Appendix A – Scoping Letters and Comments
Re: Scoping and Public Involvement Notice for an Environmental Assessment under the National Environmental Policy Act and Section 106 of the National Historic Preservation Act for the Proposed Relocation of the Bureau of Labor Statistics to the Suitland Federal Center

Dear Interested Party:

Please be advised that the U.S. General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) for the relocation of the U.S. Department of Labor's Bureau of Labor Statistics (BLS) from Postal Square Building located at 2 Massachusetts Avenue, NE, Washington, DC 20002, to Suitland Federal Center (SFC) located at 4600 Silver Hill Road Suitland, MD 20746.

The National Environmental Policy Act (NEPA) requires Federal agencies to evaluate the potential impacts that a proposed action may have on the human and natural environment. The EA will be prepared in accordance with NEPA and Section 106 of the National Historic Preservation Act (NHPA), in accordance with 36CFR, Part 800.8.

GSA is proposing to relocate approximately 1,800 BLS employees to the SFC. The proposed BLS relocation project will upgrade existing building systems, renovate office space, and improve exterior land uses to support the co-location of three Federal agencies, namely BLS, U.S. Bureau of Economic Analysis (BEA), and the U.S. Census Bureau (Census) within the SFC. The proposed action is intended to provide an efficient interior design that reduces Census' and BEA's building footprints and allows for BLS' backfill of approximately 367,000 rentable square feet (RSF) at the SFC.

NEPA requires a Federal agency to involve the public in the planning and decision-making process. During scoping, GSA is requesting that members of the community, interested agencies, and the general public assist in identifying potential impacts associated with the BLS relocation.
WRITTEN COMMENTS: GSA is accepting comments for 30 calendar days. Agencies and the general public are encouraged to provide written comments to support the development of the EA and Section 106 process. Written comments regarding the EA must be postmarked no later than March 23, 2020, and sent to the following address:

Mr. Paul Gyamfi
Senior NEPA Compliance Specialist
Office of Planning and Design Quality
Public Buildings Service
National Capital Region
U.S. General Services Administration
1800 F Street, NW
Room 4400
Washington, DC 20405

Comments can also be sent by email to paul.gyamfi@gsa.gov; email subject line: BLS Relocation Project Scoping Comments. All emails must be received by 11:59 p.m., March 23, 2020.

If you have any questions, please contact me at (202) 708-5891. Staff inquiries may be directed to Paul Gyamfi, Senior NEPA Compliance Specialist, at (202) 440-3405.

Sincerely,

[Signature]
Darren J. Blue
Regional Commissioner
Public Buildings Service

Enclosure: Project Location Map
BLS EA Comments from EPA

Thank you.
Paul.

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
1800 F Street, NW
Room 4400
Washington, DC 20405
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

-------- Forwarded message --------
From: Traver, Carrie <Traver.Carrie@epa.gov>
Date: Mon, Mar 23, 2020 at 4:42 PM
Subject: BLS Relocation Project Scoping Comments
To: paul.gyamfi@gsa.gov <paul.gyamfi@gsa.gov>
Cc: Rudnick, Barbara <Rudnick.Barbara@epa.gov>

Dear Mr. Gyamfi:

The U.S. Environmental Protection Agency (EPA) has reviewed your letter dated February 23, 2020 regarding the preparation of an Environmental Assessment (EA or Study) to relocate the U.S. Department of Labor’s Bureau of Labor Statistics (BLS), currently located at the Postal Square Building to the Suitland Federal Center (SFC) in Suitland, Maryland. Thank you for providing this notice.

In response, we have recommendations for your consideration in the development of the EA in compliance the National Environmental Policy Act (NEPA) of 1969, the CEQ regulations implementing NEPA (40 CFR 1500-1508) and Section 309 of the Clean Air Act:

**Purpose and Need**
We recommend that the purpose and need of the project be clearly identified in the EA along with a discussion of any alternatives evaluated.

**Traffic and Transportation**

The notice indicates that approximately 1,800 BLS employees will be relocated to the Suitland Federal Center. Therefore, a key component of the Study will be evaluation of potential impacts relating to traffic and transportation, including an assessment of possible effects resulting from the shifts in commuting patterns from the Postal Square Building in Washington D.C. to Suitland, Maryland. Specifically, we suggest the Study include an evaluation of how employees currently commute to work and what changes would be expected, given the current and future transportation options.

- Are the same transportation options fully available to the workforce in the current location as at the SFC or will they be altered? For example, if there is increased parking availability at SFC, will use of the Metro or other public transportation options be decreased?
- Do programs exist or will exist to encourage public transit or ride sharing? Are there--or will there be--opportunities for walking or biking to work?

Whether impacts on local communities may occur from an increase in traffic to SFC should be assessed. In addition to congestion, effects from increased traffic may also include safety, noise, and air quality impacts.

**Socioeconomic Impacts**

The Study should include a discussion of the community and socioeconomic impacts of relocating the workforce and address its effect on tax base, local housing, job markets, schools, utilities, businesses, property values, etc. We recommend an evaluation of positive and negative impacts such as whether the relocation will create additional employment opportunities, the impacts on housing prices and availability, and potential impacts on businesses in the current and proposed locations.

We encourage efforts to inform and engage potentially impacted communities to address concerns that may arise from the proposal.

**Environmental Justice**

We recommend that an assessment be conducted to identify whether areas of potential environmental justice (EJ) concern are present and may be disproportionately impacted by Project activities. This identification should inform appropriate outreach to affected communities to assure that communication regarding project development reaches citizens in an appropriate way and feedback from the affected communities is fully considered.
Methodologies are discussed by several agencies including CEQ. Please consider application of a tool developed by EPA to help users to identify areas with EJ populations: https://www.epa.gov/ejscreen. Additionally, please consider referring to “Promising Practices for EJ Methodologies in NEPA Reviews”: https://www.epa.gov/environmentaljustic/ej-iwg-promising-practices-ej-methodologies-nepa-reviews.

