



# U.S. Department of Health and Human Services

## Lease Consolidation in Suburban Maryland

### Draft Environmental Assessment

Prepared by:  
**GSA** The U.S. General Services Administration

With Technical Assistance from:  
**Greenhorne & O'Mara, Inc.**

**September 2010**



**Draft****Environmental Assessment**

Responsible Agency:

**U.S. General Services Administration**

National Capital Region

301 7<sup>th</sup> Street, SW

Washington, D.C. 20407

**U.S. Department of Health and Human Services****Lease Consolidation in Suburban Maryland****Abstract**

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U.S. General Services Administration (GSA), National Capital Region, has prepared this Environmental Assessment (EA) for the lease consolidation of U.S. Department of Health and Human Services (HHS) offices in Suburban Maryland. Currently, HHS has several leases throughout Suburban Maryland, resulting in operational inefficiencies. GSA is proposing to acquire space through leasing in order to collocate four of HHS's current leased locations in Suburban Maryland into one leased location to improve functional efficiency. The number of federal employees to be collocated is approximately 2,900. GSA would enter into a lease agreement for up to 935,401 rentable square feet of space. The delineated area for the lease is Suburban Maryland, within Montgomery County and Prince George's County and within three (3) miles driving distance of a Metrorail station. GSA has received multiple offers for sites that are potential locations for the lease consolidation.

The EA has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended. Probable environmental impacts and potential mitigation measures have been identified for five alternative locations for the HHS Lease Consolidation and the No-Action Alternative.

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Comments must be postmarked no later than October 25, 2010.

Questions or comments on the Draft EA should be addressed to:

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## List of Acronyms

<b>ACHP</b>	Advisory Council on Historic Preservation
<b>ACOE</b>	United States Army Corps of Engineers
<b>ACM</b>	Asbestos Containing Material
<b>AM</b>	Ante Meridiem
<b>APE</b>	Area of Potential Effect
<b>AVO</b>	Average Vehicle Occupancy
<b>BMPs</b>	Best Management Practices
<b>CAA</b>	Clean Air Act
<b>CCT</b>	Corridor Cities Transitway
<b>CFR</b>	Code of Federal Regulations
<b>CLV</b>	Critical Lane Volume
<b>C-O</b>	Commercial Office
<b>CO</b>	Carbon Monoxide
<b>CWA</b>	Clean Water Act
<b>CZMA</b>	Coastal Zone Management Act of 1972
<b>DOT</b>	Department of Transportation
<b>EA</b>	Environmental Assessment
<b>EIS</b>	Environmental Impact Statement
<b>EO</b>	Executive Order
<b>EPA</b>	Environmental Protection Agency
<b>ESA</b>	Environmental Site Assessment
<b>ESD</b>	Environmental Site Design
<b>FEMA</b>	Federal Emergency Management Agency
<b>FHWA</b>	Federal Highway Administration
<b>FIRM</b>	Flood Insurance Rate Map

<b>FPPA</b>	Farmland Protection Policy Act
<b>G&amp;O</b>	Greenhorne & O'Mara, Inc.
<b>GSA</b>	General Services Administration
<b>gsf</b>	gross square footage
<b>HHS</b>	U.S. Department of Health and Human Services
<b>HRSA</b>	Health Resources and Services Administration
<b>HVAC</b>	Heat, Ventilation, Air Conditioning
<b>ICC</b>	Intercounty Connector
<b>ISC</b>	Interagency Security Committee
<b>IWG</b>	Interagency Federal Working Group
<b>LEED®</b>	Leadership in Energy and Environmental Design
<b>LOA</b>	Letter of Authorization
<b>LOS</b>	Level of Service
<b>MAC</b>	Major Activity Center
<b>MARC</b>	Maryland Rail Commuter Service
<b>MBTA</b>	Migratory Bird Treaty Act
<b>MDE</b>	Maryland Department of Environment
<b>MDNR</b>	Maryland Department of Natural Resources
<b>MHT</b>	Maryland Historical Trust
<b>M-NCPPC</b>	Maryland National Capitol Park and Planning Commission
<b>mph</b>	miles per hour
<b>MSAT</b>	Mobile Source Air Toxics
<b>M-U-I</b>	Mixed-use Infill
<b>MWCOG</b>	Metropolitan Washington Council of Governments
<b>MXE</b>	Mixed-use Employment
<b>M-X-T</b>	Mixed-use Transportation Oriented

