

GSA HEADQUARTERS
BUILDING MODERNIZATION AND COURTYARD INFILL ADDITION

1800 F Street NW
Washington, DC

Finding of No Significant Impact

JUN 28 2010

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary and final building plans for the modernization of the General Services Administration Headquarters, including a courtyard infill addition, located at 1800 F Street, NW in Washington DC, as shown on NCPC Map File No. 23.00(38.00)43092, the May 2010 Environmental Assessment (EA) prepared by the General Services Administration (GSA), and the public comments received by GSA, and I have determined that the proposal will not have a significant impact on the human environment. The scope of this Finding of No Significant Impact (FONSI) is limited to the interior and exterior modernization of the GSA Headquarters building, including the proposed 120,000 gross square foot courtyard addition. This FONSI does not cover any proposed perimeter security improvements or the retail additions also analyzed in the EA.

Proposed Action

GSA prepared an EA, to which NCPC was a cooperating agency, to analyze the potential environmental impacts that could result from the modernization of the GSA Headquarters (the Building) located at 1800 F Street NW.¹ In addition to a No Action Alternative, the EA analyzes two development alternatives described as "Alternative A" and "Alternative B." Alternative A, involves the 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) changes to the building access and egress to include an ADA accessible entrance along the E Street side of the Building; and (5) perimeter security improvements. Alternative A also includes the construction of an additional 120,000 gross square feet (gsf) of building space within the Building's courtyards. Alternative B, GSA's preferred alternative, includes all of the elements described under items 1 – 3 in the list above as well as the 120,000 gsf courtyard addition. No perimeter security elements are proposed in Alternative B with the exception of the existing retractable bollards located at the two courtyard entrances along E Street. Alternative B also includes the placement of ground-floor retail additions along the E Street side of the Building. To

¹ The Environmental Assessment is incorporated by reference into this Finding of No Significant Impact

permit the construction of the retail additions, the Building's south lobby entrance and first floor will be lowered four to six feet to be at-grade. Therefore, an ADA accessible entrance along E Street, as proposed in Alternative A, would not be necessary under Alternative B.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC's Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

Potential impacts

The EA analyzed 13 environmental impact topic areas including: land use; planning controls and policies; public space; economics; historic resources; visual resources; vehicular circulation, transit, pedestrian, and bicycle circulation; air quality; noise; vegetation; stormwater; and hazardous materials.

On May 24, 2010, following its procedures for analysis, public comment, and response to public comments received, GSA issued a FONSI for both Alternative A and Alternative B (preferred alternative). GSA's FONSI notes that "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;" it also notes that the retail addition would comply with a number of federal policies and guidelines "including, but not limited to, the Public Building Cooperative Use Act of 1976, the Comprehensive Plan for the National Capital, the Monumental Core Framework Plan (sic), and GSA's Achieving Great Federal Spaces: A Property Manager's Guide."

As noted above, the scope of the National Capital Planning Commission's FONSI is limited to the proposed interior and exterior modernization of the GSA Headquarters building, including the proposed 120,000 gross square foot courtyard addition, and does not include the other actions covered by the GSA FONSI listed above. NCPC's review of the EA focused in particular on the potential impacts to public space, pedestrian circulation, and historic and visual resources caused by these particular building improvements. The specific environmental impacts identified in the EA that pertain to perimeter security, a new E Street entrance, and ground-floor retail additions will be assessed at a later date when NCPC takes a preliminary or final action on these elements.

Our review found that there will be no significant environmental impacts as a result of the proposed interior and exterior modernization and courtyard addition. The EA does, however, identify several areas where there will be short- and long-term minor to moderate adverse impacts caused by these improvements and possible ways to mitigate these impacts. The EA also indicates that these improvements will have several beneficial impacts, and specifically with respect to current planning controls and policies, economics.

