- to replace all engineering systems including: heating, ventilation, and air-conditioning (HVAC), air-handling equipment, electrical systems, plumbing systems, fire and life-safety systems, voice data systems, and security systems that result in a high performance green building;
- to improve space efficiency by redesigning the Building's circulation and utilizing an open-plan office concept to provide office space for an additional 500 more GSA employees ;
- to provide the infrastructure for high-performance workplace applications that focus on the needs of the individual worker to achieve organizational flexibility, technological adaptability, and environmental sustainability in a safe and economical manner;
- to increase the economic efficiency of the Building (reduce operating costs);
- to provide indoor air quality (IAQ) that meets or exceeds current IAQ standards set by the Environmental Protection Agency and the American Society of Heating, Refrigeration, and Air Conditioning Engineers;
- to bring the Building into full compliance with the Uniform Federal Accessibility Standards, the Architectural Barriers Act Accessibility Standard (ABAAS), and the Americans with Disabilities Act (ADA) per codes in effect at the time of design;
- to maintain the historical significance of the Building;
- to maximize smart building applications to improve building operations and tenant satisfaction; and
- to refurbish the Building's historic exterior stonework and either refurbish or replace the existing windows.

Figure 1-1: Site Location Aerial Photograph



Source: AECOM, 2010

### **1.3 Background**

The Federal Building at 1800 F Street, NW was constructed in 1917, with the seventh floor addition constructed in 1934. The Building housed the Department of the Interior (DOI) until 1949, when GSA was founded and began occupying the Building. Constructed prior to the advent of air-conditioning, the Building contains narrow wings with a central corridor designed to provide natural ventilation and daylight to the office spaces. The wings are approximately 48 feet wide with an eight-foot wide corridor down the center, and office space approximately 20 feet wide on each side. Typical bays are 13 feet by 15 feet, and 14 feet by 19 feet, which are smaller than modern office spaces.

The E-shaped building is connected by a seven-story head building along F Street, which allows continuous pedestrian movement throughout the Building. Due to the site topography, the ground floor level is at the street level along E Street, and the first level is at the street level along F Street. The two courtyards (east and west) are formed by the arms of the “E”. The East courtyard contains the auditorium building and the service/trash removal building, and the West courtyard contains the library building and the receiving and loading dock building. Limited employee parking (139 spaces) is provided in the courtyards.

### **1.4 Public Involvement and Agency Coordination**

#### **1.4.1 Public and Agency Participation**

The public participation process for this EA was initiated by the circulation of a public information package to interested citizens and agencies on August 30, 2004. The package defined the proposed action of the project, identified GSA’s purpose, need, and objectives for the project, and provided alternatives to achieve the proposed action. The package stated GSA’s intent to prepare an EA, described the environmental review process, and indicated where comments on the scope of the EA should be sent. The public scoping package was sent to the following governmental and public agencies and organizations:

- National Capital Planning Commission (NCPC);
- National Park Service (NPS);
- The Commission of Fine Arts (CFA);
- Council on Environmental Quality (CEQ);
- Environmental Protection Agency (EPA);
- Department of Homeland Security (DHS);
- Department of the Interior (DOI);
- General Services Administration (GSA);
- Advisory Council on Historic Preservation (ACHP);
- Architect of the Capitol (AOC);
- Federal Highway Administration (FHA);
- Washington Metropolitan Area Transit Authority (WMATA);
- Mayor of the District of Columbia;
- Council of the District of Columbia;
- DC Office of Planning (DCOP);
- DC Historic Preservation Review Board (HPRB);

- DC State Historic Preservation Office (DC SHPO);
- DC Division of Transportation (DDOT);
- DC Department of Public Works (DC DPW);
- DC Environmental Health Administration;
- DC Fire Marshall;
- DC Advisory Neighborhood Commission (ANC) 2A;
- DC Preservation League (DCPL);
- National Trust for Historic Preservation; and
- Committee of 100 on the Federal City.

In the 2004-2008 timeframe, various governmental and public agencies and organizations were consulted to obtain information and solicit input on the proposed action and affected resource areas. In spring 2010, additional scoping meetings were held with review agencies when the project was re-started after a delay due to project funding.

Comments received through the public scoping process and on-going consultation with stakeholders were taken into consideration in the development of this EA.

A Draft EA was provided to key stakeholders for review, including NCPC, DCOP, and DDOT. The Final EA and Finding of No Significant Impact (FONSI) were released to the public on May 28, 2010. The organizations, agencies, and individuals listed on the notification list in the Appendix have been notified by mail of the availability of the EA. A Notice of Availability was also placed in the *Washington Post* and *Washington Times* on May 28, 2010. Further, the 1800 F Street EA has been posted on NCPC's website and copies of the EA are available for review at: the offices of the National Capital Planning Commission at 401 Ninth Street, NW, North Tower, Suite 500, Washington, DC; U.S. General Services Administration National Capital Region at 301 Seventh Street, NW Suite 7600, Washington, DC; the Martin Luther King, Jr. Memorial Library, 901 G Street, NW, Washington, DC; and West End Branch Library, 1101 24<sup>th</sup> Street, NW, Washington, DC.

Comments on the FONSI and Final EA must be submitted during the 30-day public comment period. The review period for the FONSI and Final EA concludes on June 28, 2010 and written comments must be postmarked by this date. Comments should be mailed, emailed, or faxed to:

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### **1.4.2 Historic Preservation Consultation**

In conjunction with the preparation of this EA, GSA has conducted a review of the project's potential effects on historic properties consistent with Section 106 of the NHPA. GSA initiated the Section 106 consultation process with the DC SHPO, and conducted consultation meetings with DC SHPO, the ACHP, and other interested agencies and public organizations. GSA initially met with the DC SHPO on November 15, 2004. The DC SHPO identified that the proposed project would potentially have an adverse effect on historic resources. Subsequent design meetings with GSA and the DC SHPO were held over a two-year period to resolve adverse effects. Issues of concern identified during the early Section 106 process included the effects of the proposed project on the interior corridors, the Building's southern towers, building access on the southern side, and the historic character of the Building. A Memorandum of Agreement (MOA) was prepared that identified measures to avoid, minimize or mitigate adverse effects on historic properties. The MOA was signed by GSA, DC SHPO and ACHP on December 19, 2007.

At the time the MOA was signed in 2007, GSA was considering a single action alternative. Since that time, GSA has proposed modifications to the original proposed action, and expanded their analysis to include a second action alternative that differs in several key design features. In May 2010, GSA reinitiated the Section 106 consultation process with the DC SHPO and other interested agencies to amend the 2007 MOA. GSA shall ensure that the measures outlined in the 2007 MOA and the 2010 amendment are carried out to minimize, mitigate and avoid adverse effects on historic resources.



## 1.5 Environmental Issues Considered

This EA has been prepared to evaluate the potential impacts that the proposed building modernization would have on a range of natural and man-made resources. Based on project scoping, these include the following resource areas:

- Socio-economic resources (land use, planning controls & policies, public space, and economics)
- Cultural resources (historic and visual resources)
- Transportation (vehicular, transit and pedestrian/bicycle circulation)
- Physical and biological resources (air quality, noise levels, vegetation, storm water management and hazardous materials)

Several issues were considered but after further analysis were eliminated from detailed study because the proposed action would cause negligible or no impact on these resources. These include the following:

### Archeological Resources

Due to the fact that ground disturbing activities would be restricted to the building yard, an area that was previously disturbed due to the construction of the Building, it is unlikely that intact archaeological resources would be encountered. Thus, this resource has been dismissed from detailed study in this EA.

### Demographics, Housing and Environmental Justice

The building modernization would not impact the demographics and housing of the area since the modernization would not include a residential component. Also, there are no low-income or minority residential neighborhoods in the vicinity of the building site so there would be no environmental justice impacts.

### Water Resources

Due to the absence of surface water on the site, and the fact that there would be no increase in impervious surfaces, impacts to water resources are anticipated to be negligible.

### Climate Change

While the renovations to the building would result in an increase of approximately 500 employees at the facility, it is anticipated that the majority of these workers would access the building by Metro due to its central location. Thus, the renovation and operation of the Building would likely only have a negligible impact on climate change or greenhouse gas emissions. In addition, proposed energy conservation and green technologies included in the building modernization would improve the Building's impact on local energy systems.

### Wildlife

There is no existing sensitive wildlife at the project site that would be disturbed, and any urban species temporarily affected by construction would be expected to return to the site once construction is completed.

### Geology, Topography, and Soils

The Building construction would not encounter site geology, alter topography, or greatly impact soils. Minimal soil excavation would be required for infill foundation construction.

### Utilities

The addition of 500 employees would have a negligible effect on water, sewer, power and solid waste demands of the Building since sufficient urban systems are readily available to support the new construction and additional employees once occupied. Furthermore, the goal of the improved energy conservation measures added to the project is to result in lower consumption of water, sewer and power needs on the local systems from current consumption.

## **2.0**

# **DESCRIPTION OF ALTERNATIVES**

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## 2.0 DESCRIPTION OF ALTERNATIVES

### 2.1 Introduction

This section describes the proposed alternatives for the modernization and expansion of office space at the Federal Building at 1800 F Street, NW. The three alternatives assessed in this EA include:

- No Action Alternative: the Building would not be modernized and the building infill would not be constructed in the courtyard;
- Alternative A: the Building would be modernized, infill would be constructed in the courtyard, and perimeter security features would be constructed in the building yard; and
- Alternative B (Preferred Alternative): the Building would be modernized, infill constructed in the courtyard, and retail space added to the south (E Street) side of the building (no perimeter security features are included except at the courtyard entrances).

### 2.2 No Action Alternative

Under the No Action Alternative, the building systems would continue to degrade and the Building would remain commercially substandard. No internal or external building modernization or infill construction would occur. Therefore, there would be no additional tenants, no improvements to building (tenant) circulation, and no changes to visual and historic resources. Courtyards and their structures would remain unchanged. The Building's interior would not be modernized. Perimeter security elements would not be installed and the Building would not meet identified security requirements.

**Figure 2-1: Existing 1800 F Street NW Federal Building**



*Source: Shalom Baranes Associates, 2010*

### 2.3 Alternative A - Building Modernization, Infill and Perimeter Security

Alternative A would involve a modernization of the Building including: (1) demolition, removal, and disposal of existing interior systems; (2) renewal of the Building's physical plant including green building and energy conservation features; (3) construction of an additional 120,000 gross square feet (gsf) of building space within the Building's open space courtyards (see Figure 2-2); (4) changes to the building access and egress to include an ADA accessible entrance on the south side; (5) exterior stone and fenestration renovations; and (6) perimeter security improvements.

**Figure 2-2: Simulated View of 1800 F Street Building under Alternative A**



*Source: Shalom Baranes Associates, 2010*

#### Demolition of Building Interior Systems

Under Alternative A, potential demolition, removal, and disposal of building materials and systems may include mechanical systems, electrical systems, telecommunication systems, security systems, fire alarm systems, and sprinkler systems. Common spaces such as restrooms and elevators would also be improved and hazardous materials such as asbestos-containing materials, lead-based paint, and PCB-containing light ballasts would be removed.

Historic materials would be preserved, salvaged, and stored during demolition, and re-installed to the extent practicable during interior restoration.

#### Demolition within Courtyards

Under Alternative A, the courtyards would be improved. The two smaller structures in the center of the courtyards would be demolished and their services relocated, to provide space for the proposed infill. The existing buildings that would be demolished are (1) the former Press room building currently providing receiving and building support in the east courtyard and (2) the

former Cooling Tower in the west courtyard added in the 1934 building upgrade. These two buildings would provide a total of approximately 31,000 gsf of useable space within the courtyard. The auditorium would remain in its current location in the east courtyard. The library building in the west courtyard is no longer required as a library use and would be redesigned to house alternative uses including the child care center.

A limited number of parking spaces would remain in the courtyards. Of the 139 existing parking spaces, 54 would be maintained. The existing parking spaces would be reconfigured based on the location of the building demolition in the courtyard and the proposed infill to be constructed in the courtyard.

### Exterior Stone and Window Restoration

Under Alternative A, potential exterior stone and window restoration includes:

- Temporary access scaffolding;
- Removal and disposal of some of the windows for energy conservation. All windows would have lead-based paint removed (see alternate below);
- Removal of all window-unit air conditioners;
- Abatement and disposal of asbestos-containing caulk, lead-based paint from door frames and wood doors, and avian excreta;
- Temporary protection and security of window and door openings;
- Cleaning and repair of exterior stone surfaces;
- Repair of the cast iron frames;
- Preparation and painting of all wood window sash and frames, and cast iron frames (see alternate below);
- Installation of sheet metal and drip edges at the cornices, bird deterrents, new doors and entrances, and mechanical louvers with security bars;
- Recondition/repair of existing historic doors and frames including new hardware and security devices; and
- Installation of new doors where required by the ADA or building codes.

The historic window treatment has undergone additional study by GSA. Under Alternative A, the modernization project includes restoration of all existing windows, frames and ornaments; retention of the existing single glazing; installation of fixed interior blast and single-glazed storm windows at the street sides of the Building and fixed interior single-glazed thermal windows at the courtyard sides of the Building. An alternate is also included under Alternative A that calls for replacing the existing window sashes with new, operable wood sashes, replicating the historic windows, glazed with insulating laminated glass. The selection of which window treatment to construct would be determined by GSA in consultation with DC SHPO during the building design process.

### Building Interior Renewal

Under Alternative A, potential interior renewal includes:

- Protection of the historic building fabric;
- Installation of new architectural finishes, partitions, and fitting equipment;

- Cleaning, repair, and reinstallation of existing salvaged architectural finishes, fittings, and equipment;
- Cleaning, paint removal, and pointing and pinning of existing stone columns, bases, and lintels;
- Installation of new food service;
- Modification of roofs and roof structure, and structural systems;
- Abatement of hazardous materials including asbestos-containing materials and lead-based paint;
- Installation of a new mechanical system including boilers, chillers, cooling towers, air handling units, fan coil units, and associated pumps, duct work and piping;
- Installation of ADA-accessible restrooms, electrical system, telecommunication system, fire alarm system, security system, elevators, and entrances;
- Construction on the street side including structural, architectural and landscape modifications; and
- Construction of two new exits to accommodate relocated fire exit stairs.

Entry to the Building would continue to be located on the first floor of the north side of the Building (F Street). This is the functionally and historically appropriate access and security configuration for the lobby, and provides ready access to the main common use areas of the Building, including the former library and auditorium. The lobby is an historic space to be retained and restored. An ADA-accessible, controlled building entrance would be added at the existing doors of the south end of the Building's center wing. This second entrance would serve as an additional main entrance to the Building. GSA is reviewing options that would make the Building's amenities more accessible to the general public, and this entrance has the potential for becoming a main entrance for the public.

Elevators and stairs would be reconfigured to provide 14 passenger elevators and one service elevator, and six egress stairs. With the addition of the expanded entrance on the south side of the Building, entry to the Building would be more evenly distributed between the north and south sides when compared to the current configuration.

The first floor corridor would be replicated and restored. The corridors on the second through fifth floors would be retained and restored at the head house (north wing) and for up to five bays south in each wing, with the option to continue them further if required. The corridors of the sixth floor would be retained and restored with the original double-loaded office configuration.

### Building Infill Construction

Infill in the two courtyards would connect the end of the Building's wings, above and adjacent to the north face of the south wing. The infill would convert the current dead-end wing configuration into a more efficient and usable continuous circulation pattern above the third floor of the Building. Program/office space of approximately 120,000 gsf would be provided at the east and west corridor from Level 1 to 7, and at the west corridor from Level G to Level 7.



### Green Building Features

The latest revisions to the Building modernization project have incorporated a number of High Performance Green Building (HPGB) initiatives with the goal of achieving a minimum of Gold Leadership in Energy and Environmental Design (LEED) rating for the Building. These include:

- Replacement of windows with new operable windows with laminated-insulated glazing (as an alternate to refurbishment of the existing windows, as described above);
- Internal shading devices;
- Increased wall and roof insulation;
- Improved atrium glass, sunscreens, natural ventilation, radiant floors and other energy-conserving features;
- Photovoltaic and solar collectors for energy production and hot-water heating;
- HVAC, plumbing and building system upgrades incorporating energy conservation features;
- Monitoring systems to reduce building energy use, monitor indoor air quality and improve human comfort; and
- Greywater reuse, rain/storm water capturing and condensate collection systems to reduce water consumption.

### Security Requirements

The Interagency Security Committee (ISC) guidelines were used to determine level of security required at the Building. Security requirements for the Building are for medium-level blast protection, requiring the south facades to be blast-resistant curtain walls. The windows at the historic facades facing the street would be restored and provided with internal blast windows (an alternate to this treatment is to replace the windows with new operable window sashes and laminated glazing, as discussed above). The windows facing the courtyard would not require replacement for blast protection. Where the new construction infill abuts the Building, exterior facades (including windows and masonry) would be removed to allow circulation between existing and new areas.

Perimeter security features would be located within the existing building yard with the exception of three entry points, two on E Street and one on 18th Street, NW (Figure 2-4). At these entry points, existing utilities and other constraints necessitate a different placement of the bollards. Perimeter security around the majority of the building would be achieved through 30" high hardened planter walls and 36" high bollards located at the edges of the existing landscaped yards adjacent to the building. The bollards would all be the same size (8 inches) and spacing (4 feet and 6 1/2 inches) and designed to be in keeping with the other black cast iron at the Building, and there would be no connecting rails between the bollards. At the existing stairs at five major entry points, where access to the Building is needed, the bollards would provide the perimeter barrier and would be located inside the sidewalk and in line with the low planter walls.

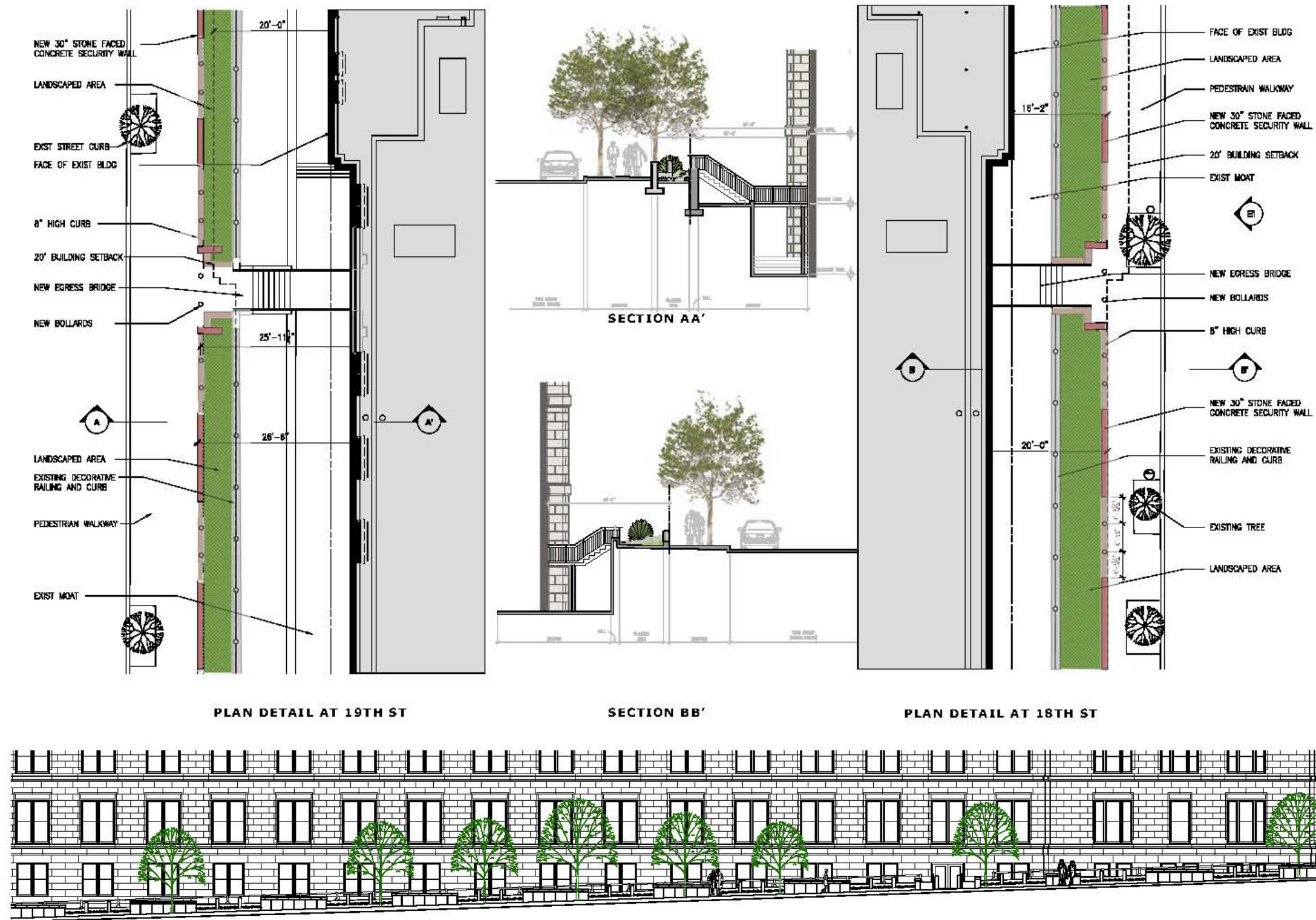
At the building entrances along E Street, NW, and the southwest corner of the Building on 18<sup>th</sup> Street, NW, the bollards are pulled away from the line formed by the planter walls, since the entry stairs extend past these walls. In these locations, they are placed in the sidewalk which is

approximately twelve feet wide along both streets between the security walls and street curb. Setback distance of bollards was chosen based on the location of existing utilities and the goal of minimizing impacts on surrounding sidewalks. The bollards in these locations would be stainless steel to match the new doors and handrails on the Building. At the courtyard vehicular entrances, retractable bollards are used in line with the perimeter security walls and bollards surrounding the Building, in addition to the existing retractable bollards located at both entrances. The location of security features is illustrated in Figures 2-3 and 2-4.