<b>NAAQS</b>	National Ambient Air Quality Standards
<b>NEPA</b>	National Environmental Policy Act
<b>NESCA</b>	Nongame and Endangered Species Conservation Act
<b>NHPS</b>	National Historic Preservation Act
<b>NO<sub>x</sub></b>	Nitrogen Oxide
<b>NO<sub>2</sub></b>	Nitrogen Dioxide
<b>NRCS</b>	Natural Resources Conservation Service
<b>NRHP</b>	National Register of Historic Places
<b>NWI</b>	National Wetland Inventory
<b>O<sub>3</sub></b>	Ozone
<b>OCPCases</b>	Oil Control Program Cases
<b>Pb</b>	Lead
<b>PD</b>	Principally Mixed-use Residential and Commercial Development
<b>PEPCO</b>	Potomac Electric Power Company
<b>PM<sub>2.5</sub></b>	Fine Particulate Matter (particles with a diameter 2.5 micrometers and smaller)
<b>PM<sub>10</sub></b>	Particulate Matter (particles with a diameter of 10 micrometers or less)
<b>R-10</b>	Multi-family High Density
<b>R-18</b>	Multi-family Medium Density
<b>R-55</b>	Single-family, Small-lot Residential Subdivision
<b>REC</b>	Recognized Environmental Conditions
<b>rsf</b>	Rentable Square Feet
<b>SF</b>	Square Feet
<b>SFO</b>	Solicitation for Offers
<b>SHA</b>	State Highway Administration
<b>SHPO</b>	State Historic Preservation Office
<b>SIP</b>	State Implementation Plan

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<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>SORRT</b>	Smart Organizations Reduce and Recycle Tons
<b>T-D-O</b>	Transit District Overlay
<b>TDOZ</b>	Transit District Overlay Zone
<b>TMP</b>	Transportation Management Plan
<b>TMX-2</b>	Transit Mixed-Use
<b>USDA</b>	United States Department of Agriculture
<b>FWS</b>	United States Fish and Wildlife Service
<b>USGBC</b>	U.S. Green Building Council
<b>UST</b>	Underground Storage Tank
<b>WMATA</b>	Washington Metropolitan Area Transit Authority
<b>WSSC</b>	Washington Suburban Sanitary Commission

## 1.0 Introduction

The U.S. General Services Administration (GSA) is preparing this Environmental Assessment (EA) to assess and report potential impacts resulting from the proposed lease consolidation of the U.S. Department of Health and Human Services (HHS) in Suburban Maryland.

The National Environmental Policy Act (NEPA) requires federal agencies to prepare an EA to determine if an action has the potential to significantly affect the quality of the human environment. GSA has prepared this report to disclose to the public the potential environmental impacts that the lease consolidation of HHS in Suburban Maryland may have on the human environment, including, impacts to natural resources such as air and water quality, social resources such as community services and facilities, and cultural resources such as historic buildings.

In addition, GSA is integrating the Section 106 consultation process as required by the National Historic Preservation Act (NHPA) with the NEPA process. GSA is using this EA to provide information regarding potential adverse effects on historic resources that may result from the proposed lease consolidation of HHS in Suburban Maryland.

The public is encouraged to review this document to learn more about the proposed HHS lease consolidation and its potential impacts. The public is also encouraged to provide comments on the Draft EA.

**Written comments on the Draft EA may be sent to:**

Ms. Suzanne Hill, NEPA Program Specialist  
U.S. General Services Administration  
National Capital Region  
301 7th Street, SW, Room 7600  
Washington, D.C. 20407

**Comments on the Draft EA must be postmarked by October 25, 2010.**

## 1.1 What is GSA Proposing?

U.S. General Services Administration (GSA), National Capital Region, has prepared this Environmental Assessment (EA) for the lease consolidation of U.S. Department of Health and Human Services (HHS) offices in Suburban Maryland. Currently, HHS has several leases throughout Suburban Maryland, resulting in operational inefficiencies. GSA is proposing to acquire space through leasing in order to collocate four of HHS's current leased locations in Suburban Maryland into one leased location to improve functional efficiency. The number of federal employees to be collocated is approximately 2,900. GSA would enter into a lease agreement for up to 935,401 rentable square feet of space. The delineated area for the lease is Suburban Maryland, within Montgomery County and Prince George's County and within three (3) miles driving distance of a Metrorail station.