According to the EA, the modernization and courtyard addition will generally result in minor to moderate impacts to transportation systems, physical and biological resources, and historic and visual resources. Short-term impacts to vehicular circulation will result from construction-related activities and will be mitigated through compliance with applicable local regulations, a construction phasing plan, and through scheduling of delivery and construction functions. Following construction, the EA indicates that minor adverse impacts will occur to vehicular circulation as a result of the increase in the number of employees at the Building and the reduction of available parking on-site. These impacts will be mitigated through GSA's continued participation in the SmartBenefits transit program, and through programs such as telecommuting and alternative work schedules.

Long-term minor to moderate impacts to transit, pedestrian, and bicycle circulation will occur as a result of the increased number of employees following completion of the modernization and courtyard addition. The EA states that "the reduction of parking on site would encourage employees to use alternate modes of transportation, particularly transit due to [the project's] proximity to rail and bus services. The additional number of employees would likely be absorbed by [the] existing transit system, and the increase in potential users could create minor adverse impacts. Other impacts identified by the EA include: long-term, moderate, adverse impacts to pedestrian circulation resulting from occasional large trucks and service vehicles encroaching into the sidewalk and public space during deliveries and screening at the south courtyard entrances, and short-term, minor impacts on pedestrian and bicycle circulation during construction. To help mitigate these impacts the EA recommends the use of best practices and adherence to applicable local regulations pertaining to both building service operations and the management of construction activities. Finally, the EA indicates that short-term, minor, adverse impacts will occur to air quality and noise as a result of construction-related activities. Similar to above, the EA recommends adherence to local standards and implementation of appropriate best management practices during construction to help minimize construction vehicle and equipment emissions and noise.

Potential impacts and adverse effects on historic and visual resources were considered in the EA and through the Section 106 process of the National Historic Preservation Act (NHPA). GSA and the District of Columbia State Historic Preservation Officer (DC SHPO) have determined that the proposed interior and exterior modernization of the historic GSA Headquarters Building and courtyard infill addition will have an adverse effect on the Building. On December 19, 2007, GSA, DC SHPO, and the Advisory Council on Historic Preservation (ACHP) entered into a Memorandum of Agreement

(MOA) in order to avoid, minimize, and/or mitigate adverse effects on these historic features. At the time the MOA was executed, the proposed perimeter security and new E Street entrance included in Alternative A, and the proposed ground floor retail additions included in Alternative B, were either still in design development or not yet part of the Undertaking. According to the MOA, NCPC requested that GSA consider alterations to the proposed perimeter security elements, which the MOA takes into account by including stipulations that outline the process for further design consultation on perimeter security. According to Section II.C of the MOA Stipulations, NCPC requested GSA "to consider a wider spacing interval between bollards, incorporating a 6-inch structural bollard and a lower bollard height of 30 inches. Since the proposed new E Street entrance and ground floor retail additions were not yet part of the Undertaking, they are not part of the December 2007 MOA. Currently, GSA, DC SHPO, and the ACHP are working to finalize an amendment to the MOA that will address any new or increased adverse effects caused by these additional project elements. The amended MOA will need to be finalized prior to NCPC taking a preliminary or final action on any of these elements

Cumulative Impacts

With respect to the proposed building improvements included within the scope of this FONSI, the EA has identified only a few cumulative impacts. According to the EA, under both alternatives the introduction of a museum space and publicly accessible conference room and cafeteria could increase the number of visitors and amount of pedestrian activity near the site, and that this could have a beneficial economic impact when considered together with other completed, planned, and proposed projects located nearby. Similarly, the EA identifies cumulative, short-term, beneficial impacts to the city as a whole associated with construction-oriented jobs generated by the proposed action and other projects within the city. Activities associated with the construction of both alternatives are likely to add traffic to the surrounding street network, thereby causing minor adverse cumulative impacts to vehicular travel routes and the supply of on-street parking. However, the EA indicates that cumulative impacts to the regional transportation network would be negligible. Finally, the EA has identified that short-term, adverse impacts to air quality and noise will occur as a result of construction-related activities associated with the proposed action and other building projects nearby. There will be no significant cumulative impacts resulting from this project.



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