#### Landscape Treatment

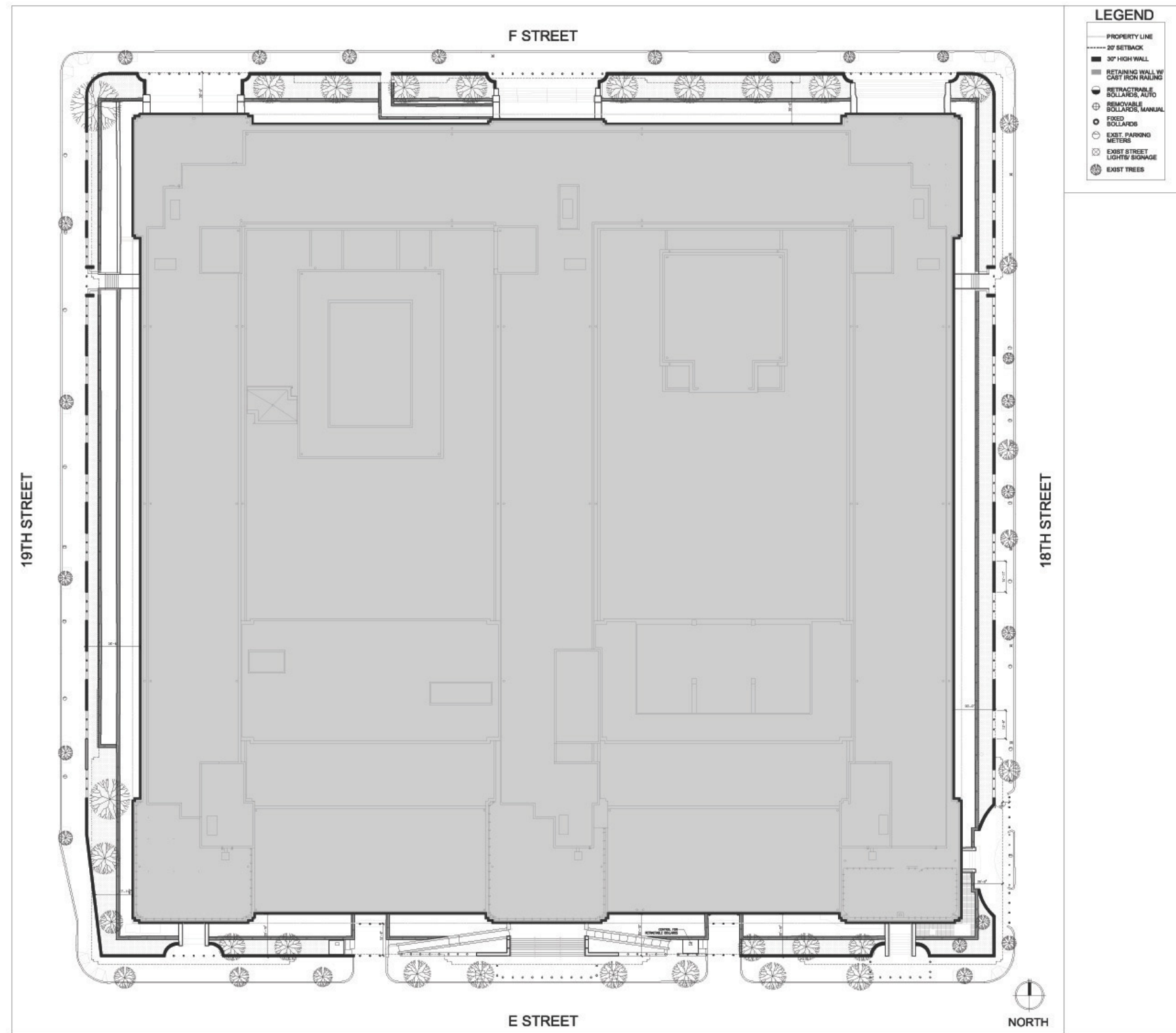
Construction of the exterior modernization and perimeter security features would disrupt the existing landscaping in the sideyards. The larger holly trees in the sideyards would be prepared for removal, relocated during construction and replanted. The existing specimen tree in the northwest corner of the landscaped yard would be retained. The existing ground cover and shrubs in the sideyards would be replaced with native plant material suitable for the Washington, DC urban street environment. The street trees surrounding the Building at the edge of the sidewalks would be retained and are not expected to be affected by construction.

Figure 2-3: Alternative A Exterior Security Details



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Figure 2-4: Alternative A Placement and Identification of Security Features



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## 2.4 Alternative B (Preferred Alternative) - Building Modernization, Infill and Retail Addition

Alternative B includes all the elements described under Alternative A with the following changes:

- GSA is currently considering a change in the security requirements for the Building for a lower blast protection level. This action is in compliance with the criteria outlined in the April 2010 Interagency Security Committee Standards. While this change is under consideration, the exterior hardscape provided by the bollards and security walls has been provided as an option for the construction contract. The exterior windows are also being evaluated with an option to provide replacement sashes with laminated-insulated glass in lieu of the contract refurbished sashes with interior blast windows. If GSA decides to change the security requirements for the building, no perimeter security elements - except for the existing retractable bollards at the courtyard entrance - would be present at the site.
- This alternative would not include the ADA ramp and stairs at the building entrance on the south side of the Building. The south lobby entrance would be lowered four to six feet to be at-grade, and the retail addition entrances would be constructed at-grade; therefore, ADA ramps would not be necessary to enter the Building. The entrances at the southeast and southwest corners of the Building would be maintained in their existing conditions to preserve the Building's historic fabric.
- Retail additions on the south (E Street, NW) side of the Building. These retail spaces would extend out eight to ten feet from the building face. The building face is the property line for the building. The retail additions would be freestanding, metal and glass structures designed to be demountable within 24 hours to meet the District of Columbia's regulations for structures within District-controlled public space along the street. They would have folding glass walls and storefront entrances and modular, panelized roof structures. The existing areaway would be bridged by an extension of the sidewalk paving to provide floors. The existing guard booths would be relocated and integrated with the retail additions. The retail spaces would have at-grade entrances, be open to the public and could involve sidewalk café tables for outdoor eating. A market study is currently being performed to determine the viability of retail at this location, in addition to other parameters or conditions associated with this type of use which should be included in the building design.
- Modifications to the interior of the building on the south side to enhance the Building for both Federal employees and visitors. This may include making the cafeteria on the second floor accessible to the public with steps and an elevator.

**Figure 2-5: Simulated Views of 1800 F Street Building under Alternative B (with the demountable retail addition building massing shown in red)**



*Source: Shalom Baranes Associates, 2010*

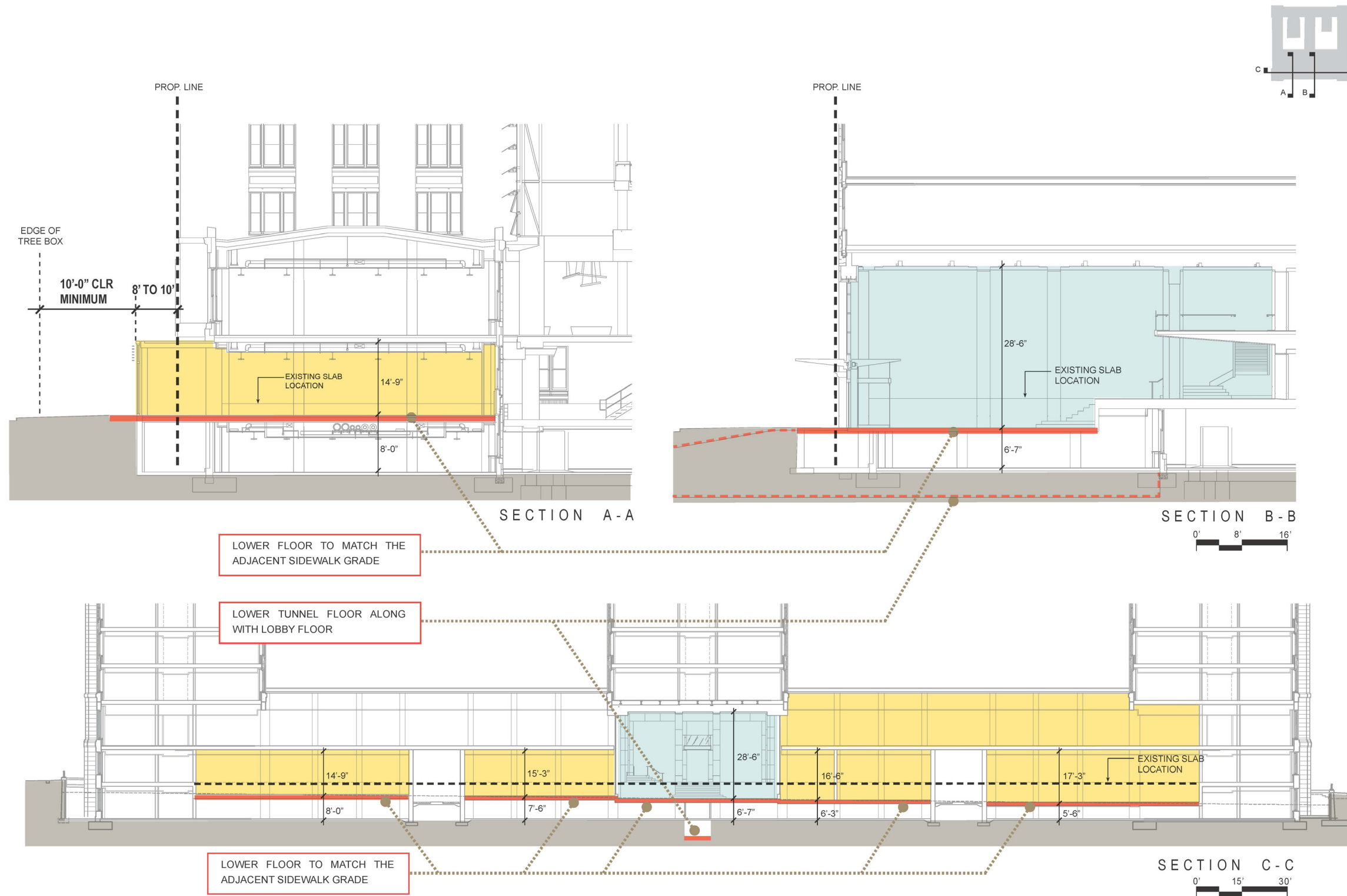


Figure 2-6 Alternative B Floor Plans



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Figure 2-7 Alternative B Cross-Sections



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## **2.5 Alternative Eliminated from Detailed Study**

As part of the plans to modernize the Building, another alternative was considered during the design process. This alternative included modernizing the building interior without the addition of building infill in the courtyard area. However, modernizing the Building without the addition of building infill would not correct the circulation inefficiencies that currently exist due to the E-shaped configuration. Therefore, modernization without building infill was eliminated from further consideration.

## **2.6 Summary of Potential Environmental Impacts**

Chapter 3 of this EA describes the environment that would potentially be affected by the identified alternatives, and Chapter 4 provides a detailed assessment of the potential impacts including mitigation measures to minimize these impacts. Table 2-1 provides a summary of potential impacts.

## **2.7 Selection of Preferred Alternative**

GSA has identified Alternative B as the Preferred Alternative. While both Alternatives A and B meet the overall purpose and need of the proposed action, Alternative B would provide public access to the building without perimeter security elements. The introduction of retail along E Street, NW, would create an activated streetscape that is welcoming, inviting, and open. Retail would also attract additional visitors to the area, generate revenue from sales tax and tenant leases, and create employment opportunities.

The retail addition would provide GSA with the opportunity to comply with goals stated in a number of federal policies and guidelines including, but not limited to, the *Public Buildings Cooperative Use Act of 1976*; *Comprehensive Plan for the National Capital: Federal Elements* (2004); *National Capital Framework Plan* (2008); and GSA's *Achieving Great Federal Spaces: A Property Manager's Guide*.

**Table 2-1: Summary of Potential Impacts of the Alternatives**

<b>Affected Resources</b>	<b>No Action Alternative</b>	<b>Alternative A</b>	<b>Alternative B (Preferred Alternative)</b>
<b>Land Use</b>	Negligible impact	Negligible impact	Beneficial impact
<b>Planning Controls and Policies</b>	Moderate long-term adverse impact	Minor long-term adverse impacts	Minor long-term adverse impacts
<b>Public Space</b>	Negligible impact	Moderate long-term adverse impact – <i>Will obtain a Public Space Permit to use portion of land controlled by the District of Columbia. As part of that process, GSA has initiated discussions with DDOT.</i>	Moderate long-term adverse impact– <i>Will obtain a Public Space Permit to use portion of land controlled by the District of Columbia. As part of that process, GSA has initiated discussions with DDOT.</i>
<b>Economics</b>	Negligible impact	Negligible impact	Beneficial impact
<b>Historic Resources</b>	Negligible impact	Moderate long-term adverse impact - <i>mitigation required (MOA)</i>	Moderate long-term adverse impact- <i>mitigation required (MOA)</i>
<b>Visual Resources</b>	Negligible impact	Minor long-term adverse impacts	Moderate long-term adverse impacts
<b>Vehicular Circulation</b>	Negligible impact	Minor short-term and long-term adverse impacts	Minor short-term and long-term adverse impacts
<b>Transit and Pedestrian/Bicycle Circulation</b>	Negligible impact	Minor short-term and moderate long-term adverse impacts; beneficial long-term impacts to building circulation	Minor short-term and long-term adverse impacts; beneficial long-term impacts to building circulation
<b>Air Quality</b>	Negligible impact	Minor short-term adverse impacts	Minor short-term adverse impacts
<b>Noise</b>	Negligible impact	Minor short-term adverse impacts	Minor short-term adverse impacts
<b>Vegetation</b>	Negligible impact	Minor short-term adverse impacts	Minor short-term adverse impacts
<b>Storm Water</b>	Negligible impact	Beneficial long-term impact	Beneficial long-term impact
<b>Hazardous Materials</b>	Negligible impact	Beneficial long-term impact	Beneficial long-term impact

## **3.0**

# **AFFECTED ENVIRONMENT**

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### **3.0 AFFECTED ENVIRONMENT**

#### **3.1 Socio-Economic Resources**

##### **3.1.1 Land Use**

The 1800 F Street Federal Building is located within the Northwest quadrant of downtown Washington, DC. The Building occupies a full city block and is bounded by 18th Street to the east, 19th Street to the west, F Street to the north, and E Street to the south. The Building was originally constructed in 1917 for the Department of Interior and now serves as GSA's headquarters and central office building.

The area surrounding the 1800 F Street Federal Building is largely occupied by mid-rise office and institutional buildings. The General Secretariat of the Organization of American States, Young Americas Business Trust and DACOR Bacon House buildings are sited directly north of 1800 F Street. East of the Building is the American Institute of Architecture and the Octagon Museum, housing the American Architectural Foundation and site of the oldest architecture museum in the country. Several buildings owned by George Washington University are sited west of the 1800 F Street site. These buildings include the Elliott School of International Affairs, George Washington Career Center, the Alumni House, and the Thurston, Mitchell, and 1959 E Street residence halls. To the south, between 1800 F Street and the Department of Interior Building, is Rawlins Park. Rawlins Park is a small rectangular open space that serves as a memorial to Major General John A. Rawlins, an advisor to General Ulysses S. Grant. Because of its historical significance, Rawlins Park was added to the National Register of Historic Places in 1977.

The E Street Expressway is a one-mile long conduit that runs along the southern boundary of the Building, serving both westbound and eastbound traffic. The westbound portion of the Expressway terminates at 21st Street NW and connects to Virginia Avenue NW and Interstate 66. The eastern portion of the Expressway begins at 20th Street NW, the southern boundary of Rawlins Park, and continues to 17th Street, NW, near the White House, Eisenhower Executive Office Building, and the Corcoran Gallery of Art. The Farragut West Station Metrorail Station is located within a ½ mile from the site, at the intersection of 17th and I Streets, NW. In addition, several parking structures are located within the vicinity of the 1800 F Street site.

##### **3.1.2 Planning Controls & Policies**

###### Zoning

As a federally-owned property, the Building is not subject to DC zoning regulations. Instead, new design and renovation projects on federal property are under the purview of NCPC, pursuant to the District of Columbia Zoning Enabling Act of 1938 (ch. 534, 52 Stat. 802 and DC ST § 6-641.15). In accordance with the Act, NCPC has approval authority for use, open space, height, and bulk for projects on federal property.

The area within a one-block radius of the Building contains varying zoning designations. Directly south is the Department of Interior, which, similar to GSA's Headquarters at 1800 F Street, is exempt from DC zoning regulations. The area north of the 1800 F Street site is zoned Commercial, C-3-C. This zoning designation permits medium/high density business and

employment centers, including office, retail, housing, and mixed uses to a maximum lot occupancy of 100%, a maximum Floor Area Ratio (FAR) of 6.5 for residential and for other permitted uses, and a maximum height of 90 feet.

Directly west of the 1800 F Street site, the area is zoned Residential, R-5-E. R-5-E permits high density development of general residential uses, including single-family dwellings, flats, and apartment buildings, to a maximum lot occupancy of 75%, a maximum FAR of 6.0 for apartment houses and hotels, and 5.0 for other structures, and a maximum height of 90 feet. This area, and the blocks northwest of the site, is owned by the George Washington University.

The area east of the Building is zoned as a special district, SP-2. The SP-2 zoning designation allows for medium-to high-density development including residential uses and permits by special exceptions offices for non-profit organizations, trade associations, and professional societies. The maximum lot occupancy for this zone is 80% for residential use, a maximum FAR of 6.0 for residential and 3.5 for other permitted uses, and a maximum height of 90 feet. In November of 2009, the Zoning Commission of the District of Columbia approved a text amendment to the SP-2 designation that allows for certain types of retail and service uses by special exception. The location of these uses would be limited to the groundfloor or below and pertains only to those SP-2 districts south of M Street, NW and NE. Prior to the text amendment, establishing retail and/or service uses in a SP-2 District required a use variance.

#### 1910 Height of Buildings Act

The *Height of Buildings Act* was passed in 1910 to preserve the horizontal character of the National Capital through the regulation of building heights throughout Washington, DC. The Act regulates the scale of buildings and establishes a maximum building height controlled by street width. The maximum allowable building height is to be proportionate to the width of the adjacent street, limited in residential areas to 90 feet and in business areas to the width of the street plus 20 feet. In addition, there is a general height limit of 130 feet, with 160 feet allowed along certain portions of Pennsylvania Avenue.

#### 1870 Parking Act & 1871 Building Projection Act

The 1791 Plan of the City of Washington, designed by Pierre Charles L'Enfant, defined the physical and symbolic character of the capital city, and envisioned a coordinated system of radiating avenues, vistas, and parks. In support of the Plan, Congress passed the Parking Act in 1870 and the Building Projection Act in 1871. The legislative intent of the Parking Act was to allow private use of the land between buildings and sidewalks, as long as the area was maintained as greenspace for the enjoyment of the community. The Building Projection Act allowed for bay windows, corner towers, and porches to project into public space, giving developers greater freedom to introduce various architectural elements into the city, such as the Queen Anne, Romanesque Revival, Italianate, and other Victorian-era styles.

#### Comprehensive Plan for the National Capital: Federal Elements (2004)

The *Comprehensive Plan for the National Capital: Federal Elements* is the principal planning tool used by NCPC to guide the development of federal facilities in Washington, DC. The Plan is comprised of goals, objectives, and policies intended to guide growth and development in the Nation's Capital. The Federal Workplace, Preservation and Historic Features, Environment,

Transportation, and Visitor Elements are of particular relevance to the proposed modernization project at 1800 F Street.

The Federal Workplace Element states that it is the goal of the federal government in the National Capital Region to: “Locate the federal workforce to enhance the efficiency, productivity, and public image of the federal government; to strengthen the economic well-being and expand employment opportunities of the region and the localities therein; and to give emphasis to the District of Columbia as the seat of the national government.” The following policies are potentially relevant to the 1800 F Street modernization:

- Maintain and reinforce the preeminence of the monumental core by attracting and retaining federal employment through modernizing, repairing, and rehabilitating existing federal workplaces in the monumental core.
- Utilize available federally owned land or space before purchasing or leasing additional land or building space. Agencies should continuously monitor utilization rates of land and building space to ensure their efficient use.
- Consider the modernization, repair, and rehabilitation of existing federally owned facilities for federal workplaces before developing new facilities.
- Plan federal workplaces to be compatible with the character of the surrounding properties and community and, where feasible, to advance local planning objectives such as neighborhood revitalization.
- Consider combined public and private mixed uses at federal workplaces where security requirements will not be compromised.
  - Lease or share space in workplaces for publicly accessible commercial, cultural, educational, civic, recreational, residential, and other high-traffic use activities where these uses will fulfill a local need or support local development objectives.
  - Coordinate the use of federal workplaces for public and private activities with the local community to ensure that the community is not negatively impacted, including through the loss of local tax revenue resulting from the relocation of a business from private space to a federally owned space.
- Locate publicly accessible activities within federal workplaces on public streets and other pedestrian access levels, as well as within courtyards and on rooftops.
- Provide and maintain space for activities that encourage public access to and stimulate public pedestrian traffic around, into, and through federal facilities.
  - Shops, restaurants, exhibits, residential, and other public activities that stimulate pedestrian street life surrounding facilities in urban areas should be considered.
- Encourage the use of federal workplaces for occasional cultural, educational, and/or recreational activities, providing suitable space and equipment for such activities.
- Use appropriate commemoration and exhibits at federal workplaces
  - Exhibits are encouraged in widely used areas such as lobbies and corridors.
- Develop sites and buildings consistent with local agencies’ zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent feasible.