The leased facility must be located in one location of no more than four buildings and the Federal Government must be the sole tenant. Specifically, if there is more than one building, the proposed consolidation must adhere to the following requirements:

- One of the buildings must house the entire Health Resources and Services Administration (HRSA);
- If there are more than one building offered, the buildings offered can be no more than 50 feet apart and no more than 200 feet between the main entrances of the buildings.
- Each building must follow the most recent Interagency Security Committee's (ISC) Security Standards for Leased Space; and
- Covered and enclosed walkways must connect all buildings.

Other requirements in the Solicitation for Offers (SFO) include:

- The buildings must meet the requirements of Leadership in Energy and Environmental Design for New Construction (LEED®-NC) Silver level; and
- The buildings must be within three miles driving distance on existing roads of a Metrorail Station. If the buildings are more than 2,500 walkable linear feet from the Metrorail Station, shuttle service would be provided.

In addition, approximately 2,500 square feet (SF) would be reserved for vending facilities in accordance with the Randolph Sheppard Act.

## 1.2 What is the Purpose for the HHS Lease Consolidation in Suburban Maryland?

HHS is currently occupying several leased locations throughout Suburban Maryland. The majority of the leased office space is in the Parklawn Building located at 5600 Fishers Lane in Rockville, Maryland, with smaller offices in three other locations. The purpose of the proposed action is to consolidate HHS components located in the various leased locations into one location in order to provide space that would efficiently and effectively meet the needs of HHS.

## 1.3 What is the Need for the Lease Consolidation of HHS Components in Suburban Maryland?

Space is needed for HHS that will efficiently and effectively support the agency's mission. Efficiency can be obtained by consolidating four of HHS's current leased locations in Suburban Maryland. This collocation would reduce energy consumption, allow support for information technology, attract and retain employees in a consolidated facility, provide necessary security measures, and provide collaboration and cohesiveness amongst HHS components. In addition, through consolidation of the HHS components into one location, the Federal government would reduce expenses that are associated with having multiple leased locations.

## 1.4 Relevant Environmental Laws and Regulations

### 1.4.1 What is NEPA and the NEPA Process?

NEPA is the nation's legislative charter for protection of the environment. NEPA requires federal agencies to consider environmental impacts of their projects during federal agency planning and decision-making. NEPA requires federal agencies to prepare an EA if the significance of the impacts that may result from the proposed action is unknown. Public involvement is an important part of the NEPA process. Title 40 Code of Federal Regulations (CFR) Part 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." By involving citizens, stakeholder groups, and local, state, and federal agencies, the Federal Government can make better informed decisions.

Title 40 Code of Federal Regulations (CFR) Part 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken."

### NEPA PUBLIC INVOLVEMENT PROCESS

#### Scoping

June 14, 2010 – July 14, 2010

#### Public Review of Draft EA

Fall 2010 (30-day review)

Through the NEPA process, the public has had and will continue to have opportunities to comment on the lease consolidation of the HHS in Suburban Maryland. GSA initiated the public involvement process through the distribution of scoping letters to Federal, State, local agencies, elected officials, homeowners associations, and other interested parties. “Scoping” is a tool for identifying the issues that should be addressed in the EA and Section 106 process (See Section 1.4.2). Scoping allows the public to help define priorities and express stakeholder and community issues to the agency through written comments. Scoping letters invited the public to provide comments regarding the proposed action. The scoping period for the proposed action was open from June 14, 2010 through July 14, 2010. During that time 13 comments were received. Key issues identified during scoping included:

- Impacts of traffic and access to mass transit;
- Viewsheds;
- Stormwater management; and
- Preservation of trees and other natural features.

Comments received during the scoping period were taken into consideration during the development of the EA and GSA is now providing this Draft EA for review and comment. The Draft EA will be made available for a 30-day public comment period.