**Stormwater, LID and green infrastructure**
The notice indicates that the project will include upgrading the existing building systems, renovating office space, and improving the exterior land uses. The specific nature of the exterior land use improvement is unclear, but we encourage examination of opportunities to add and enhance green infrastructure to reduce stormwater runoff where possible. We also strongly encourage avoiding direct or indirect impacts to the streams onsite.

Stormwater runoff is one of the leading sources of water pollution in the United States and high percentages of impervious surfaces are linked to aquatic resource degradation and impairment. The addition of green infrastructure or Low Impact Development (LID) components could be beneficial for water quality in the watershed as well as provide a more aesthetically pleasing campus.

A number of options could be implemented to improve the environmental footprint and efficiency of the campus. Where possible, we recommend consideration of opportunities to: protect or enhance native vegetation, avoid constructing additional impervious cover, preserve natural drainage patterns, and/or mitigate existing impacts.

- We recommend evaluating parking, sidewalks, and roadways for opportunities to incorporate green infrastructure enhancement and stormwater best management practices (BMPs) to reduce runoff volume, improve water quality, and enhance the campus. For example, tree pits or trenches along parking areas and sidewalks can provide shade as well as stormwater retention.

- Rain gardens, bioswales, planter boxes, and other vegetation-based BMPs can provided aesthetic enhancement, protect water quality, and also provide foraging habitat for birds and pollinators. Installation of native landscaping could provide visual enhancement of the campus along with improved ecological value.

- If additional parking lot area is planned, we suggest consideration of multi-level parking.

Guidance and resources for implementing green infrastructure practices and LID can be found at the following sites:

- www.epa.gov/greeninfrastructure
- www.epa.gov/nps/lid
- www.epa.gov/smartgrowth
For renovations and facility upgrades, EPA encourages incorporating energy efficient features and infrastructure. Please consider recommendations such as those included in the LEED (Leadership in Energy and Environmental Design) Green Building Rating System. LEED is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. For more information, please review information from the U.S. Green Building Council at: [http://www.usgbc.org/leed](http://www.usgbc.org/leed).

**Hazardous materials**
We recommend that the NEPA document include an analysis of any hazardous materials that may be encountered during the proposed building modifications (such as asbestos containing materials and lead paint), and potential remediation and disposal of such materials.

Likewise, for exterior modifications, any known soil or groundwater contamination should be described in the document along with any testing, remediation actions, and best management practices that will be employed.

**Air Quality- General Conformity**
A general conformity rule analysis should be conducted according to the guidance provided by the EPA in Determining Conformity of General Federal Actions to State or Federal Implementation Plans. Under the general conformity rule, reasonably foreseeable emissions associated with all operational and construction activities, both direct and indirect, must be quantified and compared to the annual de minimis levels for those pollutants in nonattainment for that area.

**Utilities**
The Study would benefit from a discussion of the utilities that will be required for the Project (electric, water, sewer, etc.) and whether existing infrastructure has sufficient capacity.

**Indirect and Cumulative Effects**
The impact assessment should also include indirect and ancillary effects, such as potential secondary growth, associated road upgrades, utility installation or expansion and changes to traffic patterns during construction, etc. We recommend the discussion of cumulative effects include a narrative that clearly describes the incremental impact of the Project when added to other past, present, and reasonably foreseeable future impacts. Tables and figures can help support the indirect and cumulative impact analysis.
Again, thank you for providing us with the opportunity to comment on project scoping. If you have any questions or would like to discuss these comments, please don’t hesitate to contact me.

Sincerely,
Carrie Traver

**Carrie Traver**
Life Scientist
Office of Communities, Tribes, & Environmental Assessment
U.S. Environmental Protection Agency, Region 3
1650 Arch Street – 3RA10
Philadelphia, PA 19103
215-814-2772
traver.carrie@epa.gov
BLS EA Comment

Thank you.
Paul.

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
1800 F Street, NW
Room 4400
Washington, DC 20405
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

Good Afternoon Paul Gyamfi,

This note is to provide scoping comments regarding the move of the Bureau of Labor Statistics from the Postal Square Building to the Suitland Federal Center (due by midnight today).

The letter was sent to Robert Koestler, Director of the Museum Conservation Institute. Please send any further correspondence on this action to Sharon Park and Carly Bond of SI’s Architectural History and Historic Preservation team as well as to Jane Passman and myself from Planning. Together we coordinate SI’s Section 106 and NEPA participation.

We expect that the addition of several thousand staff members to the SFC may have some impact on traffic on nearby roads including Silver Hill Road, and we look forward to
understanding from your NEPA traffic studies what the impact, if any, might be to employee commuting and Smithsonian operations at the Suitland Collections Center. We would also like to discuss opportunities for collaboration on transportation management issues such as advocating for bike sharing stations at the Suitland Metro, developing standards for pedestrian and bike paths at our sites, and on the feasibility of sharing any campus shuttle services. We would hope that there would be positive impacts to local businesses from a greater density of daytime occupants.

The Smithsonian’s National Postal Museum is a current neighbor of the BLS at the Postal Square Building. Does this Section 106 /NEPA cover impacts to that facility as well as to the Suitland site? We hope that the move will not negatively impact our museum operations at that site, or the ongoing stewardship of that National Historic Landmark building.

Thank you for the opportunity to comment.