- Use innovative energy conserving techniques in the design and construction, operation, location, and orientation of federal workplaces.
- Implement methods to reduce consumption of non-renewable energy resources and to reduce the consumption of energy through energy efficient techniques as soon as practicable at all federal workplaces or when planning these facilities.
- Encourage federal employees to rideshare, including the use of carpools, vanpools, privately leased buses, public transportation, and other multi-occupant modes of travel.
- 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.
- All perimeter security improvements that are intended to be in place for more than 60 days shall be submitted to NCPC for review and/or approval.
- When building new construction and when making improvements to existing buildings, integrate security threat counter measures, such as building hardening and blast-resistant glazing, into the physical design of the structure and the site to minimize the impact of perimeter building security on the public realm.
- Incorporate security needs into the design of buildings, streetscapes, and landscapes using urban design principles in a manner that:
  - enhances and beautifies the public realm, resulting in coherent and welcoming streetscapes.
  - does not excessively restrict or impede operational use of sidewalks or pedestrian, handicap, and vehicular mobility; and
  - does not impact the health of existing mature trees.
- Design projects in a manner that does not impede commerce and economic vitality but balances the need for perimeter security with the need to enhance and maintain the viability of urban areas.
- Design security barrier lines and elements that complement and enhance the character of the area in which they will be located and that respect the historic context of the area when applicable.
- Design security barriers and checkpoints at vehicular entry points on federal installations to accommodate vehicular queuing on site and to avoid adverse effects on adjacent public roadway operations and safety

The Preservation and Historic Features Element states that it is the goal of the federal government to: “Preserve and enhance the image and identity of the nation’s capital and region through design and development that is respectful of the guiding principles of the L’Enfant and McMillan Plans, the enduring value of historic buildings and places, and the symbolic character of the capital’s setting.” Policies in support of this goal that are applicable to the 1800 F Street modernization project include the following:

- Protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital’s image.
- Promote continuity in the historic design framework of the nation’s capital by protecting and enhancing the elements, views, and principles of the L’Enfant Plan.

- 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.
- Ensure that new construction is compatible with the qualities and character of historic buildings and their settings, in accordance with the Secretary of the Interior’s *Standards for the Treatment of Historic Properties* and *The Guidelines for Rehabilitating Historic Buildings*.
- Recognize that historic federal properties are sometimes important for local history and ensure that locally significant characteristics or qualities are maintained.
- Protect the skyline formed by the region’s natural features, particularly the topographic bowl around central Washington, as well as historically significant built features, from intrusions such as antenna towers, water towers, and rooftop equipment.
- Construct building facades to the street right-of-way lines (building lines) to reinforce the spatial definition of the historic street plan.

The Federal Environment Element states that the goal of the federal government is to: “Conduct its activities and manage its property in a manner that promotes the National Capital Region as a leader in environmental stewardship and preserves, protects, and enhances the quality of the region’s natural resources, providing a setting that benefits the local community, provides a model for the country, and is worthy of the nation’s capital.”

Policies in support of this goal that are applicable to the 1800 F Street modernization project include the following:

- Utilize non-polluting sources of energy (e.g., solar energy).
- Encourage the development and use of alternative energy sources to reduce the reliance on fossil fuels.
- Require wastewater reduction through conservation and reuse in all new federal buildings and major federal renovation projects.
- Promote water conservation programs and the use of new water-saving technologies that conserve and monitor water consumption in all federal facilities.
- Encourage the use of innovative and environmentally friendly “Best Management Practices” in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface.

The Transportation Element states that it is the goal of the federal government to: “Develop and maintain a multi-modal regional transportation system that meets the travel needs of residents, workers, and visitors, while improving regional mobility and air quality through expanded transportation alternatives and transit-oriented development.” The Parking Ratios policies within this Element are particularly applicable to the 1800 F Street modernization project, as they encourage federal agencies to promote alternative modes of transportation, including transit, carpools, and vanpools in order to reduce demand on the region’s limited transportation infrastructure capacity. The policy applicable to the 1800 F Street modernization project is as follows:

- Within the Central Employment Area, the parking ratio should not exceed one space for every five employees.

The Visitor Element states that it is the goal of the federal government to: “Accommodate visitors in a way that ensures an enjoyable and educational experience, showcases the institutions of American culture and democracy, and supports federal and regional planning goals.” The policies applicable to the 1800 F Street modernization project are:

- Support publicly accessible federal visitor attractions on federal property throughout the region.
- Encourage exhibits and other educational activities and events in lobbies and public areas of government buildings to inspire and educate visitors about the role of government.
- Continue to support food and retail vendor services at designated locations, while addressing any adverse visual impact to nearby attractions, and any impacts to pedestrian and vehicular accessibility.
- Balance the needs of security with visitor accessibility by ensuring that federal visitor attractions in the National Capital Region provide for the safety of visitors while remaining accessible and aesthetically pleasing, following the recommendations in *The National Capital Urban Design and Security Plan*.

#### Comprehensive Plan for the National Capital: District Elements (2006)

The *Comprehensive Plan for the National Capital: District Elements* contain thirteen city-wide elements that provide goals, objectives, and policies for development within the city. There are also ten area elements which provide guidance specific to geographic areas of the city, and one implementation element. Policies that are applicable to the 1800 F Street Federal Building modernization project come from the Environmental Protection, Historic Preservation, Urban Design, and Central Washington Elements. These include the following:

- Policy E-2.2.1: Energy Efficiency - Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees.
- Policy E-2.2.4: Alternative Energy Sources - Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality.
- Policy E-2.2.6: Energy Efficiency at Major Employment Centers - Continue efforts that enable major employers in the city, including the government, institutions, schools, and the private sector to implement energy conservation measures.
- Policy E-3.1.3: Green Engineering - Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated.
- Policy E-3.2.1: Support for Green Building - Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities.

- Policy E-5.1.3: Environmentally Friendly Government Operations - Promote energy efficient and environmentally friendly District government operations, including the purchase of recycled and recyclable products, procurement of “green power” for District operations where feasible, the use of energy saving equipment, and contracting practices which include incentives for sustainable technology
- Policy E-5.1.4: Sustainable Landscaping - Encourage landscaping practices on District properties that reduce the need for watering and mowing, control the spread of invasive species, increase the use of landscaping for stormwater management, and reduce the use of pesticides and herbicides
- Policy HP-2.4.1: Rehabilitation of Historic Structures - Promote appropriate preservation of historic buildings through an effective design review process. Apply design guidelines without stifling creativity, and strive for an appropriate balance between restoration and adaptation as suitable for the particular historic environment.
- Policy UD-3.2.3: Site Planning and Design Measures to Increase Security - Encourage architectural design and site planning methods that minimize perimeter security requirements and have a reduced impact on the public realm. Such measures include separating entryways, controlling access, “hardening” of shared walls, and the selection of more resilient building materials.

Policy CW – 1.2.2 provides guidance regarding the historic resources within Central Washington. It states:

- Policy CW-1.2.2: Preservation of Central Washington’s Historic Resources - Protect and enhance Central Washington’s historic resources by continuing the current practices of:
  - Preserving the area’s historic buildings and districts;
  - Requiring that renovation and new construction is sensitive to the character of historic buildings and districts;
  - Applying design incentives and requirements to encourage preservation, adaptive reuse, and appropriate relationships between historic development and new construction;
  - Encouraging the adaptive reuse of historic and architecturally significant buildings; and
  - Preserving the original L’Enfant Plan pattern of streets and alleys, especially alleys that provide for off-street loading, deliveries, and garage access.

National Capital Urban Design and Security Plan (2002) and Urban Design and Security Plan Policies and Objectives (2005)

The *National Capital Urban Design and Security Plan*, adopted by NCPC in 2002, seeks to balance the security needs and requirements of federal agencies with the need to protect the historic urban fabric of Washington's Monumental Core. According to the Plan, security elements for federal buildings should be achieved in a manner that does not compromise the aesthetic qualities and functioning of the public realm, be it pedestrian circulation, vehicular mobility, commerce, or the aesthetic experience of visitors. The Plan’s goals are as follows:

- Provide appropriate levels of perimeter security for sensitive buildings and their occupants against threats generated by unauthorized vehicles approaching or entering them.
- Provide security in the context of a city-wide program of streetscape enhancement and public realm beautification, rather than as a separate or redundant system of components whose only purpose is security.
- Expand the palette of elements that can gracefully provide perimeter standoff security, avoiding the monotony of endless lines of jersey barriers or bollards, which only invoke defensiveness.
- Produce a coherent strategy for deploying specific families of streetscape and security elements in which priority is given to achieving aesthetic continuity along streets, and within areas, rather than solutions selected solely by the needs of a particular building under the jurisdiction of one public agency.
- Provide perimeter security in a manner that does not impede the City's commerce and vitality, pedestrian or vehicular mobility, or operational use of sidewalks within the Monumental Core or downtown.

In order to achieve these goals, the Plan offers a variety of design elements that can be used in perimeter security projects. These solutions include such physical elements as “hardened” or fortified street furniture, planters, and fences, low stone plinth walls, bollards, large round linear planters with seating, bicycle racks, and curbside hedges with embedded security measures. Potential security measures should be designed to be applied in a variety of different contexts and ways to meet the specific security and design needs of each particular downtown area.

The *Urban Design and Security Plan Policies and Objectives* was adopted in 2005 to clarify issues related to contextual design, vehicular and pedestrian controls, and the placement and design of physical security elements. The objectives and policies are intended to be used to guide federal agencies when evaluating, planning, and designing proposed perimeter security projects.

The policies and objectives include the following:

- Strike a balance between physical perimeter security for federal buildings and the vitality of the public realm.
- Encourage a multi-faceted approach to selection of appropriate security measures that considers intelligence information, operational and procedural measures (such as surveillance and screening), and design strategies (such as structural engineering, window glazing, emergency egress, and physical perimeter barriers).
- Intelligence information, operational controls, and physical design measures should be used to protect against vehicle-borne explosives.
- The placement of physical security barriers in public space is discouraged and should be minimized.
- For existing buildings in urban areas, perimeter security barriers should be located within the building yard when the face of the sensitive building to the outside edge of the building yard is a minimum of 20 feet. If the distance from the face of the building to the outside edge of the building yard is less than 20 feet, then perimeter security barriers may be permitted in public space adjacent to the building.



- Perimeter security barriers at intersections, corners and near crosswalks or other highly used pedestrian areas should be minimized; barriers that are needed should be located to allow safe pedestrian waiting areas and pedestrian movement.
- The design of security barriers, including their mass, form and materials should respond to the architectural and landscape context in which they are located and complement and aesthetically enhance the special character of the associated building and precinct.
- Perimeter security barriers in public space should incorporate decorative tree wells, planters, light poles, signage, benches, parking meters, trash receptacles and other elements and public amenities typically found in a streetscape.

### National Capital Framework Plan (2008)

The *National Capital Framework Plan*, released in the summer of 2008, is the result of a joint planning effort between NCPC and the Commission of Fine Arts (CFA). The Plan serves as a tool to guide strategic decisions to coordinate federal and local interests, identifying opportunities to coordinate land use, urban design, and transportation improvements. The principal goals of the Plan are to: plan for the future needs of the federal government, including space for new memorials, museums, public gathering spaces, and federal offices in a way that contributes to sustainable city life; preserve the historic open space of the National Mall and protect it from overbuilding; and extend the special civic qualities of the National Mall and the vitality and vibrancy of the city into the adjacent federal precincts.

In order to accomplish these goals, the Plan identifies four major precincts adjacent to the National Mall which are to be the focus for future cultural attractions and government offices. The four precincts are: the Northwest Rectangle, Federal Triangle, the Southwest Rectangle, and East Potomac Park. The Framework Plan examines opportunities to enhance these precincts in order to meet the future needs of the federal government, while also protecting the city's open space and public realm.

As identified within the Plan, the Northwest Rectangle precinct generally stretches from F Street to the north, Constitution Avenue to the south, the Potomac to the west, and 17th Street to the east. The 1800 F Street Federal Building is located at the east end of this area. The central goal of the Plan is to strengthen the link between the precinct's civic and cultural features, creating an accessible, walkable high quality destination and workplace.

Specific strategies to achieve this objective include:

- Creating a new ceremonial boulevard between the Kennedy Center and the Lincoln Memorial;
- Reclaiming the E Street corridor as an urban parkway to connect the Kennedy Center, the White House, and President's Park;
- Establishing a new public park on Virginia Avenue between 19th and 22nd Streets, NW;
- Decking the Potomac Freeway to accommodate new parks and buildings; and
- Realigning the Theodore Roosevelt Bridge to enhance the public space along the shoreline.

### DC Department of Transportation Design and Engineering Manual

The DDOT *Design and Engineering Manual* establishes standards for sidewalks and tree boxes that are relevant to the detailed design of the proposed project. In particular, the document provides guidance on sidewalk widths under differing conditions, and guidance on the size and spacing of street trees.

### Tree Removal Permit

The Urban Forestry Administration, under the District Department of Transportation (DDOT), requires permits for the removal of street trees. Specifically, the Urban Forest Preservation Act of 2002, effective June 12, 2003 (D.C. Law 14-309; D.C. Official Code 8-6501.01 et seq.), established an urban forest preservation program requiring a Special Tree Removal Permit prior to the removal of a tree with a circumference of 55 inches or more. If a tree removal permit is approved, the Urban Forestry Administration will require the replacement of lost trees based on caliper, either on the site or in a comparable area.

### George Washington University Campus Plan

The George Washington University is a private, coeducational research university located two blocks west of the project site. The University was chartered by the 1821 and includes 44 acres of land. The campus is generally bounded by 19<sup>th</sup> Street to the east, 24<sup>th</sup> Street to the west, Pennsylvania Avenue to the north, and F Street to the south. George Washington University is the largest higher education institution in the nation's capitol and has a population of 18,802 undergraduate and graduate students and 6,054 faculty and staff.

Development of the Foggy Bottom Campus is currently governed by the *Foggy Bottom Campus Plan: 2006 - 2025*. Several of the key planning initiatives and goals within this Plan include:

- Grow up, not out: accommodate the University's forecasted space requirements using property and land within the campus' existing boundaries;
- Concentrate development within the campus core and away from existing residential neighborhoods;
- Create a vibrant retail corridor along I Street to serve the Foggy Bottom and West End neighborhoods, the District at large, and the University community;
- Increase tax revenues for the District of Columbia through conversion of Square 54 from non-profit to commercial use;
- Preserve and maintain buildings of architectural and historic significance on the Foggy Bottom campus;
- Enhance GW's ongoing sustainability efforts by employing smart growth and transit-oriented development principles

### Executive Order 13514

In October 2009, President Barack Obama issued Executive Order 13514, "Federal Leadership in Environmental, Energy, and Economic Performance", directing all federal agencies to strengthen their sustainable practices. The order expands upon the Energy Independence and Security Act, the Energy Policy Act of 2005, and Executive Order 13423 by requiring federal agencies to

implement strategies that measure, manage, and reduce greenhouse gas emissions, water consumption, and diversion of materials. The order mandates federal agencies to meet various energy and environmental targets and defines requirements for sustainability in buildings and leases, sustainable acquisition, and electronic stewardship. Goals that are particularly relevant to the renovation of the Federal Office Building at 1800 F Street include:

- Increase agency use of renewable energy and implementing renewable energy generation projects on agency property;
- Reduce the use of fossil fuels;
- Improve water use efficiency and management by:
  - Reducing potable water consumption intensity by 2% annually through fiscal year 2020;
  - Reducing agency industrial, landscaping and agricultural water consumption by 2% annually;
  - Identify, promote, and implement water reuse strategies that reduce potable water consumption;
- Minimize the generation of waste and pollutants through source reduction;
- Divert at least 50% of non-hazardous solid waste by 2015;
- Ensure 95% of all new contracts, including non-exempt contract modifications, require products and services that are energy-efficient, water-efficient, biobased, environmentally preferable, non-ozone depleting, contain recycled-content, non-toxic or less-toxic alternatives;
- Reduce and minimize the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of;
- Beginning in 2020, ensure that all new Federal buildings are designed to achieve zero-net-energy by 2030;
- Ensure at least 15% of existing buildings and leases (>5,000 gross sq ft) meet the Guiding Principles of Federal Leadership in High Performance and Sustainable Buildings by FY2015, with continued progress towards 100%;
- Pursue cost-effective, innovative strategies, such as highly reflective and vegetated roofs, to minimize consumption of energy, water, and materials; and
- By managing existing building systems to reduce the consumption of energy, water, and materials, and identifying alternatives to renovation that reduce existing assets' deferred maintenance costs, ensure that rehabilitation of federally owned historic buildings utilize best practices and technologies in retrofitting to promote long-term viability of the buildings.

### 3.1.3 Public Space

#### The District of Columbia Department of Transportation, Public Space Management

The District Department of Transportation (DDOT) has management and oversight responsibility for the use and occupancy of the public space along city streets. According to DDOT, public space is defined as all the publicly-owned property between the property lines on a street and includes, but is not limited to, the roadway, tree spaces, sidewalks, and alleys. The sidewalks and area between the building face and curblines of the four streets surrounding the 1800 F Street Federal Building is public space owned by the U.S. Government and under the administrative jurisdiction of DDOT. DDOT requires all structures sited within this public space to obtain a Public Space Permit.

In December 2003, DDOT issued Departmental Order 301.03 as a guiding policy for evaluating security requests in public space. The policy states the following:

- Security measures installed to protect buildings shall require a Public Space Permit from the Government of the District of Columbia.
- 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).
- Perimeter barriers shall be no closer than two (2) feet from the curb line and shall not impede pedestrian traffic flow from the curb line to the sidewalk, and shall not present unreasonable barriers to pedestrians traveling within the sidewalk.

#### District of Columbia Public Realm Design Handbook

The *District of Columbia Public Realm Handbook* was created to document policies, procedures, and guidelines on how to properly approach public space. In the handbook, the public realm refers to key elements in the city's public right-of-way, including roadways, sidewalks, planting areas, intersections, alleys, plazas, and other open spaces that comprise the arteries and focal points of the urban framework. The document seeks to document how the public realm should look in terms of materials, visual quality, and landscaping, and to define some standard guidance for enhancing the public realm within the city. Specific topics addressed within the handbook include pavement options, landscaping and street trees, site amenities, lighting, low impact development, features in the roadway, plazas and open space, public art, and coordination.

#### District of Columbia Municipal Regulations Title 24: Building Code, Chapter 32A Encroachments into the Public Right of Way

Title 24, Chapter 32A of the City's Building Code regulates projections into the public space. Projections or encroachments beyond the building line cannot be claimed as a right, and require a permit by DDOT. The policies relevant to the 1800 F Street modernization project include the following:

- 3202.4.2.2 Height. The height of projections above grade shall be limited to the height of the building.

- 3202.4.2.3 Projecting distance: No projection shall extend leaving a clear space of less than 4 feet (1.22 m) from the footprint on the face of the projection to the outer edge of the curb.
- 3202.9.1 Areaways. Areaway projections shall comply with the following requirements:
  - Width. The width to outside of area enclosing walls between lot lines extended is not limited. The extent of projection shall be measured from the building line to the inside face of the areaway wall.
  - 3202.9.1.2 Enclosure height. The height of areaway enclosures shall be limited to the surface of the pavement or grade.

### GSA: Achieving Great Federal Public Spaces

Although not directly related to DDOT's public space policy and review, GSA has published guidelines titled *Achieving Great Federal Public Spaces: A Property Manager's Guide*. This publication was released in 2007 as part of GSA's efforts to evaluate and improve public spaces and transform federal spaces into civic places. According to this guide, GSA buildings and public spaces should:

- Reflect the dignity and accessibility of government;
- Be secure and welcoming;
- Improve tenant satisfaction and building revenue;
- Provide a forum for tenant activity and public use; and
- Act as a catalyst for downtown revitalization.

The guide presents an overall strategy for improvement of a facility's public spaces, from physical enhancements to partnerships with communities, to better management practices. It recognizes as a key challenge the need to increase security at federal facilities while providing welcoming public spaces.

#### **3.1.4 Economics**

The 1800 F Street Federal Building is owned by the federal government and used exclusively for office purposes. As such, the Building does not currently generate tax revenue for the District.

Similarly, the area surrounding the 1800 F Street site is largely occupied by office and institutional uses. Very few of the areas near the project site are used solely for retail purposes. There are, however, several office buildings near 1800 F Street that have small ground floor eateries, coffee shops, boutiques and retail establishments. Food and retail services are also available in several of the George Washington University buildings, located one block west of the site. Due to the large concentration of office uses in the area, most of these retail establishments are open for day-time business hours only.