#### 1.4.2 What is Section 106 of the National Historic Preservation Act?

As with NEPA, Section 106 of the NHPA requires that federal agencies take into account the effects of their actions on historic resources. Under NHPA, GSA must evaluate impacts to any district, site, building, structure, or object listed in or eligible for listing in the National Register of Historic Places (NRHP) that may be affected by the proposed action. Chapter 3, Affected Environment and Impacts to the Human Environment, describes the potential impacts to historic resources.

Section 106 review encourages preservation of historic properties; however, at times, impacts to historic resources cannot be avoided. When the government must impact historic resources, they are required to consult with local and federal agencies responsible for historic preservation, local citizens, and groups with an interest in historic preservation. GSA has initiated consultations with the Maryland Historical Trust (MHT) for this project.

The **National Register of Historic Places** is the nation's official list of cultural resources worthy of preservation. Properties listed in the register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture.

The public will also be allowed to comment on historic preservation issues during the public review period of this EA.

### **1.4.3 What Other Environmental Laws and Regulations are Relevant to This Project?**

GSA must also comply with many statutes, regulations plans, and Executive Orders (EOs) as seen in the following text boxes. GSA is incorporating compliance with these laws and regulations into their project planning and NEPA compliance. In compliance with Section 7 of the Endangered Species Act (ESA), GSA has requested and received information from the U.S. Fish and Wildlife Service (FWS) and the Maryland Department of Natural Resources (MDNR) regarding any known threatened or endangered species or their habitat within the project area. Correspondence can be found in Appendix D.

**STATUTES, REGULATIONS, PLANS, AND EXECUTIVE ORDERS (EOS)****Statutes**

Clean Air Act of 1970 as amended  
Clean Water Act of 1977 as amended  
Comprehensive Environmental Response, Compensation and Liability Act of 1980  
Archaeological Resources Protection Act of 1979  
Endangered Species Act of 1973  
Section 5 of the National Capital Planning Act of 1952  
Resource Conservation and Recovery Act of 1976  
National Energy Conservation Policy Act  
Energy Independence and Security Act  
National Historic Preservation Act

**Regulations**

Council on Environmental Quality Regulations (40 Code of Federal Regulations Parts 1500-1508)  
36 CFR Part 800 – Protection of Historic Properties  
32 CFR Part 229 – Protection of Archaeological Resources: Uniform Regulations  
40 CFR 6, 51, and 93 – Conformity of General Federal Actions to State or Federal Implementation Plans  
33 CFR 320-330 – U.S. Army Corps of Engineers Regulations  
40 CFR Parts 300 through 399 – Hazardous Substance Regulations  
Secretary of the Interior Standards and Guidelines for Archeology and Historic Preservation

**Plans**

Central US 1 Corridor Sector Plan and Section Map Amendment  
City of Rockville Comprehensive Master Plan  
New Carrollton Transportation District Development Plan

**STATUTES, REGULATIONS, PLANS, AND EXECUTIVE ORDERS (EOS) (CONTINUED)*****Plans (cont.)***

Prince George's County Approved General Plan  
Prince George's Plaza Transportation District Development Plan  
Twinbrook Neighborhood Plan

***Executive Orders***

Executive Order 11593 – Protection and Enhancement of the Cultural Environment  
Executive Order 11988 – Floodplain Management  
Executive Order 11990 – Protection of Wetlands  
Executive Order 12898 – Environmental Justice  
Executive Order 13287 – Preserve America  
Executive Order 13327 – Federal Real Property Asset Management  
Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management  
Executive Order 13514 – Federal Leadership in Environmental, Energy, and Economic Performance

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## 2.0 Alternatives Development

### 2.1 How Were the HHS Lease Consolidation Alternatives Determined?

GSA issued a SFO Number 08-011 in 2008, as amended (February 2010). The solicitation outlined the minimum requirements that the Government was seeking for the proposed HHS Lease Consolidation. From this solicitation, five offers were received. Each of the five offered sites are described below and analyzed in this EA.

### 2.2 Alternatives Considered

#### 2.2.1 What is the No-Action Alternative and Why is it Considered?

NEPA requires Federal agencies to consider a No-Action Alternative in their impacts analysis. Evaluating the No-Action Alternative provides a baseline for comparing the environmental impacts of the proposed alternatives for the HHS Lease Consolidation. Under the No-Action Alternative, the lease consolidation of HHS in Suburban Maryland would not occur. HHS would remain in leased space in the Parklawn Building located at 5600 Fishers Lane in Rockville, Maryland and in three other leased locations in Suburban Maryland including 6010 Executive Boulevard, Rock Wall 1 Building, and Silver Spring Center. No improvements to these buildings would occur. Implementation of the No-Action Alternative would not provide HHS with a consolidated and more efficient work environment.