Sincerely,

Ann Trowbridge
Associate Director for Planning
Smithsonian Facilities
March 26, 2020

Mr. Paul Gyamfi, Senior NEPA Compliance Specialist, Office of Planning and Design Quality  
U.S. General Services Administration  
Public Building Service—National Capital Region  
1800 F Street, NW  
Room 4400  
Washington, DC  20405

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier:  MD20200228-0166  
Applicant:  U.S. General Services Administration  
Project Description: Pre-Environmental Assessment Scoping & Public Notice: Proposed Action Includes Relocation of the U.S. Department of Labor's Bureau of Labor Statistics (1,800 Employees) from Postal Square Building to Suitland Federal Center, and Upgrade Building Systems, Renovate Office Space, and Improve Exterior Land Uses  
Project Address:  4600 Silver Hill Road, Suitland, MD 20746  
Project Location:  Prince George's County  
Recommendation:  Consistent with Qualifying Comments

Dear Mr. Gyamfi:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.02.04-.07, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation.

Review comments were requested from the Maryland Departments of General Services, Natural Resources, Transportation, and the Environment; Prince George's County; the Maryland National Capital Parks and Planning Commission - Prince George's County; and the Maryland Department of Planning, including the Maryland Historical Trust. The Maryland Department of Transportation and Prince George's County did not provide comments.

The Maryland Departments of General Services, and Natural Resources; the Maryland National Capital Parks and Planning Commission - Prince George's County; and the Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

The Maryland Historical Trust has determined that the project will have “no effect” on historic properties and that the federal and/or State historic preservation requirements have been met.

The Maryland Department of Planning did not provide a consistency finding, but they provided the following comments: “This application is for the purpose of notification of an Environmental Assessment under Section 106 for the relocation..."
of the Bureau of Labor Statistics in Washington DC to the Suitland Regional Center (1,800 employees). MDP has no comment at this time.; MNCPPCP: This project relocates 1800 employees to the existing building at Suitland Federal Center. The major focus of this project is space planning and interior renovations. Transportation staff is working with the team on Transportation Analysis. There are no additional comments at this time.”

The Maryland Department of the Environment (MDE) found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below.

1. “Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.

3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.

4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.

5. Any contract specifying ‘lead paint abatement’ must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.”

The State Application Identifier Number must be placed on any correspondence pertaining to this project.
Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at sylvia.mosser@maryland.gov.

Thank you for your cooperation with the MIRC process.

Sincerely,

Myra Barnes, Lead Clearinghouse Coordinator

MB:SM
cc:
Tony Redman - DNR
Amanda Redmiles - MDE
Tina Quinichette - MDOT
Wendy Scott-Napier - DGS
Kathleen Herbert - Pgeo
Jay Mangalvedhe-MNCPCCP
Joseph Griffiths - MDPL
Beth Cole - MHT
BLS EA comment

Begin forwarded message:

From: "Barnett-Woods, Bryan" <bryan.barnett-woods@ppd.mncppc.org>
Date: March 27, 2020 at 8:26:59 AM EDT
To: Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>, "Hancock, Crystal" <crystal.hancock@ppd.mncppc.org>
Subject: Re: US Department of Labor - Bureau of Labor Statistics

Good morning Paul,

Thank you again for the opportunity to respond to the materials presented at the February 27th NEPA Scoping/Coordination Meeting with Prince George's County. Below are our comments.

During that discussion, many in attendance had questions about traffic and operations near that proposed site. With those concerns, we are requesting that additional traffic counts be collected however, based on the recent pandemic, the Prince George's County Planning Department, Transportation Planning Section (TPS) is not accepting traffic counts. With that, we are requesting that either permanent and or/historic traffic counts be obtained from either the Maryland Department of Transportation, State Highway Administration (SHA) and/or the Prince George's County Department of Public Works and Transportation (DPW&T). The area we are requesting counts for includes MD 458 (Silver Hill Road) from MD 5 (Branch Avenue) to MD 4 (Pennsylvania Avenue).

Please do not hesitate to contact us should you have any questions or need assistance contacting the roadway agencies.

Thank you for partnering with us,
Bryan
Crystal,

If you have any comment, please send it to me by COB Friday, March 27, 2020. On the traffic study, the traffic consultant is currently working on the employee survey and the field studies.

Thank you.
Paul.

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On Mar 26, 2020, at 1:52 PM, Hancock, Crystal <crystal.hancock@ppd.mncppc.org> wrote:

Hi Paul,

Hoping that all is well with you and that you are safe.

Is it too late for us to comment on the Scoping Meeting held on February 27th?

Also, based on the information received at the Scoping Meeting, can you share what was decided for the traffic study?

Thanks,
Crystal
Liz,

BLS EA Comment:

I just received this a minute ago. Please address these comments as needed in the final draft.

Thank you.

Paul.

Paul Gyamfi
Senior NEPA Compliance Specialist
General Services Administration
National Capital Region
Public Buildings Services
Office of Planning and Design Quality
1800 F Street, NW
Room 4400
Washington, DC 20405
Desk Tel: (202) 690 9252
Cell: (202) 440 3405

-------- Forwarded message --------
From: Wright, Phyllis J CIV (USA) <phyllis.wright@navy.mil>
Date: Wed, Apr 8, 2020 at 11:37 AM
Subject: FW: GSA LETTER (SUSPENSE: 23 March 2020)
To: Paul.gyamfi@gsa.gov <Paul.gyamfi@gsa.gov>

Mr. G Yamfi,

It was nice speaking with you this morning. Per our discussion, I am forwarding our comments for the record.

Be safe and have a great day!

Vr,
Mr. Gyamfi,

The National Maritime Intelligence Center (NMIC) as a stakeholder of 42 acres located at the Suitland Federal Center (SFC) has the following comments regarding the attached General Services Administration (GSA) letter.