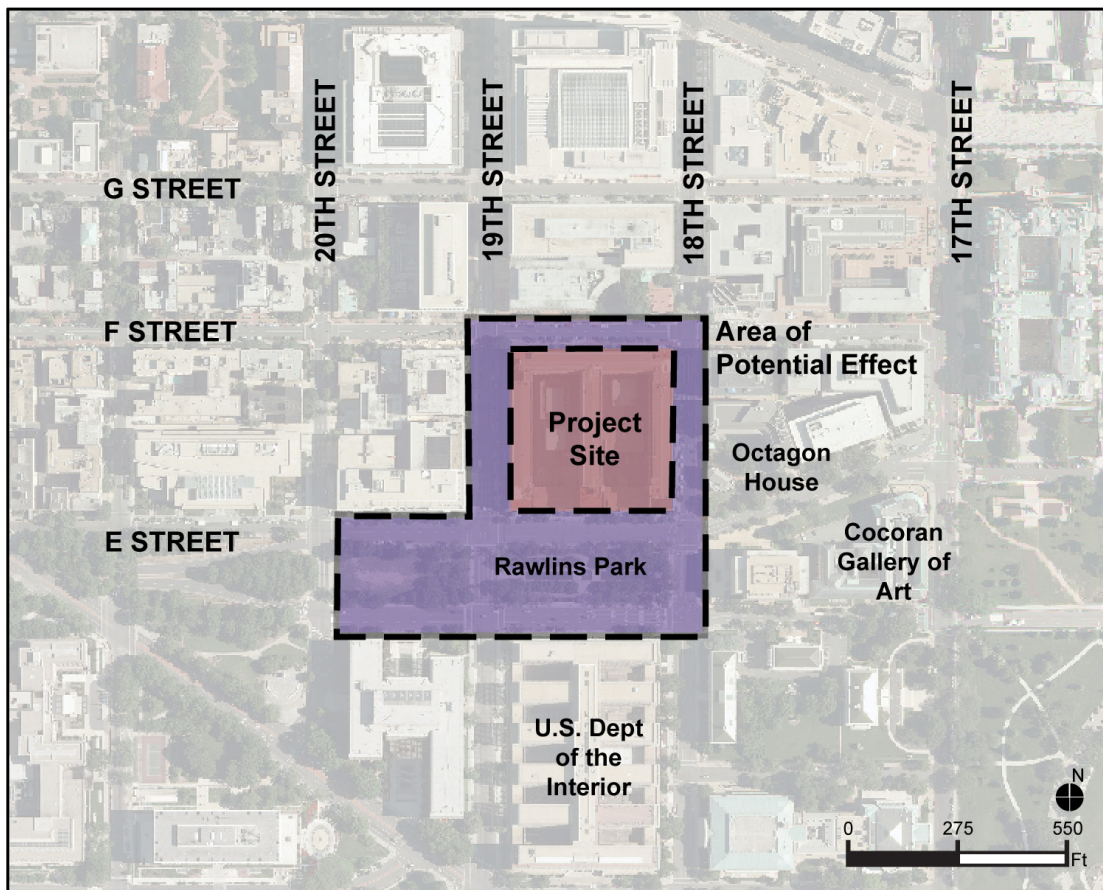
In the future, George Washington University plans to create a retail corridor along I Street, NW, providing key campus and neighborhood-serving retail services. The I Street retail corridor would concentrate street level retail establishments from the I Street Mall at the Foggy Bottom-GMU Metro to the building at 2000 Pennsylvania Avenue.

In conjunction with this EA, Phase I of a two-part market study was recently completed to determine the economic viability of the retail element included in Alternative B. This document was used to evaluate the potential retail demand for the site, as well as the architectural, structural, and building systems required for retail and food establishments. Based on this first level assessment, the study team determined that there is an unmet retail demand and the E Street/Rawlins Park area is an appropriate location to support the envisioned 10,000 to 15,000 square feet of retail space. In Phase II, the study team will further its analysis by the evaluating the economic and market conditions related to the retail addition, as well as the most optimal and efficient use of space for GSA.

### 3.2 Cultural Resources

This section documents the historic and visual resources that are present on the site and within the surrounding area. For reference purposes, the Section 106 consultation process has defined the Area of Potential Effect (APE) for historic resources as the Building and grounds, bordered by F Street, NW to the north, 18th Street, NW to the east, E Street, NW to the south and 19th Street, NW to the west as well as Rawlings Park, the north façade of the Department of Interior building and the L'Enfant Plan as it relates to the perimeter security within the streetscape (see Figure 3-1).

**Figure 3-1: Area of Potential Effect**



Source: AECOM, 2010

#### NHPA Section 106 Process

Pursuant to Section 106 of the NHPA of 1966, federal agencies are required to consider the effects of a proposed project on properties listed in, or eligible for listing in, the National Register of Historic Places (NRHP). In the event that an action may affect a historic property, the lead agency must enter into consultation with the State Historic Preservation Officer, and other interested agencies and individuals to identify historic properties that could potentially be affected, assess potential adverse effects, and resolve the adverse effects through mutually agreed upon mitigation measures. GSA is serving as the lead agency for the Section 106 Consultation.

### 3.2.1 Historic Resources

The Building was constructed in 1917 and reflects the Beaux Arts Classical Revival style. The Building was formerly called the Interior Department Offices or Interior Building. It is a steel-framed structure clad in limestone. In 1934, a seventh floor was added above the Building's original flat roof, and recessed behind the existing parapet. Also in 1934, a cooling tower was added in the west courtyard. The Building is listed on the NRHP, as well as the District of Columbia Inventory of Historic Sites.

#### Building History

The Building has been identified as historically significant for the following reasons:

- The Building served as the headquarters for the DOI between 1917 and 1937. During this period, the Department formulated policy and actions that continue to be relevant today, including the following:
  - The Wheeler-Howard Indian Reorganization Act of 1934, under the Bureau of Indian Affairs, was passed during this period. This Act reversed the practice of “allowing the break-up of Indian reservations into individual allotments, undermining the economic basis of tribal culture.”\*
  - Congress approved the National Park Service (NPS) as a bureau of the DOI in August 1916. Subsequently, the NPS began functioning as a unit out of this Building.
  - The presence of the US Geological Survey (USGS) as the largest tenant in this Building also adds to the Building's historic significance. As part of the Department of Interior, the USGS housed its geological collection, as well as color presses to print topographic maps in this Building. “By 1937, the USGS had surveyed 47 percent of the country's land area...the results of [the] survey studies determined which public lands should be closed to development to conserve mineral and water resources, which could be used for grazing and farming, and after the severe droughts of the 1930s, which lands could be closed to even these activities. These patterns of use had a great impact on the economic development of the middle and western states in particular.”†
- The Building was occupied by two Secretaries of the Interior, each of whom played significant roles in American history. The first was Albert B. Fall, who became infamous when, in 1921 and 1922, he was convicted and imprisoned for accepting bribes to allow oil-drilling on public lands in Wyoming and California. The second Interior Secretary of fame was Harold L. Ickes who, between 1933 and 1946, “oversaw the construction of the Shasta, Friant, Bonneville, and Grand Coulee dams; fully developed the National Park Service to provide for the recreation needs of the nation; and served as the first Federal administrator of public works, which expanded the construction industry and furnished employment during the Depression years.”‡

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\* National Register of Historic Places Inventory - Nomination Form, 1986.

† Ibid.

‡ Ibid.



- The Building is also architecturally significant “for its role as the first Federal government building that was designed as a functional modern office building...As a prototype, it served as a model for the design of subsequent office-like structures to house Federal government functions through the late 1930s.”§ It met Congressional requirements of a “fireproof building of modern office-building type.... The characteristics of modern office design, embodied by the former Interior Building, included: devoting a minimum of interior spaces to purely ceremonial public areas, such as grand lobbies or enclosed central light courts”\*\*. The Building was also the first Federal facility located in the Foggy Bottom area of Washington, DC.

### Building Exterior

The Building is a steel-framed structure clad in Indiana limestone. It measures approximately 400 feet along E and F Streets, NW and 392 feet along 18<sup>th</sup> and 19<sup>th</sup> Streets, NW. The Building rises 86 feet above grade on F Street and 103 feet above grade on E Street.

The street façades are plain and lack ornamentation. Along F Street, the Building has three vertical pavilions: a central one that is three bays wide, and two end pavilions, also three bays wide. The central and two end pavilions contain three doors at street level, whereas the 18<sup>th</sup> and 19<sup>th</sup> Street pavilions contain only windows.

The façades facing 18<sup>th</sup>, 19<sup>th</sup>, and F Streets, NW also contain a “horizontal water-table at the first story window sill, belt courses at the second and sixth story window sills, and a modillioned cornice topped by a simple parapet at the level of the original roof. This cornice consists of a dentil row with round drops at outside corners, and modillions beneath a paneled soffit.”††

The façade along E Street, NW is similar, with a cornice, belt courses, and water-table. The three wings are freestanding above the first story and are connected by a three-storied structure with arched gateways that allow access to the interior courtyards.

The Building exterior has seen very little change since the original construction in 1917 and the additions in 1934. The original exterior doors were replaced in 1970 at all street level entrances.

### Building Interiors

The basic interior plan of the original Building consisted of long, double-loaded corridors along the Head House (portion of the Building adjacent to F Street), and the three wings. Through decades of use, some of the existing partitions have been removed to create larger offices, but the original floor plan is “basically intact.”‡‡ The Building also contains an auditorium (located in the eastern courtyard) and a library (located in the western courtyard) that retain most of their original character. Other historically important features within the Building include: three public lobbies along F Street connected by a public lobby and the Secretary of the Interior’s suite that is

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§ Historic Structures Report, GSA Central Building. Prepared by Velsey Architects, MD, 1986.

\*\* National Register of Historic Places Inventory - Nomination Form, 1986.

†† Ibid.

‡‡ Historic Structures Report, GSA Central Building. Prepared by Velsey Architects, MD, 1986.

located on the sixth story, on the south end of the east wing that now serves as the offices of the Administrator.

### Courtyards

The site includes two courtyards that are bounded by the nine-story wings along the east, west, and north sides, and by a lower, three-story wing along the south side. The courtyards allow maximal sunlight into the Building, as well as provide views towards the National Mall to the south.

The courtyard includes a cooling tower, a library, an auditorium, and a press room. The press room was used to print maps for the USGS and is now used as workshop and storage space. The remaining structures continue to function as originally designed.

### Historic Districts and Sites in the Surrounding Area

There is one historic district (Lafayette Square) and eleven historic properties in the area surrounding the project site that are listed on the NRHP (see Figure 3-2 and Table 3-1). §§ In addition, there are over 30 individual properties and one historic district (17<sup>th</sup> Street Historic District) that are listed on the District of Columbia Inventory of Historic Sites (see Figure 3-2 and Table 3-2). In addition, George Washington University was recently granted concept approval on its Historic Preservation Plan. The plan is included within the *Foggy Bottom Campus Plan: 2006-2025* and is a coordinated and comprehensive approach at identifying, preserving, and maintaining the campuses historic resources. Specifically, the Historic Preservation Plan proposes a potential historic district on the Foggy Bottom Campus and the landmark designation of six additional campus buildings, beyond those already listed within the National and DC historic inventory. The six buildings proposed for landmark designation are:

- 31 G Street, NW - John J. Earley Office and Studio,
- 736 22nd Street, NW - Flagler Apartment Building, now known as Madison Hall,
- 2223 H Street, NW - Everglades Apartment Building, now known as Fulbright Hall,
- 2222 Eye Street, NW - Milton Hall Apartment Building, now known as JBKO Hall,
- 2212 Eye Street, NW - Munson Hall Apartment Building, now known as Munson Hall, and
- 2150 Pennsylvania Avenue, NW - Keystone Apartment Building, now known as H.B. Burns Memorial Building.

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§§ National Park Service website (<http://www.cr.nps.gov/nr/travel/wash/downtownmap.htm>)

**Table 3-1: Properties Listed on the National Register of Historic Places**

Decatur House	Corcoran Gallery of Art
Renwick Gallery	U.S. Department of the Interior
Blair Lee House	D.A.R. Constitution Hall
White House	Lock Keeper's House
Old Executive Office Building	Washington Monument
Octagon House	

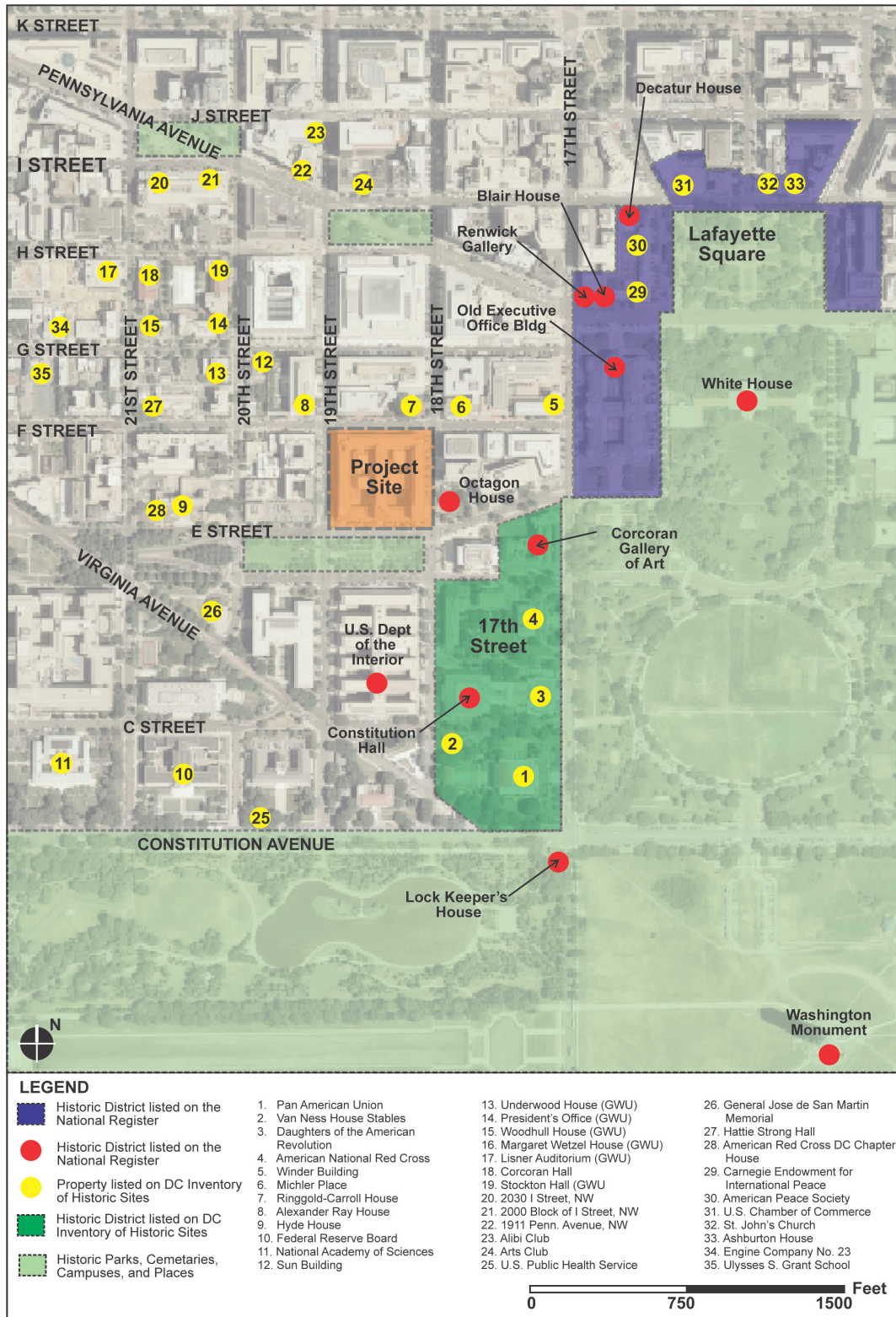
*Source: National Park Service, 2010*

**Table 3-2: Properties Listed on the District of Columbia Inventory of Historic Sites**

Pan American Union	Underwood House (GWU)
Van Ness House Stables	President's Office (GWU)
Daughters of the American Revolution	Woodhull House (GWU)
American National Red Cross	Margaret Wetzel House (GWU)
Winder Building	Lisner Auditorium (GWU)
Michler Place	Hattie Strong Hall (GWU)
Ringgold-Carroll House	Stockton Hall (GWU)
Alexander Ray House	2030 I Street, NW
American Red Cross, D.C. Chapter House	2000 Block of I Street, NW (Red Lion Row)
Federal Reserve Board	1911 Penn. Avenue, NW
National Academy of Sciences	Alibi Club
Corcoran Hall	Underwood House (GWU)
Lenthall Houses	Arts Club
American Peace Society	Carnegie Endowment for International Peace
U.S. Chamber of Commerce	St. John's Church
Ashburton House	United States Public Health Service
General Jose de San Martin Memorial	Ulysses S. Grant School
Engine Company No. 23 (Foggy Bottom Firehouse)	

Source: D.C. Office of Planning, Historic Preservation Office, 2010

Figure 3-2: Historic Resources



Source: D.C. Office of Planning, Historic Preservation Office, 2010

### L'Enfant and McMillan Plans

Recognized as one of the country's most notable achievements in urban planning, the 1791 L'Enfant Plan includes a coordinated system of radiating avenues, vistas, and parks overlaid upon an orthogonal grid of streets. The Plan defines the physical and symbolic character of the nation's capital city through its arrangement of buildings, structures, and views. At the turn of the century, the McMillan Commission expanded on the L'Enfant Plan, extending the Mall to the west and terminating several key visual axes. The L'Enfant and McMillan Plans were listed on the NRHP in 1997.

The rights-of-way surrounding the Building (18<sup>th</sup> Street, NW, F Street, NW, 19<sup>th</sup> Street NW, and E Street, NW), as well as New York Avenue that has an axis along Rawlins Park, are identified as contributing elements to the L'Enfant Plan. The vistas along F, 19<sup>th</sup>, and E Streets, NW are also contributing elements. Finally, Rawlins Park (Reservation 13 as listed on the National Park Service's Historic American Buildings Survey) is a contributing element to the Plan.

### **3.2.2 Visual Resources**

#### Methodology

This section documents the existing visual character of the subject building and surrounding area. The area of visual influence of the proposed action was determined by estimating the visibility of the 1800 F Street Federal Building to viewers from public places. Given the height of the Building, it was concluded that beyond one-half mile, there would be little chance of substantial visual effect from the proposed action. Accordingly, the study area for visual resources was generally defined as within one-half mile of the project site.

#### Visual Character of Site and Immediate Surrounding Area

Office and institutional buildings of a similar scale surround the 1800 F Street Federal Building to the immediate north, east, and west. To the south, Rawlins Park, a linear open space is located adjacent to E Street, NW.

The existing visual characteristics of the areas surrounding the Building that could potentially be affected by the proposed action were determined through field reconnaissance. Several visual character areas within several blocks of the Building were identified, including the National Mall, White House Precinct, George Washington University, and the Pennsylvania Avenue Corridor. Each area is discussed below.

#### National Mall

The National Mall hosts a number of national monuments and cultural attractions and is located three blocks to the south of the 1800 F Street Federal Building. This area provides a park-like setting within which monuments and museums, such as the Washington Monument, Lincoln Memorial and National Museum of American History, are located.

### White House Precinct

Three blocks to the east of the 1800 F Street Federal Building, the White House and its associated grounds and security buffers extend the open space character of the National Mall. Following the closure of Pennsylvania Avenue in front of the White House, as well as other vehicular restrictions due to security considerations, the area around the White House has become a pedestrian zone. Several buildings that are functionally associated with the White House and are located within the immediate surrounds include the Old and New Executive Office Buildings.

### George Washington University

The George Washington University (GWU) is located to the northwest of the project area. The campus includes academic departments, administrative functions, and student housing. The buildings on the easternmost edge of the campus along 19<sup>th</sup> Street, NW, are similar in height to the 1800 F Street Federal Building, with minimum setbacks from the street edge. The visual characteristics of the other buildings on campus vary considerably, reflecting nearly a century of architecture. The campus has developed in its present location since 1912.

### Pennsylvania Avenue Corridor

The Pennsylvania Avenue Corridor consists of a mixture of high-density uses, including restaurants, offices, and portions of the GWU campus. A new building that houses the headquarters of the International Monetary Fund was recently completed at the intersection of Pennsylvania Avenue and 19<sup>th</sup> Street.

**Figure 3-3a: 1800 F Street Federal Building along 18<sup>th</sup> Street, NW**



*Source: AECOM, 2010*

**Figure 3-3b: 1800 F Street Federal Building along F Street, NW**



*Source: AECOM, 2010*



**Figure 3-3c: 1800 F Street Federal Building from corner of 18<sup>th</sup> and E Streets**



*Source: AECOM, 2010*

**Figure 3-3d: Courtyard Entrance on South Side of 1800 F Street Federal Building**



*Source: AECOM, 2010*

### 3.3 Transportation Systems

#### 3.3.1 Vehicular Circulation

##### Roadways

The project site is served by major and minor arterials and a grid network of collector streets. The site is bounded to the north and south by F and E Streets, NW, respectively, which temporarily terminate at Virginia Avenue, NW, four blocks to the west, and 17<sup>th</sup> Street, NW one block to the east. F Street is a collector roadway, while E Street is classified as a principal arterial. The project site is bounded by 18<sup>th</sup> and 19<sup>th</sup> Streets, NW to the east and west, respectively, which are minor one-way arterials that terminate at Constitution Avenue three blocks to the south, and intersect with Pennsylvania Avenue two blocks to the north. Interstate 395 to the south is accessible via 17<sup>th</sup> Street, which is a principal north-south arterial. Along the south side of the Building, E Street is divided into eastbound and westbound lanes by Rawlins Park. A one-block segment of New York Avenue terminates at the intersection of E Street westbound and 18<sup>th</sup> Street, NW at the southeastern corner of the Building. Constitution Avenue (US Highway 50) leads to Interstate 66 to the west.