NMIC leadership has a major concern of adding an additional 1800 personnel from the Department of Labor-Bureau of Labor Statistics (DOL-BLS) into the existing Census Bureau facility due to the severe shortage of parking at the SFC. While the SFC is adjacent to a METRO station, this station is only conducive to embarkation to the downtown DC area versus a debarkation station for the SFC. The vast majority of the SFC employees commute via Privately Owned Vehicles (POV) due to lack of available expeditious public transportation. This challenge needs to be addressed by the National Capitol Planning Commission (NCPC) for an appropriate parking to employee ratio. Besides the existing parking ratio concerns, the NMIC will be utilizing a majority of available GSA surface lots through a Memorandum of Agreement (MOA) for the foreseeable future; the NMIC parking garage is slated for demolition and subsequent replacement of surface parking only.

Other concerns are increased POV traffic at the SFC and feeder routes to the compound, the need for additional manning at the SFC gates (during peak commute hours), the potential for a SFC shuttle service, and the increased need for improvements (e.g. seal coating, re-paving, re-stripping) to the existing SFC roadways. The influx of additional personnel to the SFC will also need to consider improvements and maintenance to the SFC outside recreational areas, and the need to remove the dilapidated, abandon, safety hazard NIC-2 building located across Swann road from the NMIC. This all should be addressed in an updated SFC Transportation Management Plan (TMP) in coordination with NCPC.

While NMIC leadership does not oppose the DOL-BLS personnel addition to the SFC, the above investments and considerations by GSA are paramount.
Phyllis J. Wright
Director, Mission Support (N4)
Office of Naval Intelligence
301-669-4450
BLS Comment

Thank you.
Paul.

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
1800 F Street, NW  
Room 4400  
Washington, DC 20405  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

---------- Forwarded message ----------
From: Doris Jones <outlook_C5E3A47F798A9156@outlook.com>  
Date: Tue, Feb 25, 2020 at 4:20 PM  
Subject: BLS Relocation to Suitland  
To: paul.gyamfi@gsa.gov <paul.gyamfi@gsa.gov>

My concern is whether Metro parking can accommodate BLS drivers who chose to park at Metro. Can Census and SFC parking space facilities accommodate more drivers? What about eating or restaurants located inside federal buildings at Suitland Federal Center.

Doris L. Jones

Sent from Mail for Windows 10
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Appendix B – Section 106 Consultation
March 5, 2020

Ms. Beth Cole, Administrator
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032

Re: Proposed Relocation of the Bureau of Labor Statistics (BLS) to the U.S. Census Building at the Suitland Federal Center, Prince George’s County, Maryland

Dear Ms. Cole:

The U.S. General Services Administration (GSA) in cooperation with the U.S. Department of Labor’s Bureau of Labor Statistics (BLS) is proposing to relocate approximately 1,800 BLS employees from the Postal Square Building located at 2 Massachusetts Avenue, NE, Washington, DC, 20002, to the U.S. Census Building at the Suitland Federal Center (SFC) located at 4600 Silver Hill Road, Suitland, MD 20746. As part of the proposed BLS relocation project, GSA will upgrade existing building systems and renovate office space to support the collocation of three Federal agencies: BLS, U.S. Bureau of Economic Analysis (BEA), and the U.S. Census Bureau (Census) within the SFC. The proposed action is intended to provide an efficient interior design that reduces Census’ and BEA’s building footprints and allows for BLS’ backfill of approximately 367,000 rentable square feet (RSF) at the SFC. GSA completed a Master Plan/Environmental Impact Statement (EIS) in 2002 for the redevelopment of the SFC.

The proposed relocation site, the SFC, is located at 4600 Silver Hill Road, Suitland, Maryland and is adjacent to the Suitland Metro Station (see Project Location Aerial Map). The SFC consists of 226 acres of land bounded by Silver Hill Road to the southeast, Suitland Road to the north/northeast, the Washington National cemetery to the west/northwest, and Suitland Parkway to the southwest. The relocation project proposes interior modifications to upgrade the U.S. Census Building’s existing systems and renovate interior office space (“Undertaking”). Therefore, the defined Area of Potential Effects (APE) for both direct impacts and potential visual effects is confined to the interior of the existing U.S. Census Building (see Project APE map).

The Suitland House (PG 75A-21), which lies adjacent to the U.S. Census Building, is the only structure on the SFC that has been determined eligible for listing in the National Register of Historic Places (see Project APE map). The late Colonial Revival suburban estate was constructed in 1937 prior to government acquisition of the land. The 2002 Master Plan/EIS, established a potential SFC Historic District with three contributing historic resources: Federal Office Building-3 (FOB-3) (PG 75A-22), Federal Office Building-4 (FOB-4) (PG 75A-24), and the Suitland House. The Master Plan had no adverse effect on the Suitland House. The demolition of FOB-3, constructed between 1941 and 1942 for the Census Bureau, and FOB-4, constructed in 1947, prior to the construction of the new Census building, resulted in a finding of adverse effect requiring mitigation. A Memorandum of Agreement was executed between GSA and the Maryland SHPO.
The proposed BLS relocation project does not have the potential to affect archaeological resources, but two previous archaeological studies were conducted within the SFC. The first was undertaken prior to the development of the National Maritime Intelligence Center (NMIC) on the SFC campus in 1989. The Phase I archaeological study identified one historic period site containing the possible remains of a tenant house. The site was disturbed and lacked integrity, so the study concluded that no additional archaeological testing was necessary at the site. The second study was undertaken in conjunction with the 1990 development plan for the SFC. A Phase I survey of the SFC determined that no intact cultural deposits were likely to be present throughout the SFC property. Phase II investigations of a previously recorded site, 18PR359, determined that intact cultural deposits were unlikely to have survived, so no additional Phase II testing was recommended. In a letter dated August 10, 2001, the Maryland Historical Trust concurred with GSA’s determination that these “past surveys and documented disturbance indicate little likelihood of the proposed work at the Suitland Federal Center impacting significant archaeological properties.” No additional archaeological investigations were required.

At this time GSA would like to formally initiate consultation for this undertaking with your office pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 U.S.C. § 306108, and its implementing regulations, 36 CFR § 800. GSA is coordinating the Section 106 and NEPA processes per the implementing regulations of the NHPA. For both NEPA and Section 106, GSA will act as the lead agency with BLS participating as a cooperating agency.

Based on our recent analysis of potential cultural resources within the APE and prior findings by the Maryland Historical Trust for the previous SFC redevelopment Master Plan, we have determined that the project will have no adverse effects (NAE) on historic resources including archaeological sites and is consistent with local zoning and land use policies for development. Attached for your convenience are findings on this property for said prior Undertakings, including the 2001 Section 106 findings from the MHT.

We seek your review and concurrence in our determination for this Undertaking in accordance with the Advisory Council’s Procedures for the Protection of Historic Properties, 36 CFR 800.3 (a), (c, 3) and 800.5 (b). Please contact me at todd.satter@gsa.gov or 202-256-7926 if you would like further information about the Undertaking.

Sincerely,

Todd Satter
Regional Historic Preservation Specialist
National Capital Region
General Services Administration

Enclosures
MHT Compliance Project Review Form
Project Location Aerial Map
Project APE Map
Project Photographs
2001 MHT SHPO Determination
March 5, 2020

Ms. Beth Cole, Administrator
Maryland Historical Trust
100 Community Place
Crownsville, MD 21032

Re: Proposed Relocation of the Bureau of Labor Statistics (BLS) to the U.S. Census Building at the Suitland Federal Center, Prince George’s County, Maryland

Dear Ms. Cole:

The U.S. General Services Administration (GSA) in cooperation with the U.S. Department of Labor’s Bureau of Labor Statistics (BLS) is proposing to relocate approximately 1,800 BLS employees from the Postal Square Building located at 2 Massachusetts Avenue, NE, Washington, DC, 20002, to the U.S. Census Building at the Suitland Federal Center (SFC) located at 4600 Silver Hill Road, Suitland, MD 20746. As part of the proposed BLS relocation project, GSA will upgrade existing building systems and renovate office space to support the collocation of three Federal agencies: BLS, U.S. Bureau of Economic Analysis (BEA), and the U.S. Census Bureau (Census) within the SFC. The proposed action is intended to provide an efficient interior design that reduces Census’ and BEA’s building footprints and allows for BLS’ backfill of approximately 367,000 rentable square feet (RSF) at the SFC. GSA completed a Master Plan/Environmental Impact Statement (EIS) in 2002 for the redevelopment of the SFC.

The proposed relocation site, the SFC, is located at 4600 Silver Hill Road, Suitland, Maryland and is adjacent to the Suitland Metro Station (see Project Location Aerial Map). The SFC consists of 226 acres of land bounded by Silver Hill Road to the southeast, Suitland Road to the north/northeast, the Washington National cemetery to the west/northwest, and Suitland Parkway to the southwest. The relocation project proposes interior modifications to upgrade the U.S. Census Building’s existing systems and renovate interior office space (“Undertaking”). Therefore, the defined Area of Potential Effects (APE) for both direct impacts and potential visual effects is confined to the interior of the existing U.S. Census Building (see Project APE map).

The Suitland House (PG 75A-21), which lies adjacent to the U.S. Census Building, is the only structure on the SFC that has been determined eligible for listing in the National Register of Historic Places (see Project APE map). The late Colonial Revival suburban estate was constructed in 1937 prior to government acquisition of the land. The 2002 Master Plan/EIS, established a potential SFC Historic District with three contributing historic resources: Federal Office Building-3 (FOB-3) (PG 75A-22), Federal Office Building-4 (FOB-4) (PG 75A-24), and the Suitland House. The Master Plan had no adverse effect on the Suitland House. The demolition of FOB-3, constructed between 1941 and 1942 for the Census Bureau, and FOB-4, constructed in 1947, prior to the construction of the new Census building, resulted in a finding of adverse effect requiring mitigation. A Memorandum of Agreement was executed between GSA and the Maryland SHPO.
The proposed BLS relocation project does not have the potential to affect archaeological resources, but two previous archaeological studies were conducted within the SFC. The first was undertaken prior to the development of the National Maritime Intelligence Center (NMIC) on the SFC campus in 1989. The Phase I archaeological study identified one historic period site containing the possible remains of a tenant house. The site was disturbed and lacked integrity, so the study concluded that no additional archaeological testing was necessary at the site. The second study was undertaken in conjunction with the 1990 development plan for the SFC. A Phase I survey of the SFC determined that no intact cultural deposits were likely to be present throughout the SFC property. Phase II investigations of a previously recorded site, 18PR359, determined that intact cultural deposits were unlikely to have survived, so no additional Phase II testing was recommended. In a letter dated August 10, 2001, the Maryland Historical Trust concurred with GSA’s determination that these “past surveys and documented disturbance indicate little likelihood of the proposed work at the Suitland Federal Center impacting significant archaeological properties.” No additional archaeological investigations were required.

At this time GSA would like to formally initiate consultation for this undertaking with your office pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 U.S.C. § 306108, and its implementing regulations, 36 CFR § 800. GSA is coordinating the Section 106 and NEPA processes per the implementing regulations of the NHPA. For both NEPA and Section 106, GSA will act as the lead agency with BLS participating as a cooperating agency.

Based on our recent analysis of potential cultural resources within the APE and prior findings by the Maryland Historical Trust for the previous SFC redevelopment Master Plan, we have determined that the project will have no adverse effects (NAE) on historic resources including archaeological sites and is consistent with local zoning and land use policies for development. Attached for your convenience are findings on this property for said prior Undertakings, including the 2001 Section 106 findings from the MHT.