##### Traffic

Traffic studies completed for projects in the vicinity of the project site identify peak traffic hours in the project area occurring during the weekday morning (7:00 to 9:30 am) and evening (4:00 to 6:00 pm) commute, and during peak tourist season to nearby attractions including the National Mall (three blocks to the south), the White House (three blocks to the east), and the Kennedy Center for the Performing Arts (seven blocks to the southwest). Recent traffic studies in the area include George Washington University's *Square 54 Transportation Impact Study* and *Foggy Bottom Campus Plan Traffic and Parking Report*; DDOT's *Lower West End Traffic Study* and *2008 Traffic Volume Map*; and the traffic analysis included in the *Lafayette Building Perimeter Security Environmental Assessment*.

##### Parking

Parking on the project site is limited to specific building employees for all-day parking within the two building courtyards. There are currently 139 parking spaces available to GSA employees. To maximize parking, vehicles are not self parked. Metered parking is available for visitors on the streets surrounding the Building and adjacent blocks. Off-street parking garages are available in the vicinity of the project site; however, parking garages do not have spaces specifically designated for building employees. The office workers in the 1800 F Street Federal Building and adjacent buildings, GWU staff and students, and visitors to the area use area parking garages as needed.

Trucks and service vehicles access the site through the southern courtyard entrances along E Street, NW. Vehicle screening occurs at the building's two guard stations, where retractable bollards are used to restrict and grant access into the building's courtyards. Delivery and service vehicles also frequently park in the loading zones along E Street.

### 3.3.2 Transit and Pedestrian/Bicycle Circulation

#### Transit System

Three of the five lines of the Washington Metropolitan Area Transit Authority (WMATA) Metrorail System serve the vicinity of the project site, providing east-west and north-south access within the District, local access to Virginia and Maryland, and access to nearby Union Station. The Metro stations in the vicinity of the project site are identified in Figure 1-1. The closest station to the site is the Farragut West station, four blocks to the north on 18<sup>th</sup> Street, NW, which is served by the Orange and Blue lines. The Farragut North Station is located six blocks to the north on 17<sup>th</sup> Street, NW and is served by the Red line, which serves Union Station approximately 1.5 miles to the east. There are five other stations located slightly farther away in the project vicinity: Foggy Bottom – GWU (Blue and Orange lines), McPherson Square (Blue and Orange lines), Metro Center (Blue, Orange, and Red lines), Federal Triangle (Blue and Orange lines), and Smithsonian (Blue and Orange lines). Commuter rail service to Virginia and Maryland, and long distance rail service on Amtrak is also provided at Union Station. District bus service is available in the project area including several bus routes which pass along 18<sup>th</sup> and 19<sup>th</sup> Streets, NW and connect with routes along major arterials in the area. The DC Circulator bus also operates along K Street & 19<sup>th</sup> Street NW, five blocks north of the project site, daily from 7am to 9pm.

#### Pedestrian Circulation

Concrete and brick sidewalks provide pedestrian circulation along both sides of the streets in the vicinity of the Building (Figure 3-4 provides a view of the sidewalk on the E Street side of the Building). Crosswalks with pedestrian signals are provided at signalized intersections in the vicinity of the Building. Pedestrian volumes are high on each of these sidewalks, particularly during AM and PM peak hours and at mid-day. Trucks and service vehicles access the building along E Street, and screening operations occasionally obstruct pedestrian movement.

#### Bicycle Circulation

The roadways in the vicinity of the Building are used for bicycle travel. Off-street bicycle routes are located south of the project area within the greenways of the Monumental Core between Constitution and Independence Avenues and connect with the regional bicycle network.

**Figure 3-4 Sidewalk on South (E Street) Side of 1800 F Street Federal Building**



*Source: AECOM, 2010*

### 3.4 Physical and Biological Resources

#### 3.4.1 Air Quality

In response to the Clean Air Act (CAA) of 1970 and the CAA Amendments of 1977 and 1990, the U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for the protection of human health and welfare. Current NAAQS are set for carbon monoxide (CO), ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), particulate matter equal to or less than 10 microns in size (PM<sub>10</sub>), and fine particulate matter equal to or less than 2.5 microns in size (PM<sub>2.5</sub>). The EPA assesses compliance with the NAAQS for specific geographic regions throughout the United States. Regions that do not meet the NAAQS are called “nonattainment areas.” These non-attainment areas are classified as “marginal”, “moderate”, “serious”, or “extreme” depending on the degree of air pollution and lack of compliance with the NAAQS.

The Building is located within the Metropolitan Washington Region, which includes the District and ten surrounding counties in Virginia and Maryland. The Metropolitan Washington region is currently designated as moderate non-attainment for the federal eight-hour ozone standard and non-attainment for the fine particulate (PM<sub>2.5</sub>) standard. The Washington, DC area is also located within an ozone transport region. The Metropolitan Washington Air Quality Committee (MWAQC), as the region’s lead air quality planning agency, has undertaken planning efforts to bring the region into compliance with the NAAQS.

The EPA requires that non-attainment regions prepare attainment plans aimed at reducing ozone-causing emissions in order to reach compliance with the NAAQS. Federal agencies responsible for an action in a non-attainment area are required to determine if the action either conforms to the prepared regional attainment plan or is exempt from conformity. The EPA has determined that federal actions are exempt from conformity determinations where the total of all reasonably foreseeable direct and indirect annual emissions (1) would be less than specified emission rate thresholds, known as *de minimis* limits, and (2) would be less than 10 percent of the area’s annual emission budget. The general conformity *de minimis* limits for ozone non-attainment areas inside an ozone transport region are 50 tons per year for volatile organic compounds (VOC) and 100 tons per year for nitrogen oxides (NO<sub>x</sub>), which are the primary constituents in the formation of ozone. The *de minimus* limit for direct emissions of PM<sub>2.5</sub> is 100 tons per year.

#### 3.4.2 Noise Levels

Noise can be generally defined as unwanted or unwelcome sound. Noise levels are usually measured in decibels (dB), on a logarithmic scale, that are weighted to sounds perceivable by the human ear (A-weighted sound level (dBA)). A-weighted decibels account for the fact that the human ear is not equally sensitive to all frequencies. Noise levels are typically expressed as an average over a period of time (Leq) since noise sources may produce varying degrees of sound throughout the period of operation or occurrence.

Noise regulations in the District establish maximum permissible sound levels for an operation, activity, or noise source on a property, based on time of day and land use category (i.e., residential, commercial, and industrial). Areas that are zoned commercial (e.g., office buildings) have a maximum allowable noise limit of 65 dBA (daytime) and 60 dBA (nighttime). There are

exceptions to the maximum allowable noise levels in the DC noise regulations such as for construction activities and noise emitting from emergency vehicles. From 7:00 a.m. to 7:00 p.m. on any weekday, noise levels resulting from construction or demolition are limited to a maximum of 80 dBA.

The maximum allowable noise levels are designed to protect human activities or land uses that may be infringed upon by ambient noise. Certain land uses are considered to be noise-sensitive receptors, including residential dwellings, hotels, hospitals, nursing homes, educational facilities, and libraries. Commercial and industrial land uses are generally not considered to be noise-sensitive receptors.

There are no noise sensitive receptors currently on the project site. The only off-site noise sensitive receptors within the project area are the dormitories of GWU one block west of the project site. The predominant existing noise source in the vicinity of the site is vehicle traffic primarily on F, 18<sup>th</sup>, and 19<sup>th</sup> Streets, NW, and to a lesser degree, E Street and New York Avenue, NW. Other intermittent noise sources in the vicinity of the site include sirens of emergency response vehicles, landscape maintenance equipment, and airplane and helicopter flyovers from nearby National Airport and the White House, respectively.

### **3.4.3 Vegetation**

The vegetation around the 1800 F Street Federal Building site primarily consists of landscape plantings, adjacent to the building yard and lightwells, and street trees at the edge of the curb. The landscaping adjacent to the building includes a mix of hollies, pears, small shrubs and annuals. A Lacebark Elm (*Ulmus parvifolia*) is located in the building yard at the northwest corner of the Building. The street trees on the four streets surrounding the Building are mostly oaks and maples, some of which are being crowded by the pear and holly trees within the narrow space between the curb and building yard. There are no highly valued or sensitive plantings, and all landscape materials are typical of the urban streetscape found in Washington, D.C.

### **3.4.4 Stormwater Management Systems**

Stormwater on the project site drains to the south. Stormwater flows combine with sewage and are transported in the District's sewerage system for treatment at the Blue Plains Wastewater Treatment Plant and is subsequently discharged to the Potomac River. Under extreme stormwater events, such as a 15-year rainfall event, temporary back-ups may occur in the system due to insufficient peak capacity in the main and/or pipeline obstructions. During such events, combined flow may be directly discharged into the river as combined sewer overflows (CSO).

The volume of stormwater runoff contribution to the system from the site is based on the site's impervious surface area. Possible contaminants from the site's impervious surfaces (the roof, sidewalks, parking areas, and driveways) may include automobile oil, antifreeze, and grease from parked vehicles, sediment from disturbed or exposed soil, and solid waste collected in the catch basins or storm drains.

### **3.4.5 Hazardous Materials**

The Building potentially contains hazardous materials such as lead-based paint, PCB-containing light ballasts, and asbestos-containing materials. Demolition and restoration activities disturb

these materials, potentially creating health hazards to workers through ingestion, contact absorption, or inhalation of airborne particles.

Once disturbed, these materials are required to be removed from the site and properly treated and disposed of at an appropriate hazardous waste facility. Specific waste haulers, separate from solid waste haulers, are required for removal of these hazardous wastes for proper treatment and disposal at facilities designated for hazardous wastes. Procedures for handling and disposing of these materials are addressed in Chapter 4.

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## **4.0**

# **ENVIRONMENTAL CONSEQUENCES**

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## 4.0 ENVIRONMENTAL CONSEQUENCES

The following chapter assesses the impacts of the two action alternatives and the No Action alternative. In the analysis, impacts are characterized by several factors including intensity, type, and duration. Definitions of these terms and related assumptions are provided below:

**Intensity** – The intensity of an impact describes the magnitude of change that the impact generates. For the majority of the resource areas, the intensity thresholds are as follows:

- Negligible: There would be no impact, or the impact does not result in a noticeable change in the resource;
- Minor: The impact would be slight, but detectable, resulting in a small but measurable change in the resource;
- Moderate: The impact would be readily apparent and/or easily detectable;
- Major: The impact would be widespread and would substantially alter the resource. A major adverse impact would be considered significant under NEPA.

For certain resources, such as visual resources, more specific thresholds are necessary. If applicable, these thresholds are outlined at the beginning of the resource's section.

**Type** – The impact type refers to whether it is adverse (negative) or beneficial (positive). Adverse impacts would potentially harm resources, while beneficial impacts would improve resource conditions. Within the analysis, impacts are assumed to be adverse unless identified as beneficial.

**Duration** – The duration of an impact identifies whether it occurs over a restricted period of time (short-term), or persists over a longer period (long-term). For the purposes of this analysis, it is assumed that short-term impacts would occur during the construction of the improvements, while long-term impacts would persist once the construction is complete. For the purposes of this analysis, impacts are assumed to be long-term unless identified otherwise.

In addition to the factors detailed above, impacts may be characterized as direct, indirect, or cumulative. A direct impact is caused by the action and occurs at the same time and place. An indirect impact is caused by the action, but occurs later in time, or farther removed in distance. A cumulative impact occurs when the proposed action is considered together with other past, on-going, or planned actions.

## **4.1 Socio-Economic Resources Impacts**

### **4.1.1 Land Use**

#### **No Action Alternative**

Under the No Action Alternative, the building modernization and infill would not occur at 1800 F Street. The Building's courtyards and surface parking would remain as is, and no public spaces would be added to the Building. Thus, impacts to land use would be negligible.

#### **Alternative A**

The building modernization and infill in Alternative A would not alter current land uses on the site or within the surrounding area. Alternative A would improve several of the Building's interior features, and with the introduction of a museum, cafeteria and conference room space, the Building would be more publically accessible. These interior changes would have a negligible impact on surrounding land use. The exterior improvements to the Building, as well as the perimeter security features, are not anticipated to have any adverse long-term impacts on land uses within the vicinity of the project site.

#### **Alternative B**

Alternative B would improve several of the Building's interior and exterior features, however, these features would have a negligible impact on the land uses on site or within the surrounding area. In addition to the modernization and infill, this alternative would add ground floor retail to the south side of the Building. The proposed retail scheme would be compatible with existing land uses surrounding the property and could also complement future retail and service uses within the area. The retail function would also support the proposed museum, cafeteria and conference room space, activating the street environment and drawing more visitors into the Building's public spaces. Therefore, the anticipated long-term impacts on land use resulting from the proposed retail use would be beneficial.

### **4.1.2 Planning Controls & Policies**

#### **Zoning**

#### **No Action Alternative**

The 1800 F Street Building is currently owned by the federal government and zoned GOV, Government. Under the No Action Alternative, the interior and exterior infill and modernizations would not occur, and the Building would continue under its current zoning designation. As a result, land use and zoning would remain unchanged and impacts would be negligible.

#### **Alternative A**

Under Alternative A, several of the Building's interior and exterior elements would be improved and the infill development would increase the amount of usable space on site. Changes to use and zoning would not occur and the overall physical character of the site would remain the same. Thus, Alternative A would have a negligible impact on zoning and land uses on site or within the surrounding area.

## **Alternative B**

Alternative B includes modernization, infill, and a ground floor retail addition to the 1800 F Street Building, resulting in a moderate change in the physical character of the site. The site would change from solely office to a mix of office and retail uses. Currently, the project site is exempt from District of Columbia zoning regulations. Although the site is exempt from zoning, the proposed renovations are consistent with the surrounding office uses and neighboring SP-2 zoning designation, which was recently revised to encourage retail and service establishments. The long-term impacts of Alternative B on zoning and land uses on site would be negligible.

## **Planning Policies**

### **No Action Alternative**

Under the No Action Alternative, the site would remain in its current condition. The implementation of the No Action Alternative would not help support the policies of the Federal Elements of the Comprehensive Plan regarding building modernization. Further, since the renovation would not occur, there would be no improvements in sustainability and energy use. Since these and other planning goals would not be supported, the impact of No Action is considered a moderate adverse impact to the long-term goals for federal facilities in Washington, DC.

### **Alternative A**

The infill space would be the same height (92'4" to the parapet) and the same number of stories as the front of the existing Building which has seven stories. Thus the proposed project would conform to the requirements of the *1910 Height of Buildings Act*.

The installation of perimeter security is inconsistent with the Parking Act of 1870, the Building Projection Act 1871, and the overall vision of the L'Enfant Plan. The installation of perimeter security elements surrounding the building would detract from the physical and symbolic character of the area, and would also form barriers between the building facade and public space. As such, Alternative A is inconsistent with legislative intent of these polices. The proposed renovations and infill would be consistent with the *Federal Elements of the Comprehensive Plan for the National Capital*. The proposed renovation would make use of available federally-owned space, eliminating the need to purchase or lease additional land or building space. Through the renovations, office space capacity would increase, alleviating the need to seek out additional space that is currently not federal property. The modernization of the site would also provide the Building's employees with modern technological capabilities, including new communication systems throughout the Building, as well as updated green heating, cooling and ventilation systems. This would enable Building tenants to use modern, technological equipment, resulting in more efficient work products in a more sustainable, green office environment.

Updates to the Building and layout would be consistent with the historic preservation goals and policies identified in the Comprehensive Plan. The additions to the Building would ensure that the new construction is distinguishable from the original structure through an open space floor plan and modern architectural features. In addition, because of its importance in local history, the preservation of the interior would focus on the sixth floor where the original offices of the Secretary of the Interior were located. Additional preservation efforts would include replication

and restoration of the first floor corridor, and retention and restoration of portions of the corridors on the second through fifth floors. However, contrary to the Preservation and Historic Features Element, the proposed perimeter security elements could alter the continuity of views along E Street, a contributing element to the L'Enfant Plan.

Alternative A is consistent with the Transportation Element, as it provides less than one parking space for every five employees, reducing the parking ratio onsite and encouraging employees to use alternative modes of transportation. The construction of a museum, conference room space, and cafeteria would make the 1800 F Street building more inviting and accessible. Alternative A would create a memorable and educational experience for visitors and would also increase pedestrian activity in an area traditionally not associated with federal visitor attractions, all of which further the goals of the Visitor Element.

The proposed modernizations and infill would also comply with portions of the *Comprehensive Plan for the National Capital: District Elements*. The proposed modernization supports the District's environmental goals by improving energy efficiency, reducing operational costs, and improving the overall quality of life of employees within the Building. The proposed modernization and infill would also comply with the District's urban design and historic preservation goals, as it strives for an appropriate balance between restoration and adaptation, and seeks to minimize the impacts of security features on the public realm.

The proposed perimeter security measures under Alternative A would comply with the goals in the *National Capital Urban Design and Security Plan*. This alternative would enhance building security by employing an appropriate mix of bollards (36 inches high) and low garden walls (30 inches high). However, contrary to the *Security Plan Policies and Objectives*, the *National Capital Plan: District Elements*, the proposed perimeter security measures in Alternative A could adversely impact public realm and pedestrian circulation, making the Building's public spaces less inviting, accessible, and attractive for employees and visitors.

The modernization and infill efforts in Alternative A meet the goals of the *National Capital Framework Plan* by creating a more desirable workplace that balances the area's intensive office uses with its civic and cultural places of interest. The proposed museum, cafeteria, and conference room spaces seek to bridge the gap between the Building's office functions and its publicly accessible historic and cultural features. In addition, the Framework Plan seeks to improve linkages along E Street, NW, the Kennedy Center, and the White House. Alternative A supports this goal by providing several pedestrian attractions and amenities on site, which in turn, help to frame E Street, NW as an integral gateway to the city.

The goals within the George Washington University Campus Plan call for the preservation of the historic buildings and the application of greater environmental sustainability efforts on campus. As a neighboring property, the modernization and infill of the 1800 F Street Federal Building would complement these goals by restoring portions of the historic building. The addition of sustainable building components and the reduction of parking on site would further support the Plan's goals, as it reduces the area's environmental footprint and encourages alternative methods of transportation including public transportation, car/vanpools, bicycling, and walking.

The proposed modernization and infill in Alternative A seeks to obtain a LEED Gold rating by incorporating various green technologies throughout the interior and exterior elements of the Building. These practices support the goals within Executive Order 13514 by increasing the Building's energy efficiency, reducing energy and water consumption, and preventing pollution. The beneficial environmental elements added under this alternative include:

- The installation of rooftop photovoltaic and solar hot water panels to reduce the building's energy consumption;
- The installation of low-flow plumbing fixtures and a green roof to achieve a 25% reduction in stormwater runoff;
- Dedicated parking for car/van pools and bicyclists in an effort to encourage and promote alternative modes of transportation;
- The installation of high energy lighting, daylight and occupancy sensors, Energy Star equipment, high efficiency HVAC system components, and upgrades to the exterior walls and building envelop to reduce the building's energy consumption;
- Removal of inefficient HVAC window units;
- Designated recycling areas and the use of rapidly renewable construction materials; and;
- The implementation of a green operations manual and a public education program.

Overall, impacts to planning controls and policies under Alternative A would be minor and adverse due to lack of compliance with several policies regarding perimeter security, with beneficial impacts resulting from reducing energy use and water consumption in accordance with Executive Order 13514.

*Mitigation:*

- In keeping with *National Capital Urban Design and Security Plan* and the *Urban Design and Security Plan Policies and Objectives*, the form and materials of the proposed perimeter security elements should respond to 1800 F Street and its surroundings.
- As the design progresses, coordinate with DDOT on the proposed perimeter security elements in accordance with guidelines presented in their *Design and Engineering Manual*.

**Alternative B**

Under Alternative B, there would be similar impacts to planning policies as Alternative A with the following differences:

- The perimeter security features (except for the existing bollards at the courtyard entrances) would not be installed, eliminating any incompatibilities with the *National Capital Plan: District Elements*, and the *Urban Design and Security Plan Policies and Objectives*, regarding reduced perimeter security for federal buildings where appropriate.
- The proposed retail additions to the south side of the Building are consistent with the goals in the *National Capital Framework Plan*, as it seeks to transform the Building

into an accessible, walkable cultural destination and workplace. When combined with current and future area planning efforts, the Building's retail elements could strengthen the Northwest Rectangle's appeal by creating a welcoming and interconnected environment of vibrant and active streets.

- The proposed retail components are also compatible with the George Washington University Campus Plan and its goals to create a vibrant retail corridor along I Street. The Building's ground floor retail could complement the mix of uses along this corridor, helping to attract and engage visitors, residents, and employees to this part of the city.

*Mitigation:*

- As the design progresses, coordinate with DDOT on all proposed elements within the public space. GSA should also follow all of the guidelines presented in DDOT's *Design and Engineering Manual*.

### **4.1.3 Public Space**

#### **No Action Alternative**

Under the No Action Alternative, the building improvements, perimeter security features and ground floor retail additions would not occur at 1800 F Street. The project site would remain in its current condition and impacts on public space would be negligible.

#### **Alternative A**

In 2001, the ISC published the *Security Design Criteria for New Federal Office Buildings and Major Modernization Projects* (updated in 2004), which required all federal facilities undergoing new construction and major renovation to increase their security measures. This document required federal buildings to include window glazing protection, establish minimum acceptable distances between federal buildings and streets, control vehicular access to buildings, and evaluate the location and securing of air intake vents. Due to heightened concerns about the vulnerability of federal buildings, the ISC's security requirements were increased to provide better protection from potential vehicle bomb attacks. Now, all new and renovated federal buildings are required to include perimeter security elements with a minimum standoff distance of 20 to 50 feet, depending upon the security level.