We seek your review and concurrence in our determination for this Undertaking in accordance with the Advisory Council’s Procedures for the Protection of Historic Properties, 36 CFR 800.3 (a), (c, 3) and 800.5 (b). Please contact me at todd.satter@gsa.gov or 202-256-7926 if you would like further information about the Undertaking.

Sincerely,

Todd Satter
Regional Historic Preservation Specialist
National Capital Region
General Services Administration

Enclosures
MHT Compliance Project Review Form
Project Location Aerial Map
Project APE Map
Project Photographs
2001 MHT SHPO Determination
Proposed Relocation of the Bureau of Labor Statistics (BLS) to the Suitland Federal Center, Prince George’s County, Maryland – Section 106 Project Review - Photographs

U.S. Census Bureau Building exterior, facing north-northwest (2020).

U.S. Census Bureau Building exterior, facing southeast (2020).
The Suitland House, southeast façade, facing northwest (2020).

View of the Suitland House (right) and the U.S. Census Bureau Building (left), facing south (2020).
August 10, 2001

General Services Administration
Attn: Mr. Jag Bhargava, Project Executive
Portfolio Development Division
7th and D Streets, SW
Washington, DC 20407

Re: Suitland Federal Center, Draft Environmental Impact Statement for the Programmatic Development Plan and Phase 1 Implementation, Prince George’s County
State Clearinghouse #MD20010723-0832

Dear Mr. Bhargava:

In response to GSA’s request of July 12, 2001, the Maryland Historical Trust (MHT) has reviewed the above-referenced plan and project in accordance to Section 106 of the National Historic Preservation Act with respect to effects on historic properties.

We concur that past surveys and documented disturbance indicate little likelihood of the proposed work at the Suitland Federal Center impacting significant archeological properties. Therefore, no archeological studies are warranted.

The Trust has determined that the various alternatives described in the draft EIS could potentially effect historic properties. The only alternative that would not cause an adverse effect would be the No Action Alternative. Specifically, Alternatives A and B both involve the demolition of FOB-4 (PG-75A-24) a National Register eligible building. Alternative A involves the incorporation of FOB-3 (PG-75A-22) into a new Census building, and would fill in the character defining wings of this National Register eligible building. While in Alternative B, FOB-3 would remain unchanged, the design and location of the ten to twelve story Census building could be an adverse effect. The Trust does note that the Suitland House (PG-75A-21) remains unaltered in all alternatives.

The choosing of either Alternative A or B would constitute an adverse effect requiring mitigation. An MOA would need to be developed including such possible measures as consultation with the Advisory Council on Historic Preservation, design review by MHT, HABS level documentation of FOB-3 and FOB-4, and those mentioned in the Draft EIS. Please note that MHT finds the No Action Alternative to be the preferred alternative with respect to historic properties.
On page 3-73 of the Draft EIS, it says, "The SFC Historic District was identified by the Maryland Historical Trust in 2000 as eligible for listing on the National Register." While we informally agree that the SFC may be an eligible district, no official determination can be found. It is recommended that GSA either provide a letter from MHT indicating SFC's eligibility or complete an official Determination of Eligibility (DOE) form. DOE forms can be found on MHT's website (www.marylandhistoricaltrust.net) as part of the "Maryland Inventory of Historic Properties Instructions & Forms" package.

Finally, we would like to point out that the most recent version of the Section 106 regulations (36 CFR 800; in effect as of January 11, 2001) should be cited in the text (e.g., p. 3-66: 36 CFR 800.16; pp. 4-77-78: 36 CFR 800.5). Also, the new regulations contain no research exception for adverse effects (cf. p. 4-77). We look forward to working with GSA as it completes the 106 process for this project. If you have any questions or require further information, please contact Dr. Gary Shaffer (archeology, 410-514-7638) or Ms. Tania Georgiou Tully (structures, 410-514-7636).

Sincerely,

Elizabeth J. Cole
Administrator
Project Review and Compliance

EJC/GDS/TGT
200102540
cc: Bob Rosenbush, MDP
    Gary Porter, GSA
    Andrea Mones, GSA
    Susan Pearl, PG Co. HPC
    Nancy Witherell, NCPC
Appendix C – Agency Coordination
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Online Certification Letter

Today's date: 2/10/2020

Project: US General Services Administration (GSA)- Relocation of the Department of Labor's Bureau of Labor Statistics to Suitland Federal Center, Prince George's County, Maryland

Dear Applicant for online certification:

Thank you for using the U.S. Fish and Wildlife Service (Service) Chesapeake Bay Field Office online project review process. By printing this letter in conjunction with your project review package, you are certifying that you have completed the online project review process for the referenced project in accordance with all instructions provided, using the best available information to reach your conclusions. This letter, and the enclosed project review package, completes the review of your project in accordance with the Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended (ESA). This letter also provides information for your project review under the National Environmental Policy Act of 1969 (P.L. 91-190, 42 U.S.C. 4321-4347, 83 Stat. 852), as amended. A copy of this letter and the project review package must be submitted to this office for this certification to be valid. This letter and the project review package will be maintained in our records.

Based on this information and in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.), we certify that except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the project area. Therefore, no Biological Assessment or further section 7 consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. For additional information on threatened or endangered species in Maryland, you should contact the Maryland Wildlife and Heritage Division at (410) 260-8573. For information in Delaware you should contact the Delaware Division of Fish and Wildlife, Wildlife Species Conservation and Research Program at (302) 735-8658. For information in the District of Columbia, you should contact the National Park Service at (202) 339-8309.