Although Alternative A meets the ISC's minimum building standoff distance, it does not comply with DDOT's policy of keeping perimeter security measures out of public space. The perimeter security features included as part of this alternative are all within DC's defined public space between the property line and the street curb. The majority of the security bollards and garden walls are located adjacent to the Building where the landscape areas are located, within the existing Building yard (see Figures 2-3 and 2-4). At the two entrances along E Street and the one entrance along 18<sup>th</sup> Street, the bollards are located in the sidewalk, but positioned to minimize interferences with pedestrian flow. The bollards included as part of perimeter security could be placed four feet six and one-half inches apart on center, based on ISC criteria, or five feet apart on center, based on input from NCPC.



This proposed perimeter security scheme would achieve greater security, but would require review and approval by the District's Public Space Committee. DDOT also requires that proposed security features do not block pedestrian flow. The bollards across the sidewalks and entryways could hinder pedestrian flow, especially during peak periods. Alternative A does implement suggestions included in the GSA publication, *Achieving Great Federal Public Spaces: A Property Manager's Guide* to reduce the potential impacts to pedestrians. Overall, the adverse impacts to public space would be moderate.

*Mitigation:*

- Where bollards are unavoidable, the elements should be made less visible and designed to reflect the architectural style of the Building. The bollards should be smaller in size (both shorter and thinner), and spaced farther apart (five feet rather than four feet).
- Coordinate with DDOT, DCOP, and other review agencies throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space.
- GSA would have to obtain a Public Space Permit from DDOT for the perimeter security elements in public space.

**Alternative B**

Under Alternative B, no perimeter security measures would be installed on the project site. Alternative B would comply with DDOT's objective of keeping perimeter security measures out of public space.

While Alternative B does not include perimeter security measures, it does propose ground floor retail along the southern portion of the Building that projects into public space. The one-story retail additions would extend eight to ten feet from the building face (property line). There would be more than ten feet of clear sidewalk space between the edge of the retail additions and the back edge of the tree grates along the sidewalk. The retail additions would also be designed to be demountable within 24 hours in accordance with DDOT regulations for structures in the District's public space. However, because the proposed retail projects into the public space, a DDOT Public Space Permit would be required. As a result, the overall adverse impacts would be moderate.

Alternative B is consistent with several of the policies and plans for this area, including the *Comprehensive Plan for the National Capital Federal and District Elements*, as it achieves the goal of creating federal spaces that are welcoming, inviting and open. The proposed retail uses would also activate the streetscape along E Street, NW, and improve conditions for pedestrians passing by. Beneficial impacts would result from the creation of new retail opportunities along E Street for tourists and visitors walking in this part of the city.

*Mitigation:*

- Coordinate with DDOT and other applicable review agencies throughout the design process to ensure compliance with applicable policies and procedures regarding building within public space.

- GSA would have to obtain a Public Space Permit from DDOT for the retail additions in public space.

#### **4.1.4 Economics**

##### **No Action Alternative**

Under the No Action Alternative, the Building improvements and ground floor retail additions would not occur at 1800 F Street. The project site would remain in its current condition and impacts to economic conditions would be negligible.

##### **Alternative A**

The infill and building modernization in Alternative A would create an additional 120,000 gross square feet of space, and would subsequently increase the Building's day-time employee population by 500. The proposed museum, cafeteria, and conference room would attract additional visitors to the area, and the revenues generated from additional sales taxes would have a slight beneficial impact on the local economy. However, since the building is federal use exempt from local property taxes and no substantial new taxes or revenues would be generated, the overall economic impacts of Alternative A would be negligible.

Although short-term and minimal, Alternative A would also create direct employment opportunities for people in the Building and construction industry across the Washington, DC metropolitan area. If local residents are hired to work on-site and if construction workers spend income in the nearby businesses while on-site, the Building's proposed modernizations would have a short-term minor beneficial impact on the economic conditions of the surrounding community.

##### **Alternative B**

Under Alternative B, there would be similar economic impacts as Alternative A with the following differences:

- In addition to the proposed museum, cafeteria, and conference room spaces, the introduction of retail would attract additional visitors to the area and create more sales taxes than Alternative A. Revenues would also be achieved from tenant leases for the retail space. Overall, the revenues from potential retail leasing and sales taxes generated from resident, employee, and visitor spending associated with Alternative B would have a beneficial impact on the local economy.
- In the long-term, the addition of retail to the Building's ground floor would provide permanent retail employment opportunities for local residents. Because the amount of retail space is limited, the impact of the Building's ground floor retail component on local employment would be minor and beneficial.

## **4.2 Cultural Resources Effects**

### **4.2.1 Historic Resources**

#### **No Action Alternative**

Under the No Action Alternative, building renovations or infill construction would not occur, thus, there would not be effects to historic resources.

#### **Alternative A**

The proposed modernization involves exterior and interior modifications and system replacements. With the infill for Alternative A, the visual façade of the Building would be affected and connections between the infill and existing structure would be required. The infill would also change the character of the internal courtyards. Enclosure and reconfiguration of the courtyard could reduce sunlight currently available to employees overlooking the courtyards and would alter views that have historically been available from within the Building. The modernization project would also add an ADA entrance on the south side of the Building and potentially alter the windows, depending on the option selected for window treatment. These changes would result in a moderate long-term adverse impact on the historic 1800 F Street Federal Building.

Under Section 106 of the NHPA (16 U.S.C. Section 470 (f)), GSA has determined that the proposed renovations and infill would have an adverse effect on the Building, and has consulted with the DC SHPO and the ACHP pursuant to 36 CFR Part 800, regulations implementing Section 106 regarding the effects of the undertaking on the Building. A Memorandum of Agreement (MOA) was prepared and signed by GSA, DC SHPO and ACHP in 2007 to address the potential effects on historic resources (provided in Appendix 5.4). This MOA covered the modernization project as proposed under Alternative A except for the new green building features added to this alternative and the option for window treatment to replace the existing sashes. These latter components of the project (along with the retail component proposed under Alternative B) are being addressed in an amendment to the 2007 MOA currently being prepared by GSA in consultation with the DC SHPO and ACHP (a draft copy of the 2010 MOA Amendment as submitted for review by GSA to the historic review agencies is provided in Appendix 5.4).

The modernization of the Building under Alternative A would be conducted in accordance with the Secretary of the Interior's Standards for Rehabilitation, as described in the 2007 Preservation Program Report developed by Shalom Baranes Associates for GSA. Additionally, removal and reconfiguration of corridor walls would be done in accordance with the Preservation Program Report, in a manner similar to the Office of the Chief Architect located on the third floor of the west wing, maintaining a defined central circulation path to the greatest extent possible. Efforts to preserve the historic structure with regards to existing site and façade conditions would include cleaning and repair of stone masonry, maintenance and restoration of original fenestration, removal of window-unit air conditioners, screening of new rooftop mechanical equipment, and retention of the original limestone façade on the existing portions of the Building.

The proposed solar panels for hot water heating on the roof would not have visual impacts since they are positioned to not be visible from the street or public spaces surrounding the building. Figure 4-1 provides view lines of the roofline from the furthest viewing angle available (on the opposite side of E Street south of Rawlins Park) that confirm this.

**Figure 4-1 Viewing Angles for Solar Panels on 1800 F Street Building**



In addition to having an adverse effect on the 1800 F Street Building, the placement of security barriers within the sidewalk on 18<sup>th</sup> and E Streets under Alternative A would result in a moderate long-term adverse impact and an adverse effect under Section 106 on the L'Enfant Plan. The proposed bollards would form physical and visual barriers between the building faces and the rights-of-way on 18<sup>th</sup> and E Streets, NW, permanently altering the continuity of these roadways and the historic spatial relationships that are hallmarks of the L'Enfant Plan. Further, these security elements would alter views along E Street, NW, a contributing element within the L'Enfant Plan.

*Mitigation:*

- Potential adverse effects caused by Alternative A would be mitigated in accordance with the 2007 MOA previously developed under the NHPA Section 106 consultation process, as well as the 2010 MOA Amendment currently being developed by GSA, the DC SHPO, and ACHP.

**Alternative B**

Alternative B includes many of the same building modernization features as Alternative A with three exceptions: (1) the removal of perimeter security, (2) the addition of retail, and (3) revisions to the E Street entrance and interior spaces on the south side of the building to better accommodate public access. In general, Alternative B would have similar effects on historic resources as Alternative A with regards to the interior building modernization. An Amendment to the MOA is being prepared to address the changes described above along with changes to the

project proposed for both alternatives since 2007 (see Appendix 5.4). Effects on the historic setting of the Building will be reduced by Alternative B since, under this alternative, the perimeter security features would be removed (except for the existing retractable bollards at the courtyard entrances). However, the addition of retail space and other changes on the south side of the Building have additional effects not included with Alternative A. Furthermore, under Alternative B, the expansion of the building along E Street to accommodate the retail elements would have a moderate long-term adverse impact and an adverse effect under Section 106 on the L'Enfant Plan, as it would alter the historic spatial relationships that are a hallmark of the plan. Implementation of measures included in the 2010 MOA Amendment is required to reduce potential adverse effects on historic resources under this alternative.

*Mitigation:*

- Potential adverse effects caused by Alternative B would be mitigated in accordance with the 2007 MOA previously developed under the NHPA Section 106 consultation process, as well as the 2010 MOA Amendment currently being developed.
- On-going review of the retail component of the modernization project should be conducted between GSA, DC SHPO and ACHP to resolve any adverse effects not resolved by the time the NEPA process is completed.

## 4.2.2 Visual Resources

### Methodology

This visual impact assessment addresses potential changes to views and vistas that can be attributed to the proposed action. Impacts to views and vistas are determined by analyzing the existing quality of the view, the sensitivity of the view (such as important views from historic and cultural sites) and the anticipated relationship of the proposed design elements to the existing visual environment.

Visual impacts in the analysis presented below are described in the following categories:

- **No visual impact** – The proposed alterations would not be visible.
- **Minor visual impact** – The proposed alterations would be visible, but would not interfere with views and would not change the character of the existing views.
- **Moderate visual impact** – The proposed alterations would be visible and would interfere with existing views, but would not change the character of the existing views.
- **Major visual impact** – The proposed alterations would be visible as a contrasting or dominant element that interferes with views and substantially changes the character of the existing views.
- **Positive visual impact** – The proposed alterations would improve a view or the visual appearance of an area.

### **No Action Alternative**

Under the No Action Alternative, the proposed building renovations and infill construction would not occur; therefore, impacts on visual resources would not result.

### **Alternative A**

#### *Immediate Surrounding Area*

Under Alternative A, the proposed infill structure and other improvements would not be visible from areas to the north, east or west. Therefore, there would be no adverse impacts on views of the Building from these directions. Removal of the air conditioners from the existing windows will be a beneficial impact on these views.

From the south, the proposed infill structure and proposed southern entrance would be visible from viewpoints along E Street, NW (between 18<sup>th</sup> and 19<sup>th</sup> Street), from Rawlins Park, from the Interior Building to the south, and from the portions of 18<sup>th</sup> and 19<sup>th</sup> Streets, NW that are located adjacent to Rawlins Park. Currently, from these locations, the three north-south wings of the Building, along with the courtyard space between the wings, are visible above the lower connecting structure along E Street, NW.

The proposed infill structure would clearly be visible as an addition to the original structure due to its contemporary architectural style. The southern end of the three wings, as well as the lower connecting structure along E Street, NW would remain visible and identifiable as the “older” structure; however, the courtyard space between the wings would be hidden behind the new infill structure. While this may be considered a visual impact, the extent of the impact would be limited to the portion of E Street, NW between 18<sup>th</sup> and 19<sup>th</sup> Streets, NW and Rawlins Park. Due to its limited visibility, overall, this impact is considered minor.

Perimeter security, which consists of bollards and low garden walls, are designed to be part of the landscaped sideyards and, overall, would have minor adverse visual impacts. At the Building entrances where the sideyards do not exist, the bollards would be freestanding and in line with the security walls, and would be cast iron in keeping with existing materials used on the Building. At the south entrances, the bollards would extend into the sidewalk but since this only occurs in three places, the adverse visual impacts would be minor.

The ADA entrance at the south side of the Building would be designed to be compatible with the Building façade and would have minor impacts on views from this direction.

#### *Distant Viewsheds*

The proposed improvements to the Building would not be visible from a distance (including from the National Mall, the White House Precinct, GWU, and the Pennsylvania Avenue Corridor) due to existing structures and vegetation that surround the Building. The new infill structure would be visible from the viewing gallery on top of the Washington Monument; however, the proposed infill structure would only result in a negligible change to the views available from that location.

*Mitigation:*

- The exterior alterations and enhancements that would impact visual resources should be implemented in accordance with the 2007 MOA that was developed during the NHPA Section 106 consultation process, as well as the 2010 MOA Amendment.
- The conceptual design for proposed Alternative A features (e.g., perimeter security features) should be refined through coordination with District review agencies, CFA and NCPC.

**Alternative B**

Under Alternative B, there would be similar impacts to visual resources as Alternative A with the following differences:

- The perimeter security features (except for the existing bollards at the courtyard entrances) would not be installed so there would be no visual impacts associated with this design element.
- The retail additions on the south side of the Building would be visible from points south including Rawlins Park, E Street, and 18<sup>th</sup> and 19<sup>th</sup> Streets. These additions would be designed as freestanding, glass and metal demountable enclosures that would architecturally complement the new infill structures and other elements of the Building as much as possible. The additions would affect the view corridor along E Street, NE, which is a contributing element to the L'Enfant Plan, although they would not change the character of this view due their scale and height. Overall, there would be an adverse moderate visual impact. Implementation of measures required in the 2010 MOA Amendment (see Appendix 5.4) would also address visual impacts associated with these retail additions.
- Lowering the entrances to at-grade entrances on the south side of the Building would also have a minor impact assuming the new entrances are designed in keeping with the Building's historic character and agreed to by all parties as part of the Section 106 consultation process.

*Mitigation:*

- The exterior alterations and enhancements that would impact visual resources should be implemented in accordance with the 2007 MOA that was developed during the NHPA Section 106 consultation process, as well as the 2010 MOA Amendment.
- The conceptual design for proposed Alternative B features (e.g., retail additions and changes to the south side of the Building) will be refined through coordination with CFA, NCPC and District review agencies, including DDOT, DCOP, and DCSHPO.

## 4.3 Transportation Systems Impacts

### 4.3.1 Vehicular Circulation

#### Roadways & Traffic

##### No Action

Under the No Action Alternative, the Building would remain in its existing condition and the modernization and infill would not occur; therefore, no impacts to roadways or traffic would result.

##### Alternative A & B

###### *Construction Traffic*

In the short-term, some traffic delays could occur during construction. During the construction period for the project, the movement of construction materials, equipment, and workers to the 1800 F Street site would likely constrict roadways in the immediate area, along F Street, E Street, 18<sup>th</sup> Street and 19<sup>th</sup> Street, NW. Overall, construction-related impact would be short-term, moderate, and would not have a lasting effect on the quality of the environment.

###### *Post Construction*

The infill and building modernization in Alternative A would create an additional 120,000 gross square feet of space, and would increase the Building's day-time employee population by 500. The increase in employees on site is likely to intensify traffic around the site, particularly during peak hours. Both of the proposed Alternatives would reduce the supply of parking on site from 139 spaces to 54 spaces. Because the Building currently has a limited parking capacity, it is assumed that transit, other alternative forms of transportation, or the surrounding parking facilities would absorb these impacts. Due to the availability of existing parking garages and transit services in the area, traffic impacts on the roadways surrounding the site would be minor.

Under Alternative B, there would be similar impacts to traffic as Alternative A with the following differences:

- The inclusion of retail in Alternative B is likely to increase the number of visitors on site, possibly impacting vehicular traffic in the surrounding area. Because the Building would incorporate only small-scale, ground floor retail uses catering to pedestrians, the impact on traffic would be minor.
- The retail component in Alternative B would also generate additional truck and delivery traffic. Currently, trucks and delivery vehicles for the Building undergo screening along the southern portion of the Building. Frequently, trucks occupy the loading zones along E Street as well. Because this alternative would likely increase the number of delivery trucks on site, these vehicles could intensify street congestion, particularly during peak hours. Thus, this alternative would have a minor adverse impact on traffic.



*Mitigation:*

- All construction activities should follow DDOT's *Pedestrian Safety and Work Zone Standards* as applicable for construction projects in Washington, DC.
- In order to minimize disruptions on city streets, construction should be completed in phases or during off-peak hours in accordance with DC construction regulations.
- Deliveries by truck to the 1800 F Street Federal Building should be limited to non-peak hours to reduce traffic impacts along E Street, NW.
- GSA currently encourages transit use through the SmartBenefits program. Once occupied, GSA would continue to encourage the use of transit by offering employees the opportunity to participate in the SmartBenefits program. GSA would continue to explore other strategies, such as telecommuting, to encourage employees to use alternative forms of commuting.

**Parking****No Action**

Under the No Action Alternative, the Building's modernization and infill would not occur. The Building's parking supply would remain the same and the impact on parking would be negligible.

**Alternative A**

Under Alternative A, the parking area in the courtyards would be reconfigured as a result of the elimination of two courtyard buildings and the construction of columns to support the infill in the courtyard. The proposed building improvements would support 54 parking spaces, resulting in a loss of 80 spaces overall. Because of this limited parking on-site, most employees are expected to use transit and other alternative forms of commuting to work. The private parking systems that are currently available in the area should be sufficient in supporting any increases in parking demand that are anticipated under Alternative A. The available on-street parking around the Building would not be changed. As a result, the overall long-term impacts on parking would be adverse and minor.

In the short-term, parking on-site during construction would be limited. Due to the availability of other parking garages and transit services in the area, parking impacts during the construction period would be minor.

The screening of vehicles and delivery trucks occurs along E Street, NW, the Building's southern entryway. In both alternatives, screening operations would continue to operate in this area. In order to accommodate deliveries, service vehicles often park in the loading zones adjacent to the two guard booths. Based on the existing roadway conditions and the expected increase in traffic, parking impacts would most likely occur during the PM peak hours. The overall impact of vehicle screening on parking would be minor.

*Mitigation:*

- Deliveries by truck to the 1800 F Street Federal Building should be limited to non-peak hours to reduce traffic and parking impacts along E Street, NW.

**Alternative B**

Under Alternative B, there would be similar impacts to parking as Alternative A with the following differences:

- The proposed retail use is likely to generate additional visitors to the project site. The availability of parking garages and transit services in the area would absorb any minor increases in parking expected. Because the Building would incorporate only small scale, ground floor retail uses oriented to employees in the building and pedestrians and tourists in the area, the overall impact on parking would be minor.

*Mitigation:*

- Deliveries by truck to the 1800 F Street Federal Building should be limited to non-peak hours to reduce traffic and parking impacts along E Street, NW.

**4.3.2 Transit and Pedestrian/Bicycle Circulation****No Action Alternative**

Under the No Action Alternative, the proposed renovations and infill would not occur; therefore impacts to transit and pedestrian/bicycle circulation would not occur.

**Alternative A**

Under Alternative A, the modernization and infill would generate an additional number of employees. The reduction of parking on site would encourage employees to use alternate modes of transportation, particularly transit due to its proximity to rail and bus services. The additional number of employees would likely be absorbed by existing transit system, and the increase in potential users could create a minor adverse impact.

The proposed museum, cafeteria, and conference room space would also generate visitors and tourists and it is anticipated that these visitors would use a mix of transit and vehicular modes of transportation to access the site. The increase in visitors and tourists would be minor and the impact on transit services would be negligible.

The installation of perimeter security elements would disrupt pedestrian circulation, resulting in a moderate adverse impact. The Building is located within the Central Business District (CBD), and District regulations, Title 18 (1201.9), prohibit bicycle riding on sidewalks within the CBD; therefore, perimeter security elements would not impede bicycle circulation. The majority of the security bollards would be placed within the existing Building sideyard set-back and not into the sidewalk. However, bollards along the E Street entrances and at the southern end of 18<sup>th</sup> Street would extend past the building yard and into the sidewalk. Although the E Street and 18<sup>th</sup> Street

bollards would be positioned to minimize interference, a moderate adverse impact on pedestrian circulation would result.

Currently along E Street, NW, large trucks and service vehicles encroach into the sidewalk and public space during deliveries and screening. The impact of screening operations at the south courtyard entrances would create a moderate long-term adverse impact on pedestrian circulation on this side of the Building.

The First Floor lobby on the north side of the Building on F Street, NW, would continue to function as a pedestrian entrance to the Building. Additionally, the new Ground Floor lobby on the south side of the Building on E Street would act as an additional main entrance to the Building. The Building elevators would be reconfigured to provide a total of 14 passenger elevators and one service elevator. This approach provides six passenger elevators near the north entrance and eight passenger elevators and one service elevator near the south entrance. Access to the Building for people with disabilities would be improved and would comply with ADA and ABAAS.

Internal improvements would result in a beneficial impact for employee circulation within the Building. The proposed infill would provide improved access throughout the Building by creating a primary circulation route off of which the major special uses would be located. The infill would connect the upper floors of the Building's south wings, converting the current dead-end wing configuration into a much more efficient and usable continuous pattern of circulation. New high quality space would be concentrated at the end of the Building's wings with desirable views and proximity to other agency facilities.