The U.S. Fish and Wildlife Service also works with other Federal agencies and states to minimize loss of wetlands, reduce impacts to fish and migratory birds, including bald eagles, and restore habitat for wildlife. Information on these conservation issues and how development projects can avoid affecting these resources can be found on our website (www.fws.gov/chesapeakebay).

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interest in these resources. If you have any questions or need further assistance, please contact Chesapeake Bay Field Office Threatened and Endangered Species program at (410) 573-4527.

Sincerely,

Genevieve LaRouche
Field Supervisor
In Reply Refer To: February 05, 2020
Consultation Code: 05E2CB00-2020-SLI-0533
Event Code: 05E2CB00-2020-E-01375
Project Name: Proposed Relocation of the Bureau of Labor Statistics (BLS) to the Suitland Federal Center

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. This species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered
species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Wetlands


**Project Summary**

Consultation Code: 05E2CB00-2020-SLI-0533

Event Code: 05E2CB00-2020-E-01375

Project Name: Proposed Relocation of the Bureau of Labor Statistics (BLS) to the Suitland Federal Center

Project Type: DEVELOPMENT

Project Description: The U.S. General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) for the relocation of the U.S. Department of Labor’s Bureau of Labor Statistics (BLS) from Postal Square Building located at 2 Massachusetts Avenue, NE, Washington, DC 20002, to Suitland Federal Center (SFC) located at 4600 Silver Hill Road, Suitland, MD 20746.

GSA is proposing to relocate approximately 1,800 BLS employees to the SFC. The proposed BLS relocation project will upgrade existing building systems, renovate office space, and improve exterior land uses to support the co-location of three Federal agencies, namely BLS, U.S. Bureau of Economic Analysis (BEA), and the U.S. Census Bureau (Census) within the SFC. The proposed action is intended to provide an efficient interior design that reduces Census’ and BEA’s building footprints and allows for BLS’ backfill of approximately 367,000 rentable square feet (RSF) at the SFC.

Project Location:

Approximate location of the project can be viewed in Google Maps: [https://www.google.com/maps/place/38.84973481342694N76.93504820431697W](https://www.google.com/maps/place/38.84973481342694N76.93504820431697W)
Counties: Prince George's, MD
Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Chesapeake Bay Ecological Services Field Office
177 Admiral Cochrane Drive
Annapolis, MD 21401-7307
(410) 573-4599
Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries\(^1\), as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. **NOAA Fisheries**, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Mammals

<table>
<thead>
<tr>
<th>NAME</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Long-eared Bat <em>Myotis septentrionalis</em></td>
<td>Threatened</td>
</tr>
</tbody>
</table>

This species only needs to be considered under the following conditions:

- Projects with a *federal* nexus that have tree clearing = to or > 15 acres:
  1. REQUEST A SPECIES LIST
  2. NEXT STEP: EVALUATE DETERMINATION KEYS
  3. SELECT EVALUATE under the Northern Long-Eared Bat (NLEB) Consultation and 4(d) Rule Consistency key

Species profile: [https://ecos.fws.gov/ecp/species/9045](https://ecos.fws.gov/ecp/species/9045)

### Critical habitats

**THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.**
USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.
Wetlands

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER FORESTED/SHRUB WETLAND
  - PFO1A

FRESHWATER POND
  - PUBHh
  - PUBHx
February 28, 2020

Mr. Marshall Popkin
U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405

RE: Environmental Review for Proposed Relocation of the Bureau of Labor Statistics to the Suitland Federal Center - 4600 Silver Hill Road, Suitland, Prince George’s County, Maryland.

Dear Mr. Popkin:

The Wildlife and Heritage Service has determined that there are no official State or Federal records for listed plant or animal species within the delineated area shown on the map provided. As a result, we have no specific concerns regarding potential impacts or recommendations for protection measures at this time. Please let us know however if the limits of proposed disturbance or overall site boundaries change and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne,
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER# 2020.0187.pg
Prince George’s County, Maryland

Dear Ms. Byrne:

The U.S. General Services Administration (GSA) is preparing an Environmental Assessment (EA) for the proposed relocation of the U.S. Department of Labor’s Bureau of Labor Statistics (BLS) to the Suitland Federal Center (SFC) at 4600 Silver Hill Road, Suitland, MD 20746. GSA is proposing to relocate approximately 1,800 BLS employees to the SFC. The proposed BLS relocation project will upgrade existing building systems, renovate interior office space, and improve exterior land uses to support the co-location of three federal agencies, namely BLS, U.S. Bureau of Economic Analysis, and the U.S. Census Bureau within the SFC.

GSA is currently conducting background research and studies to identify environmental, cultural, and socioeconomic resources to be considered in advance of the EA. **Please accept this letter as a request for your assistance in identifying any known resources of concern to the Service, specifically state-listed threatened or endangered plant or animal species and/or unique habitats, as well as the existence of any known bat hibernacula or maternity roost trees, in the vicinity of the Suitland Federal Center.** A site vicinity map is included for your reference.

Comments may be emailed to marshall.popkin@gsa.gov. If you have any questions or need additional information regarding this request, please contact me by email or at 202-919-0026.

Regards,

Marshall Popkin
February 11, 2020

Attention: Ms. Heather Nelson
Maryland Federal Consistency Coordinator
Wetlands and Waterways Program
Water Management Administration
Maryland Department of the Environment
Sent via email to hnelson@maryland.gov

Reference: Coastal Zone Management Act Federal Consistency Determination
Proposed Relocation of the Bureau of Labor Statistics to the Suitland Federal Center
Prince George's County, Maryland

Dear Ms. Nelson:

The U.S. General Services Administration (GSA) is proposing to relocate the U.S. Department of Labor’s Bureau of Labor Statistics (BLS) to the Suitland Federal Center (SFC) at 4600 Silver Hill Road, Suitland, MD 20746. GSA is proposing to relocate approximately 1,800 BLS employees to the SFC. The proposed BLS relocation project will upgrade existing building systems, renovate interior office space, and improve exterior land uses to support the co-location of three federal agencies, namely BLS, U.S. Bureau of Economic Analysis, and the U.S. Census Bureau within the SFC at the existing U.S. Census Building.

The SFC is in Prince George’s County within Maryland’s Coastal Zone. A site vicinity map is included for your reference. The BLS relocation project is a federal development project that is therefore subject to a federal consistency review in accordance with the enforceable coastal policies of Maryland’s federally approved Coastal Zone Management Program (CZMP). Please accept this letter as documentation intended to demonstrate that the project is federally consistent with Maryland’s CZMP.

Applicable Maryland Enforceable Coastal Policies

The following Maryland enforceable coastal policies are applicable to the proposed development project. Each applicable policy and a brief policy summary are provided, followed by an explanation of how the project is consistent with the policy. For policies not identified, it was determined that they were not applicable to this project.

General Policies

Core Policy 1
The BLS relocation is not anticipated to have noticeable impacts to air quality. BLS employees would commute to SFC instead of the Postal Square Building in Washington, DC. Any increase in the use of personal vehicles by BLS employees to make the commute would likely be offset by use of the Metro. In addition, BLS employees would be accommodated by existing facilities at the U.S. Census Building. Building system upgrades may be necessary to support the additional employees, but GSA would ensure modern, energy-efficient upgrades are made that would minimize emissions. Therefore, the proposed BLS relocation is consistent with this enforceable coastal policy.

Core Policy 11
In the event exterior work requires earth disturbance of 5,000 square feet or more (or 100 cubic yards or more), GSA would prepare a detailed Erosion and Sedimentation Control Plan prior to construction in accordance with Maryland’s Erosion Control Law and using practices from MDE’s 2011 Standards and Specifications for Soil Erosion and Sediment Control. Development of this plan, with review and approval by the Prince George’s County Soil Conservation District, would
ensure that appropriate measures are employed to contain sediments within the project site. Following construction, natural stabilization methods would be used in disturbed areas to prevent erosion, promote infiltration of stormwater, and minimize invasive species establishment. Therefore, the proposed BLS relocation is consistent with this enforceable coastal policy.

**Water Quality**

**Policies 2, 4, 5, 6, and 8**
GSA would ensure the proposed BLS relocation would not violate any federal, state, or local laws and regulations established to protect water quality. To ensure consistency with policies 2, 4, 5, 6, and 8, GSA would implement erosion and sediment controls to minimize soil erosion and transport into Maryland and District waterways should exterior work require earth disturbance of 5,000 square feet or more (i.e., 100 cubic yards or more). Permanent stormwater best management practices (BMPs) would also be incorporated into the design using Maryland’s Stormwater Design Manual (published in 2000 and revised in 2009) if exterior work increases impervious surface requiring stormwater management. All necessary permits would be obtained for any new outlets that would be required. Following construction, natural stabilization methods would be used in disturbed areas to prevent erosion, promote infiltration of stormwater, and minimize invasive species establishment. Therefore, the proposed BLS relocation is consistent with these enforceable coastal policies.

**Flood Hazards**

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps 24033C0230E and 24033C0235E, effective September 16, 2016, the Suitland Federal Center falls within Flood Zone X, which is defined as an area of minimal flood hazard. Therefore, these enforceable policies are not applicable to the proposed BLS relocation.

**Coastal Resources:**

**The Chesapeake and Atlantic Coastal Bays Critical Area**
The project is not located within the Critical Area; therefore, these enforceable policies are not applicable to the proposed BLS relocation.

**Tidal Wetlands**
There are no tidal wetlands in the vicinity of the project site; therefore, these enforceable policies are not applicable to the proposed BLS relocation.

**Nontidal Wetlands**
Nontidal wetlands may exist within woodland preservation areas along the southern boundary of the SFC; however, no work is proposed as part of the BLS relocation that would impact these resources; therefore, these enforceable policies are not applicable.

**Forests**
Woodland preservation areas exist along the southern boundary of the SFC; however, no work is proposed as part of the BLS relocation that would impact these forested areas; therefore, these enforceable policies are not applicable.

**Historical and Archeological Sites**
The Suitland House is the only structure on SFC that has been determined eligible for listing in the National Register of Historic Places. The house is adjacent to the U.S. Census Building and remains from before government ownership of the land. It is anticipated that there will be effects to the Suitland House from the proposed BLS relocation. GSA will consult with the Maryland Historical Trust (MHT) and the designated State Historic Preservation Office (SHPO) to ensure...
that any adverse effects to the Suitland House and archeological resources that may be present within potentially intact soil horizons are avoided, minimized, or mitigated. Therefore, the proposed BLS relocation is consistent with these enforceable coastal policies.

Living Aquatic Resources
No activities are proposed that would directly impact aquatic resources. GSA would implement erosion and sediment controls and stormwater BMPs, if necessary, to minimize indirect impacts to receiving waters. Therefore, the proposed BLS relocation is consistent with these enforceable coastal policies.

Federal Consistency Determination

Based on a review of the proposed projects conformance with Maryland’s enforceable coastal policies, GSA has determined that the development action would be consistent, or consistent to the maximum extent practicable, with Maryland’s CZMP.

We look forward to your comments and/or concurrence with this determination. Your response may be emailed to marshall.popkin@gsa.gov. If you have any questions or need additional information regarding this determination, please contact me by email or at 202-919-0026.

Regards,

Marshall Popkin

Marshall Popkin

NEPA Specialist
Phone: 202 919 0026
Marshall.popkin@gsa.gov
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