During the construction phase, the implementation of the Alternative A would result in a minor short-term impact on pedestrian/bicycle access.

*Mitigation:*

- During construction, pedestrians would be redirected via wayfinding signage posted around the site as appropriate.
- During the construction of security measures within pedestrian pathways, appropriate best management practices for construction should be implemented to ensure pedestrian safety.
- Construction vehicle and equipment movement should be minimized during AM and PM peak hours.
- During construction, DDOT's *Pedestrian Safety and Work Zone Standards* should be followed to minimize conflicts with pedestrian and bicycle circulation.
- During the development of the final design for perimeter security, careful consideration should be given to the location of perimeter security elements within public space, and locations chosen to minimize impacts to pedestrian circulation. Final design of perimeter security should be in accordance with the most recent guidance from NCPC and ISC, as well as local public space standards and regulations.

## **Alternative B**

In Alternative B, perimeter security measures would not be incorporated into the proposed building modernization and infill. Thus, overall impacts to transit and pedestrian/bicycle circulation would be reduced under this alternative when compared to Alternative A.

In addition to the infill and modernization, the proposed ground floor retail addition to Alternative B is likely to attract additional people to the project site and surrounding area. Because the retail addition is expected to be small in scale, catering to the existing employees and pedestrians in the area, the impact on transit systems would be minor. Similarly, there would be little impact to bicycle circulation. However, pedestrian circulation could be affected by increased activity on the south (E Street) side of the building, particularly if sidewalk café tables are added outside of eateries or restaurants included with the proposed retail. The adverse impact on pedestrian circulation would be offset by the new public amenities (retail, restaurants, etc.) created at the 1800 F Street site which did not previously exist. This overall impact is, therefore, considered minor. The proposed retail could also increase the amount of trucks and service delivery vehicle on the site. Currently, service delivery vehicles use the south courtyard entrance and the loading zones along the Building's curblin adjacent to E Street, NW. At times, trucks obstruct the sidewalk and public spaces. An increase in truck traffic, particularly during peak hours would increase these occurrences, resulting in a minor adverse impact on pedestrian circulation and flow.

### *Mitigation:*

- During construction, pedestrians would be redirected via wayfinding signage posted around the site as appropriate.
- Construction vehicle and equipment movement should be minimized during AM and PM peak hours.
- During construction, DDOT's *Pedestrian Safety and Work Zone Standards* should be followed to minimize conflicts with pedestrian and bicycle circulation.
- If applicable, follow procedures in DDOT's *Public Realm Design Handbook* and other District regulations for outdoor dining areas in public space.

## 4.4 Physical and Biological Resources Impacts

### 4.4.1 Air Quality

#### No Action Alternative

Under the No Action Alternative, the proposed project would not be implemented; therefore, there would be no air quality impacts.

#### Alternatives A and B

Implementation of either Alternative A or B could result in minor short-term air quality impacts. Construction may affect air quality as a result of (1) construction equipment emissions; (2) fugitive dust from demolition and construction; and (3) emissions from vehicles driven to and from the site by construction workers. Emissions produced during construction would vary daily depending on the type of activity being conducted.

The construction schedule and specific types of equipment that would be used for the demolition and construction have yet to be defined. However, based on assumptions for typical construction equipment used for excavation and construction, the size of the area to be constructed, and construction duration, potential construction emissions are predicted to be less than the *de minimus* thresholds for VOC, NO<sub>x</sub>, and PM<sub>2.5</sub>, and less than 10 percent of the projected area emissions. The project, therefore, would be exempt from an air conformity determination. The impacts related to air quality would be minor and short-term, construction-related only.

Once the modernization project is implemented, pollutant emissions may be generated by the burning of natural gas for water and space heating, based on the volume of space to be heated. In addition, since the Building modernization may result in increased vehicle trips due to an increased number of employees, there would be additional annual mobile emissions. However, operational emissions are predicted to be less than the *de minimis* thresholds and less than 10 percent of the projected area emissions. Therefore, both alternatives would be exempt from determining conformity with the regional air quality attainment plan.

#### *Mitigation:*

- Implementation of appropriate best management practices during construction would reduce, minimize, or eliminate construction vehicle and equipment emissions through:
  - the use of commercial electrical power for construction instead of portable generators,
  - the use of low pollutant-emitting construction equipment, and
  - the use of electrical or alternatively fueled construction equipment wherever feasible.
- When materials are transported off-site, the construction team should cover or wet the materials to limit dust emissions, or at least six inches of freeboard space from the top of the container of material shall be maintained.
- Chemicals, such as paints and solvents used during construction should be contained to avoid drifting and blowing of fumes and dust particles into adjacent areas.

#### 4.4.2 Noise Levels

##### No Action Alternative

Under the No Action Alternative, the proposed building interior demolition, renovation, and renewal would not be performed and the Building additions would not be constructed. Therefore, there would be no noise impacts.

##### Alternatives A and B

Demolition and construction activities under either Alternative A or B would result in intermittent, short-term elevated noise levels that would vary daily based on the activity. Building interior demolition and restoration activities would most likely not be audible to outside receptors. Construction activities performed and equipment used would be major sources of noise, but are not expected to exceed District noise limits for construction. Noise would be generated by heavy trucks transporting solid and hazardous building material waste, and concrete and materials to and from the site. The construction equipment anticipated for the project includes jack hammers during demolition; bulldozers, scrapers, backhoes, and trucks during excavation; backhoes during utility construction; and concrete mixers and pumps, saws, hammers, cranes, and forklifts during auditorium construction. No pile drivers are anticipated to be used during construction.

The District limits weekday construction and demolition noise to 80 dBA Leq from 7 AM to 7 PM, unless a variance is granted. Noise levels during the construction period are expected to be within the District limits and would occur in the daytime during these hours. Therefore, the construction-related noise impacts would be short-term and expected to be minor. Once the construction is completed, any long-term impacts to noise levels would be minimal and similar to existing conditions.

##### *Mitigation:*

- A construction management plan should be prepared and implemented to comply with District noise regulations to ensure that short-term construction-related noise is minimized, and that noise levels between 7:00 AM and 7:00 PM do not exceed 80 dBA at a distance of 25 feet outside the construction site boundary.
- Short-term construction-related noise would be mitigated by controlling noise at their sources by implementing best management practices as necessary to meet these standards. Noise barriers along the site perimeter should be used as necessary to attenuate noise within the construction site.
- It is recommended that construction specifications require the selection of truck routes that would minimize the potential for noise impacts from trucks during construction.

### 4.4.3 Vegetation

#### **No Action Alternative**

Under the No Action Alternative, the proposed renovations and construction would not be performed, thus there would be no impact on the existing landscaping or streets trees adjacent to the Building.

#### **Alternatives A and B**

Under both Alternative A and B, the new construction would remove the existing landscaping immediately adjacent to the Building. The larger holly trees on-site would be relocated and stored off-site during construction and then replanted, and the existing Elm tree in the northwest corner of the site would be retained. The other landscaping would be replaced by new native landscape material appropriate to the 1800 F Street environment. Also, under both Alternatives, no street trees would be removed but construction-related activities and scaffolding activities could adversely impact street trees in the short-term. To comply with the Urban Forest Preservation Act of 2002, a Special Tree Removal Permit would be required for damage or removal of any trees with circumferences larger than 55 inches. Since no trees exist on site of this size, this permit would not be required. However, the proposed construction should comply with the principles put forth in the DDOT *Design and Engineering Manual* and the *DC Public Realm Design Handbook* to avoid impacts to the existing street trees and as guidance for new plantings planned around the Building.

#### *Mitigation:*

- Follow procedures outlined in DDOT's Design and Engineering Manual and Public Realm Design Handbook during construction and when replacing landscape plantings around the Building.

### 4.4.4 Stormwater Management Systems

#### **No Action Alternative**

Under the No Action Alternative, the proposed renovations and construction would not be performed, thus there would be no change in the volume or contaminants of stormwater runoff.

#### **Alternatives A and B**

Under either Alternative A or B, the disturbance of the courtyard for the demolition of courtyard buildings and the construction of the Building infill would temporarily expose minor areas of soil to stormwater erosion, thereby creating potential minor impacts on the quality of stormwater runoff. The disturbed courtyard surfaces would be repaved as part of the parking area. No new permeable surfaces would be paved with impervious surfaces. Therefore, no net increase in impervious surfaces or subsequent increase in stormwater flow is anticipated. Consistent with Executive Order 13514, the project would reduce stormwater flow to DC's sewerage system by 25% through installation of a green roof and systems to collect rainwater for recirculation and reuse within the Building's mechanical systems.

*Mitigation:*

- Short-term construction-related exposure of minor areas of soil to stormwater erosion would be mitigated through the repaving of disturbed paved surfaces, and the avoidance, through best management practices, of paving any new surfaces with pervious materials.

**4.4.5 Hazardous Materials****No Action Alternative**

Under the No Action Alternative, there would be no demolition, modernization, or renewal of the Building. However, the hazardous materials present in the Building, including lead-based paint and asbestos, would remain.

**Alternatives A and B**

Implementation of either Alternative A or B would involve selective demolition of Building systems. Because of the age of the Building, building materials removed during demolition or renovation may contain asbestos, lead, or other hazardous materials. Implementation of the modernization project would result in beneficial impacts on hazardous materials as a result of removal and proper disposal of hazardous substances from the Building.

*Mitigation:*

- Hazardous waste materials found in the Building, including asbestos-containing materials (ACM) and lead-based paints, would be removed and contained consistent with applicable handling regulations by licensed contractors and trained personnel;
- Any asbestos- or lead-bearing waste would be collected, transported, and disposed by a specially licensed contractor in accordance with the requirements of Title 40 CFR Volume 23 Part 763. Hazardous materials removed from the Building would be shipped consistent with applicable transfer regulations to approved waste disposal facilities.
- The contractor would comply with EPA, DOT and all other applicable federal, state, and local regulations for hazardous waste containers. All hazardous waste containers shall be completely sealed and shall be checked for tightness prior to removal from the work area;
- The contractor would provide one copy of the completed Hazardous Waste Manifest no less than five days prior to the scheduled date of removal from the site;
- A Spill Prevention, Control, and Countermeasures (SPCC) Plan may be required for the chemical storage area



## 4.5 Cumulative Impacts

NEPA implementing regulations require an analysis of the cumulative impacts of the proposed action. Cumulative impacts are defined as the impact on the environment that could result from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions. When these projects are considered together with the proposed alternative, cumulative construction and/or operational impacts could potentially result based on project vicinity, timing of construction, and type of operation.

### United States Institute of Peace Headquarters

The United States Institute of Peace is constructing its headquarters building at the corner of Constitution Avenue and 23<sup>rd</sup> Street. The planned headquarters would contain office, library, conference center, and education center components and would house approximately 240 staff members. The project is now under construction.

### Redevelopment of Square 54/I Street Corridor

Square 54 is located at 2200 Pennsylvania Avenue, NW adjacent to the Foggy Bottom-GWU Metro. The 2.5 acre property is owned by George Washington University and is the former site of the George Washington University Hospital. The plans for this site include a mixed-use development of with office space, high-end residential rental units in combination with some workforce and/or affordable housing, and street level retail. The site excavation began in spring of 2008 with an anticipated completion in 2011.

### Department of Interior (DOI) Building Modernization

This project will upgrade and replace major building systems in the approximately 1,300,000 gross-square-foot DOI Building located at 19th and C Streets, NW. Building improvements include upgrade of fire, life safety, and electrical distribution systems; replacement of HVAC equipment; repair/replacement of ceilings and lights; replacement of interior architectural features as needed; relocation of walls and partitions to suit tenant space needs; alterations to ensure compliance with all accessibility codes; and restoration of historically significant spaces.

### Perimeter Security Projects within the Nation's Capital

Numerous perimeter security projects are planned, have been approved, or have been recently completed within Washington, DC (see Figure 4-2). In addition, several rights-of-way have been closed for security purposes. These security improvements are widespread south on the National Mall, east around the U.S. Capitol Building, and west around the White House. Along the National Mall, permanent perimeter security has been installed or approved for installation at the Smithsonian Museums, and in the West End Area, at the federal office buildings including the Office of Personnel Management, Federal Reserve, Department of Interior and Theodore Roosevelt Building. Permanent perimeter security has also been installed at the White House and White House Grounds, and at several buildings near the 1800 F Street site including the World Bank and International Monetary Fund (IMF).

The potential cumulative impacts of either of the alternative actions, when considered with the on-going and planned area development, are described below.

#### **4.5.1 Public Space**

The proposed exterior improvements to the 1800 F Street Federal Building have the potential to create cumulative impacts to public space. The installation of perimeter security elements under Alternative A, when considered together with other perimeter security projects completed or planned within Washington, DC, could adversely impact public space. The potential widespread installation of security elements within DC, if located outside of building property lines, would interrupt the continuity of the area sidewalks, creating a moderate adverse impact to public space.

The construction of Alternative B would likely increase pedestrian activity around the site and could contribute to improving the surrounding areas overall economic and cultural vitality. As indicated in Section 4.1.3, Alternative B would also have moderate adverse impacts on public space, as it occupies and projects into publicly owned land. When combined with other built, planned, and proposed projects in the area, especially those projects with perimeter security elements, the cumulative impact would be moderate adverse, resulting in additional development beyond the property line and a net loss in public space.

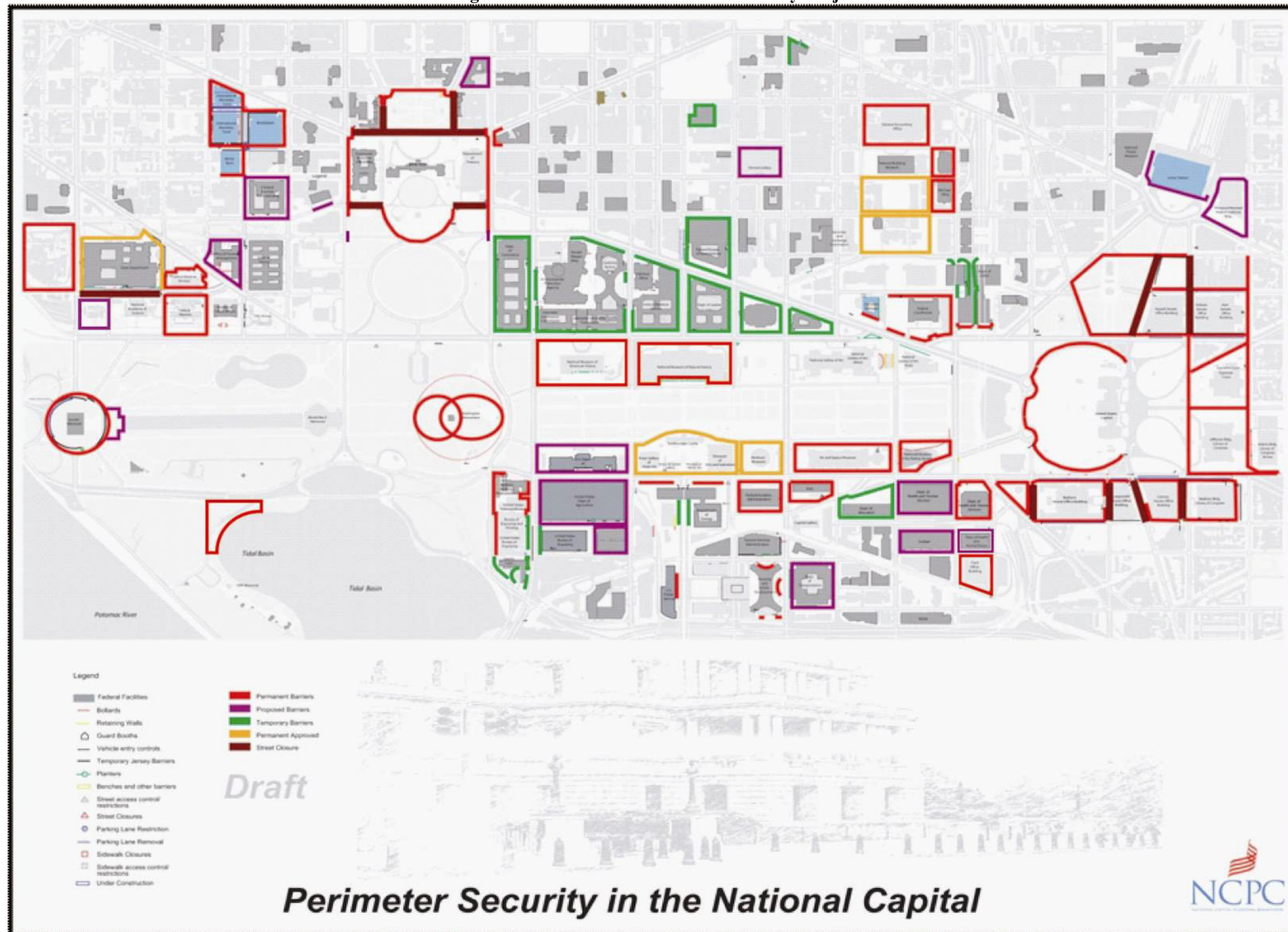
#### **4.5.2 Economics**

The introduction of the museum, conference room, and cafeteria under both alternatives could increase the amount of visitors and pedestrian activity near the site, and when compared to other built, planned, and proposed projects would have a beneficial economic impact on the surrounding area. The introduction of ground floor retail to the project site under Alternative B could induce additional retail growth in the area. Over time, an increase in pedestrian-scaled retail establishments would generate additional tax revenue and employment opportunities for the District, resulting in a beneficial impact to the local economy. Under both alternatives, construction activities would generate short-term construction-oriented jobs and, when considered with the other built, planned, and proposed projects within the city, would have a beneficial impact on the city as a whole.

#### **4.5.3 Historic Resources**

The installation of perimeter security elements under Alternative A has the potential to generate cumulative impacts to historic resources, when considered together with the other perimeter security projects that have been recently completed or are planned within DC. In addition, there could be cumulative impacts to the L'Enfant Plan. The relationship between the roadways and building yards are important features of the plan. Perimeter security placed within the sidewalk between the building yard and roadway interrupt these relationships, potentially creating a moderate adverse impact on the L'Enfant Plan. Although Alternative B would not have perimeter security, when considered with other built, planned, and proposed projects, the impact of the retail additions under Alternative B would be moderate and adverse since they would alter the historic spatial relationships that are integral to the L'Enfant Plan.

Figure 4-2 District-wide Perimeter Security Projects



Source: NCPC, 2007; AECOM, 2010 (Revisions)

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#### **4.5.4 Visual Resources**

The installation of permanent perimeter security under Alternative A, when considered together with other constructed or planned perimeter security within the area of visual influence, has the potential to adversely impact visual resources. Impacts would be greater if security is placed along the street curblin in any of these other projects, as it would interrupt the open visual relationship between the sidewalks and the vehicular rights-of-way. Further, security elements crossing the sidewalk would interrupt continuous views from the walkways. Overall, even though Alternative A has only several locations where perimeter security elements extend beyond the building yard, cumulative impacts to visual resources would be moderate adverse if security elements are placed at the street curblin for the other planned projects in the area and minor adverse if they are placed within the building yard. When combined with other built, planned, and proposed projects in the area, the cumulative impact of Alternative B on visual resources would be adverse and moderate, as it impacts the view corridors along Rawlins Park, E Street, NW, and 18<sup>th</sup> and 19<sup>th</sup> Streets, NW.

#### **4.5.5 Vehicular Circulation**

Activities related to the construction of the both alternatives would add traffic to the project site, impacting vehicular travel paths and the supply of on-street parking. When combined with other planned and proposed projects, the cumulative impacts on the roadways surrounding the site would be minor and adverse; however, the cumulative impact on the regional transportation network would be negligible.

#### **4.5.6 Pedestrian Circulation**

Under Alternative A, the installation of perimeter security would impede pedestrian flow along E and 18<sup>th</sup> Streets, NW. Although the building's security features would be positioned to minimize interference, a moderate adverse impact on pedestrian circulation would occur. Further, the placement of perimeter security elements within the sidewalks at these locations could contribute to a moderate adverse cumulative impact to the pedestrian circulation network in the area if adjacent buildings also install perimeter security outside of their building yards. These elements would hinder pedestrian flow, particularly during peak periods. The perimeter security measures would not be incorporated into Alternative B, thus, the overall impacts to pedestrian circulation would be reduced when compared to Alternative A.

The ground level retail elements in Alternative B, when combined with the other built, planned, and proposed projects, would increase pedestrian activity and attractions in the surrounding area. In addition, the increase in delivery, service, and construction vehicles as a result of Alternative B and the other built, proposed, planned in the surrounding area, could obstruct sidewalks and public spaces at times, resulting in a minor adverse impact on pedestrian circulation.

#### **4.5.7 Physical Resources**

Cumulative air quality impacts would include short-term impacts resulting from construction activities for each project in the area. Due to the timing of each project, short-term air emissions would not increase; however, the staging of projects would increase the duration of time during which construction-related emissions result. Similar to air quality, noise impacts would include

short-term construction-related impacts. Due to the staging of projects and distance between projects, cumulative noise impacts would not be expected.

## **5.0**

# **APPENDICES**

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## 5.0 APPENDICES

### 5.1 References

- American Red Cross. *Environmental Assessment Supplement for the American Red Cross National Headquarters Consolidation*
- District of Columbia Department of Consumer and Regulatory Affairs, Historic Preservation Division. Washington DC Inventory of Historic Places. 2001.
- District Department of Transportation. *Pedestrian Safety and Work Zone Standards*.  
[http://ddot.washingtondc.gov/ddot/cwp/view,a,1250,q,642974,ddotNav\\_GID,1758,ddotNav,|34358|.asp](http://ddot.washingtondc.gov/ddot/cwp/view,a,1250,q,642974,ddotNav_GID,1758,ddotNav,|34358|.asp)
- Executive Order 13514: Federal Leadership in Environmental, Energy, and Economic Performance. <http://edocket.access.gpo.gov/2009/pdf/E9-24518.pdf>. 2009
- George Washington University. *Foggy Bottom Campus Plan 2006-2025*.  
[http://neighborhood.gwu.edu/campusdev/CampusPlan\\_filings.cfm](http://neighborhood.gwu.edu/campusdev/CampusPlan_filings.cfm). 2006
- Government of the District of Columbia. *Comprehensive Plan for Washington DC and Ward 6, 1999*. <http://planning.dc.gov/documents/main.shtm>. 1999.
- National Capital Planning Commission. *Comprehensive Plan for the Nation's Capital: District Elements*. <http://planning.dc.gov/planning/cwp/view,a,1354,q,639789,PM,1.asp>. 2006.
- National Capital Planning Commission. *Comprehensive Plan for the Nation's Capital: Federal Elements*.  
[http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental\\_core\\_framework\\_plan\\_a.aspx#CompPlanPub](http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental_core_framework_plan_a.aspx#CompPlanPub). 2004.
- National Capital Planning Commission. *Federal Capital Improvement Plan for the National Capital Region 2010-2015 (Draft)*.  
[http://www.ncpc.gov/DocumentDepot/Publications/FCIP/FCIPDraft\\_2010\\_2015.pdf](http://www.ncpc.gov/DocumentDepot/Publications/FCIP/FCIPDraft_2010_2015.pdf). 2009.
- National Capital Planning Commission. *Monumental Core Framework Plan: Northwest Rectangle*.  
[http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental\\_core\\_framework\\_plan\\_a.aspx#FrameworkPlanPub](http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental_core_framework_plan_a.aspx#FrameworkPlanPub). 2009
- National Capital Planning Commission. *The National Capital Urban Design and Security Plan*.  
[http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental\\_core\\_framework\\_plan\\_a.aspx](http://www.ncpc.gov/ncpc/Main%28T2%29/Publications%28Tr2%29/iframpages/monumental_core_framework_plan_a.aspx). 2002
- National Capital Planning Commission. *Urban Design Security Policies and Objectives*.  
[http://www.ncpc.gov/DocumentDepot/Actions\\_Recommendations/2005May/Urban\\_Design\\_Security\\_Policy\\_Update\\_Rec\\_6567\\_May2005.pdf](http://www.ncpc.gov/DocumentDepot/Actions_Recommendations/2005May/Urban_Design_Security_Policy_Update_Rec_6567_May2005.pdf). 2005

National Register of Historic Places. <http://www.cr.nps.gov/nr/>. 2001.

United States Code of Federal Regulations. Title 36, Part 800.  
<http://www.gpo.gov/nara/cfr/index.html>. 2002

US General Services Administration. *Achieving Great Federal Public Spaces: A Property Manager's Guide*. [http://www.gsa.gov/graphics/pbs/pmg\\_part1\\_intro.pdf](http://www.gsa.gov/graphics/pbs/pmg_part1_intro.pdf)

US General Services Administration. *GSA Headquarters Modernization: Retail Feasibility Analysis*. 2010.

## 5.2 List of Preparers

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### 5.3 Final EA Notification List

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Ms. Kirsten Brinker Kulis, GSA Liaison

Advisory Neighborhood Council 2A  
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Mr. Frederick Lindstrom, Assistant Secretary

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Corcoran Gallery of Art  
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**5.4 2007 NHPA Section 106 Memorandum of Agreement (MOA) and 2010 MOA Amendment**

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**MEMORANDUM OF AGREEMENT  
AMONG THE GENERAL SERVICES ADMINISTRATION,  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION, AND  
THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE  
REGARDING THE MODERNIZATION OF THE U.S. GENERAL SERVICES  
ADMINISTRATION, NATIONAL OFFICE BUILDING**

This Memorandum of Agreement (MOA) is made as of this 19 day of ~~December~~ December 2007, by and among the United States General Services Administration (GSA), the Advisory Council on Historic Preservation (ACHP), and the District of Columbia State Historic Preservation Office (SHPO) (referred to collectively herein as the "Parties" or "Signatories" or individually as a "Party" or "Signatory") pursuant to Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. 470f, and its implementing regulations 36 CFR Part 800 and sections 110 and 111 of the NHPA.

**WHEREAS**, the United States General Services Administration (GSA) will carry out a comprehensive modernization of the U.S. General Services Administration, National Office Building, located at 1800 F Street, NW, Washington, DC. (Undertaking); and

**WHEREAS**, the GSA National Office Building was constructed in 1917 as the Headquarters for the U.S. Department of the Interior and occupied by GSA as their headquarters in 1949, the building is listed in the National Register of Historic Places with the period of significance extending from 1917 to 1934; and

**WHEREAS**, At this time funding for construction has not been appropriated, but once funded the Undertaking will include: restoration of significant interior public and executive spaces; exterior repairs; elevator upgrades; mechanical, plumbing, and life-safety improvements; perimeter security; changes to tenant spaces; and construction of an in-fill addition.

**WHEREAS**, GSA has defined the Undertaking's Area of Potential Effect (APE) as the building and grounds, bordered by F Street, NW to north, 18<sup>th</sup> Street, NW to the east, E Street, NW to the south and 19<sup>th</sup> Street, NW to the west as well as Rawlins Park, the north façade of the Department of the Interior building and the L'Enfant plan, as it relates to the streetscape that may be affected by the introduction of perimeter security for the building; and

**WHEREAS**, GSA has determined that the Undertaking will have an adverse effect on the National Office Building, and has consulted with the DC State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation (ACHP) pursuant to

36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 USC. Section 470(f)) regarding the effects of the Undertaking on the National Office Building and the L'Enfant Plan; and

**WHEREAS**, Agreement has been reached among the Signatories on the adverse effect associated with the project . However, the National Capital Planning Commission (NCPC) has requested that GSA consider alterations to its proposed perimeter security elements. Therefore, Section II (Further Design Review and Consultation) of the Stipulations further outlines the process for design consultation on perimeter security.

**WHEREAS**, the National Park Service (NPS) was notified in accordance with 36CFR 800.10(c) of the potential adverse effects and invited to participate in the consultation, but did not respond to GSA's request; and

**WHEREAS**, the SHPO and the ACHP have agreed to be signatories to the MOA. GSA has also identified the NCPC and the Commission of Fine Arts (CFA), the Committee of 100 on the Federal City, and the D.C. Preservation League as consulting parties and consulted with them to resolve the effects; and

**WHEREAS**, in accordance with 36 CFR 800.6(a) (1), GSA has notified the ACHP of its adverse effect determination with the specified documentation and the ACHP has chosen to participate in the consultation pursuant to 36 CFR 800.6(a)(1)(iii);

**THEREFORE**; GSA, the SHPO and the ACHP agree that the Undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the Undertaking on the historic property.

## **STIPULATIONS**

### **I. Preservation Program**

The building's restoration will be consistent with the Secretary of Interior's Standards as further described by the attached Preservation Summary Report.(Exhibit 1). The report details the design approach and treatment of spaces as highlighted in Stipulations I-A and I-B of this document.

#### **A. Interior Spaces and Finishes**

1. The entrance lobby on F Street and all three elevator lobbies at the first floor will be maintained in their original configuration and materials treatment. Lobby stone will be cleaned, floor joints will be repointed.
2. The north main entrance revolving door, not original to the building, will be removed and the original style of door will be reinstated. Recreating a series of doors and partitions based on the original design documents likewise will reinstate the three north vestibules. Illustrated in Exhibit 1, **Appendix H**.

3. The Secretary's Office Suite on the sixth floor and the original corridors on the sixth floor will be maintained and restored. Illustrated in Exhibit 1, **Appendix F**.
4. The corridors on the other floors, where preserved, will be restored to their original configuration by removing the arched ceilings that currently conceal the A/C ducts. The terrazzo floor in these corridors will be restored.
5. Historic corridor walls in the head-house, as well as portions of the corridor walls on other wings will be retained. The walls to be retained are indicated on the attached Exhibit 1, **Appendix B - G**. The southern portions of the remaining corridors will be removed. GSA understands that removal of these corridors does not establish a precedent for future projects at this or other historic properties and that exception to the Secretary of Interior's Standards is discouraged.
6. The existing library lobby will have the upper clerestory windows retained and the library stacks will be removed. Non-original doors to the north corridor will be replaced with historically compatible doors. This structure will be used as a child care center.
7. The auditorium will receive only a minimum of renovation, although the seating and carpet are non-original. Damaged plaster in the auditorium will be repaired. Non-original doors at the north corridor entrance will be replaced with historically compatible doors.
8. A new south entry lobby will be constructed to create better flow and egress for the new in-fill construction and associated population and expanded cafeteria that will be located adjacent to the new entry lobby. The new entrance is delineated in the attached Exhibit 1, **Appendix J**.
9. Two fire stairs will be reconfigured to allow egress from the east and west wings directly to 18<sup>th</sup> and 19<sup>th</sup> Streets. This will obviate the need to modify the main lobbies. Details of these exits are shown on the attached Exhibit 1, **Appendix K**.
10. The elevator core locations will remain as original with the exception of the elevator core at the south end of the central corridor, which will be relocated and contain two additional elevators as well as a freight elevator. Illustrated in Exhibit 1, **Appendix B-G**.

#### B. Exterior Alterations and Enhancements

1. Stone masonry will be cleaned and repaired consistent with the Secretary of the Interior's Standards;
2. Existing wood windows will be restored and new interior blast resistant storm windows will be installed on the street sides of the building.
3. Windows at the 7<sup>TH</sup> floor, which are non-contributing, will be replaced. These windows have deteriorated beyond repair.
4. A redesigned E Street entrance will be installed. The design is illustrated in Exhibit 1, **Appendix J**.
5. The press room and the cooling tower structures in the courtyards will be removed. The stone veneer and wood windows from these two structures will

be reused to the maximum extent possible to close the building façade where the press room was attached. Some windows may be new, but the cast iron trim will be retained. Illustrated in Exhibit 1, **Appendix A**.

6. The modernization will include an infill of new floor space in the east and west courtyards. These additions will be set back from the south facade to allow the three original hyphenated tail-house structures to read as the original design intended. The two building in-fills will have a glass and aluminum curtain wall facade with a fritted glass sun screen. These additions will be distinct from the original fabric of the building. Exhibit 1, **Appendix I**.
7. The rooftop mechanical equipment will be screened and positioned where it will be the least visible from the public way in order to minimize visual impacts.
8. Site security will be obtained through the use of a variety of structural elements located at the line of the sidewalk and planting beds. The design is subject to additional review as outlined in stipulation II - B. The design is illustrated in Exhibit 1, **Appendix K - L**.
9. An outside play deck for the childcare area will be provided through the addition of a lightweight deck and bridge from the library structure to the west wing at the first floor level. This will satisfy the requirement for egress and operating code for the childcare center. Illustrated in Exhibit 1, **Appendix C-D**.
10. Non-original structures in the east courtyard will be removed to reveal the original walls.
11. Where the infill construction ties into the existing building the original limestone façade will be retained to distinguish between the new and historic spaces.

## **II. Further Design Review and Consultation**

- A. **Finishes:** Once construction begins, GSA will submit samples of the interior and exterior finish materials to the SHPO for review (CFA will also be included in the review of all exterior materials). These materials include limestone and marble for exterior patching, light fixtures and other finish elements that will be incorporated in the restoration work and are detailed in the preservation program report.
- B. **Egress stairs:** The design for the hand and center guard rails for the egress stairs will be reviewed with the SHPO prior to construction to minimize the adverse effect of life safety code required alterations. The adverse effect is noted in Exhibit 1, Section 2-B, Preservation Design Issues and Prospective Solutions.
- C. The design for perimeter security is included in the Preservation Summary Report and it should be noted that GSA used the Interagency Security Committee (ISC) guidelines and the GSA Decision Support Tool (DST) for the ISC criteria to determine the appropriate level of security for the 1800 F Street Building. GSA has been asked by NCPD to consider a wider spacing interval between bollards,

incorporating a 6-inch structural bollard and a lower bollard height of 30 inches. GSA has incorporated the NCPD recommendations for spacing and sizing; however, the viability of the NCPD recommendations will ultimately be based on subsequent soil tests to determine if the design will meet the ISC blast design criteria, which will be performed once construction has been funded.

- D. Consultation: GSA will submit design documents to address open issues on finishes, egress stairs and perimeter security and shall afford SHPO, ACHP and the consulting parties 30 days to review and comment on the revised designs. GSA will consult with the Signatories and consulting parties, as necessary during or after the 30-day comment period to resolve any adverse effects and respond to any comments or questions.

### **III. Dispute Resolution**

- A. Objections: Should any party to this MOA object to any action carried out or proposed by GSA with respect to the implementation of this MOA, GSA shall consult with the objecting party to resolve the objection.
1. If, after initiating such consultation, GSA determines that the objection cannot be resolved through consultation, GSA shall forward all documentation including without limit, documentation of GSA's responses to the objections, as submitted by the Party or Parties relevant to the objection, to the ACHP, in accordance with 36 CFR 800.2(b)(2). Within 30 days after receipt of all adequate documentation, the ACHP shall exercise one of the following options:
    - a. Upon receipt of documentation from GSA, the ACHP shall review and advise GSA on the resolution of the objection. Any comment provided by the ACHP, and all comments from the parties to the MOA, will be taken into account by GSA in accordance with 36 CFR 800.7(c)(4), in reaching a final decision regarding the dispute.
    - b. If the ACHP does not provide written comments to GSA regarding the dispute within 30 days after receipt of adequate documentation, GSA may render a decision regarding the dispute. In reaching its decision, GSA will take into account all comments regarding the dispute from the parties to the MOA.
  2. GSA's responsibility to carry out all other actions subject to the terms of this MOA that are not subject to the dispute, remain unchanged. GSA will notify all Parties of its decision in writing before implementing that portion of the Undertaking subject to dispute under this stipulation. GSA's decision will be final.

#### **IV. Amendments**

If any signatory to this MOA, including any invited signatory, determines that its terms will not or cannot be carried out or that an amendment to its terms must be made, that party shall immediately consult with the other parties to develop an amendment to the MOA pursuant to 36 CFR Part 800(c)(8). The amendment will be effective on the date a copy signed by all of the original signatories is filed with the ACHP. If the signatories cannot agree to appropriate terms to amend the MOA, any signatory may terminate the agreement in accordance with Stipulation V.

#### **V. Termination**

If the MOA is not amended following the consultation set out in Stipulation IV, any signatory may terminate it. Within 30 days following termination, GSA shall notify the signatories if it will initiate consultation to execute a new MOA with the signatories under 36 CFR Part 800.6(c) (7) and 800.6(c) (8), or request the comments of the ACHP under 36 CFR Part 800.7(a), and proceed accordingly.

#### **VI. Execution**

GSA will carry out its commitments as outlined in the MOA; however this MOA is subject to applicable laws and regulations. As to the Signatories only, fulfillment of this MOA is subject, pursuant to the Anti-Deficiency Act, 31 U.S.C. 1341 et seq., to the availability of funds. This MOA is not an obligation of funds in advance of an appropriation of such funds, and it does not constitute authority for the expenditure of funds. If a Signatory does not have sufficient funds available to fulfill the stipulations of this MOA, such Signatory shall so notify the other Signatories and shall take such actions as are necessary to comply with all requirements of 36 CFR Part 800. Nothing in this MOA shall be deemed to authorize an expenditure of funds in violation of the Anti-Deficiency Act, U.S.C. 1341 et seq.

#### **VII. Duration**

This MOA will be null and void if its terms are not carried out within 10 years from the date of its execution. Prior to such time, GSA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation IV.

#### **VIII. Monitoring and Reporting**


Following the execution of this MOA until it expires or is terminated, GSA shall periodically provide all the signatories to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in GSA's efforts to carry out the terms of this MOA.




**IX. Signatures**

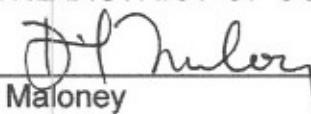
Execution and implementation of this MOA by the Signatories and implementation of its terms, evidence that GSA has afforded SHPO and ACHP an opportunity to comment on the Undertaking, and that GSA has considered the effects of its action on historic properties and fully complies with 36 CFR Part 800, and Sections 110 and 111 of the NHPA.

FOR THE U.S. GENERAL SERVICES ADMINISTRATION

By:  11/26/07  
Bart Bush  
Assistant Regional Administrator  
Public Buildings Service  
National Capital Region  
Date

By:  11/28/07  
Rolando Rivas-Camp, FAIA  
Federal Preservation Officer  
Office of Chief Architect  
Public Buildings Service  
National Office  
Date

FOR THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER

By:  12/10/2007  
David Maloney  
State Historic Preservation Officer  
Date

FOR THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

By:  12/19/07  
John M. Fowler  
Executive Director  
Date

AMENDMENT TO THE MEMORANDUM OF AGREEMENT  
BETWEEN THE U.S. GENERAL SERVICES ADMINISTRATION,  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION AND THE  
DISTRICT OF COLUMBIA, STATE HISTORIC PRESERVATION OFFICE  
REGARDING THE MODERNIZATION OF THE U.S. GENERAL SERVICES  
ADMINISTRATION, NATIONAL OFFICE BUILDING

WHEREAS, the U.S. General Services Administration (GSA) entered into a Memorandum of Agreement (MOA) with the Advisory Council on Historic Preservation (ACHP) and the District of Columbia State Historic Preservation Officer (SHPO) for the modernization of the GSA National Office Building on December 19, 2007; and

WHEREAS, GSA is seeking to amend that agreement pursuant to 36CFR Part 800 (c)(8) to address a change in scope that includes the addition of retail space on E Street, the installation of roof top photo voltaic panels and the in kind replacement of the original window sash.

NOW THEREFORE, in accordance with stipulation IV of the MOA, GSA, the DC SHPO and the ACHP agree to amend the MOA as follows:

1. The third recital is amended to read as follows:

WHEREAS, GSA has received funding for phase 1 of the modernization through the American Recovery and Reinvestment Act (ARRA) and the Undertaking will include: restoration of significant interior public and executive spaces; exterior repairs; elevator upgrades; mechanical, plumbing and life-safety improvements; façade blast improvements; construction of an infill addition; construction of projecting retail space and changes to tenant spaces; and

2. The eighth recital is amended to read as follows:

WHEREAS, the SHPO and ACHP have agreed to be signatories to the MOA and GSA has identified the following as consulting parties: The National Park Service, George Washington University, the Department of the Interior, the Corcoran Gallery, the District of Columbia Department of Transportation, the American Architectural Foundation, the Advisory Neighborhood Council 2A, American Institute of Architects, the Committee of 100, the DC Preservation League, The District of Columbia Office of Planning, the National Trust for Historic Preservation, the National Capital Planning Commission and the Commission of Fine Arts; and

3. The following recitals are added to the MOA:

WHEREAS, GSA is conducting an Environmental Assessment for the modernization and has coordinated its Section 106 consultation with the National Environmental Policy Act (NEPA) in accordance with 36CFR Part 800.8(a); and

WHEREAS, GSA has identified in this consultation that there are no federally recognized Indian tribes in the District of Columbia and GSA, in consultation with the SHPO, will make a good faith effort to identify and contact other appropriate Indian tribes that may attach religious and cultural significance to any historic property that may be affected by the Undertaking.

4. Stipulation I.B-2 is amended as follows:

Existing wood windows will receive replacement sash with laminated glazing to meet blast, glass fragmentation standards. The replacement sash will match the original in profile and detailing and the window frames will be restored.

5. Stipulation I.B-4 is amended as follows:

The E Street entrance will be redesigned and projecting retail bays will be added. The design is illustrated in Exhibit 1, Appendix J.

6. Stipulation I.B-7 is amended as follows:

The rooftop mechanical equipment and photo-voltaic panels will be screened or positioned where they will be least visible.

7. Stipulation IB-8 is amended as follows:

Site security will be limited to bollards at the driveway entrances, which currently exist. Guard booths will be integrated into the new retail structures

8. Stipulation II C for perimeter security design review is amended as follows:

Through the re-evaluation of the Inter-agency Security Criteria (ISC) GSA has determined that the site-wide use of structural elements is no longer necessary at this time. If in the future GSA determines a need for such features, it will re-initiate consultation with the Signatories and consulting parties.

9. Exhibit 1. Appendix I is amended to illustrate the revised south entry and retail bays.

10. Exhibit 1. Appendix J is amended to illustrate the revised south lobby.

11. Exhibit 1. Appendix L is amended to illustrate the revised site security plan.

**This amendment remains in effect unless amended or terminated under Stipulations IV and/or V (Amendment and Termination).**

**Signatories**

FOR THE U.S. GENERAL SERVICES ADMINISTRATION

By: \_\_\_\_\_  
Bart Bush Date  
Regional Commissioner  
Public Building Service  
National Capital Region

By: \_\_\_\_\_  
Beth L. Savage Dater  
Director, Center for Historic Buildings  
Federal Preservation Officer

For the District of Columbia State Historic Preservation Officer

By: \_\_\_\_\_  
David Maloney Date  
State Historic Preservation Officer

For the Advisory Council on Historic Preservation

By: \_\_\_\_\_  
John M. Fowler Dater  
Executive Director