#### 2.2.2 What Action Alternatives Has GSA Evaluated in This Document?

The proposed action assessed in this document is the lease of up to 935,401 rsf of office space for the lease consolidation of HHS in Suburban Maryland, which will yield approximately 784,982 SF of useable area and house approximately 2,900 federal employees. The height and massing of the building(s) would depend on the layout of the selected site. The building must also follow the most current ISC Security Standards for Leased Space.

GSA would utilize the Leadership in Energy and Environmental Design (LEED®) Rating system to apply principles of sustainable design and development to this project. LEED® was developed by the U.S. Green Building Council (USGBC). LEED® consists of a set of prerequisites and credits with specific requirements for obtaining points in order to become a LEED® Green Building. LEED® follows consensus-based voluntary standards for sustainable buildings, while still meeting high-performance expectations. The LEED® rating system grades building plans on sustainable site design, energy savings, water efficiency, CO emissions, indoor air quality, and building materials (USGBC, 2010). The rating scale is scored on a point system with four levels of certification, in order of rating; Certified, Silver, Gold and Platinum. Under any of the action alternatives, the consolidated leased space would be required to achieve a LEED® Silver Rating. This LEED® rating would increase energy conservation and water conservation for both building construction and design.

The EA considers five different sites within Montgomery and Prince George's Counties (see Figure 1). These alternative sites were offered in response to the SFO 08-011 put out by GSA. All five locations are analyzed in further detail in this EA. They are, in alphabetical order:

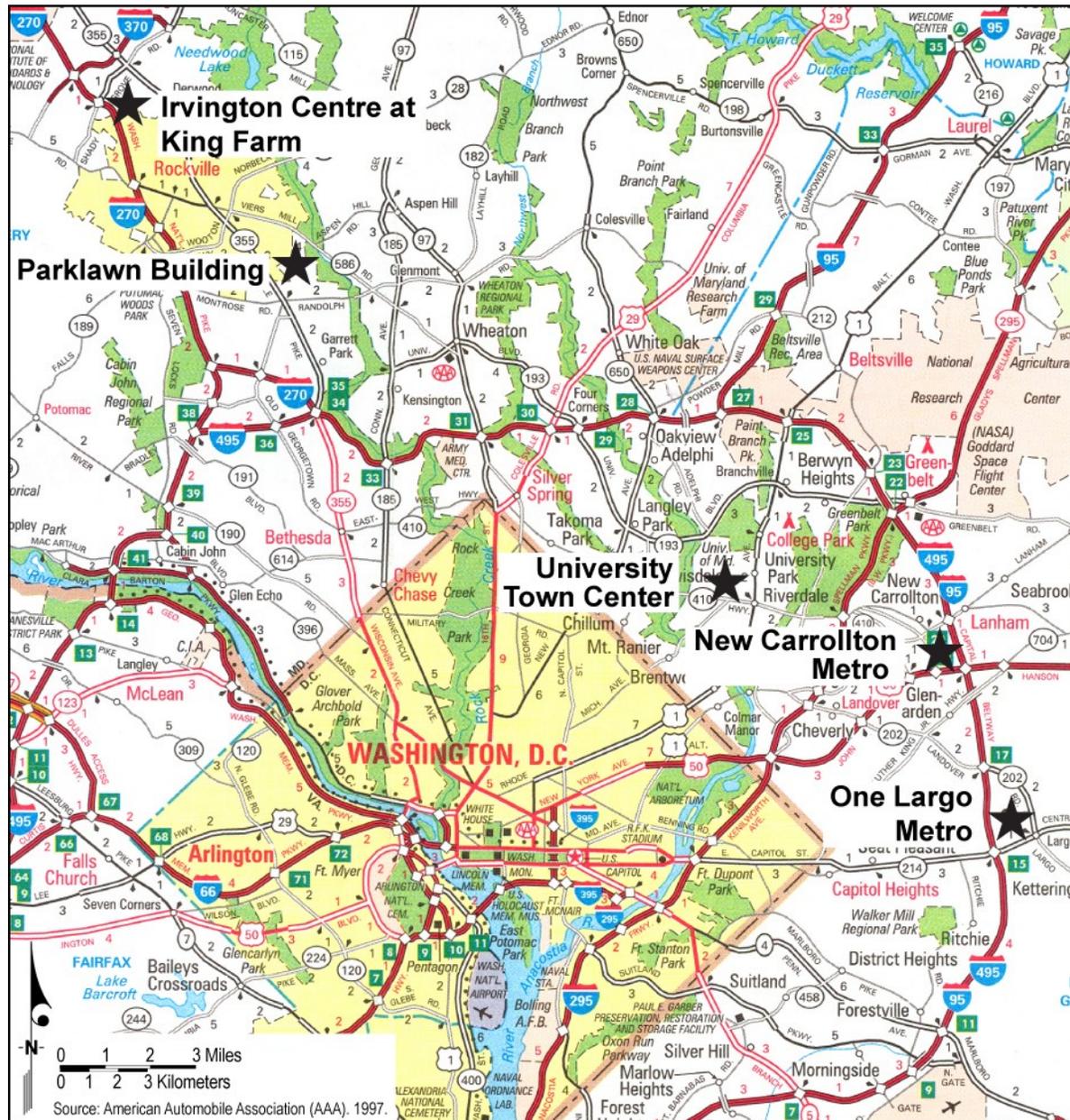


Figure 1. Location Map for Five HHS Lease Consolidation Sites



**Irvington Centre at King Farm Site**



**New Carrollton Metro Site**

*Irvington Centre at King Farm (Action Alternative)*

The Irvington Centre at King Farm (King Farm) site is located in Gaithersburg, Maryland in Montgomery County (See Figure 2). The site is located along King Farm Boulevard and Piccard Drive. The site currently consists of large grass-covered open lots with sparse tree coverage. In addition, the site is located approximately one mile driving distance from the Shady Grove Metrorail Station, which is located on the Red Line. A shuttle service would be provided to bring employees to and from the Shady Grove Metrorail Station. To accommodate the requirements of the SFO, this site would need to be cleared, graded and new building(s) constructed.

*New Carrollton Metro (Action Alternative)*

The New Carrollton Metro site is located in New Carrollton, Maryland in Prince George's County (See Figure 3). The site is bounded by the New Carrollton Metrorail Station to the east, undeveloped land to the south, Ellin Road to the west, and office buildings to the north. The site currently consists of grass vegetation and some mature trees. In addition, the site is located within approximately 900 walkable linear feet of the New Carrollton Metrorail Station, located on the Orange Line. To accommodate the requirements of the SFO, this site would need to be cleared, graded, and new building(s) constructed.

*One Largo Metro (Action Alternative)*

The One Largo Metro site is located in Largo, Maryland in Prince George's County (See Figure 4). The site is bounded by Lottsford Road to the east, Harry S. Truman Drive to the south, and Grand Boulevard to the north. The site currently consists an open lot with few mature trees. In addition, the site is located within approximately 500 walkable linear feet of the Largo Metrorail Station, located on the Blue Line. To accommodate the requirements of the SFO, this site would need to be cleared, graded, and new building(s) constructed.

*Parklawn Building (Action Alternative)*

The Parklawn Building site is located in Rockville, Maryland in Montgomery County (See Figure 5). The site is bounded by Fishers Lane to the north and Parklawn Drive to the south. HHS currently occupies space in the Parklawn Building. The site is located within approximately 2,300 walkable linear feet of the Twinbrook Metrorail Station, located on the Red Line. To accommodate the requirements of the SFO, this site would need to be renovated.

*University Town Center (Action Alternative)*

The University Town Center site is located in Hyattsville, Maryland in Prince George's County (See Figure 6). The site is bounded by Toledo Road to the south, Belcrest Road to the west, and a forested conservation area to the north and east. The site currently consists of a surface parking lot. The site is located approximately 2,300 walkable linear feet from the Prince George's Plaza Metro Station, located on the Green Line. To meet the requirements of SFO 08-011, the surface parking lot would be demolished and the site would be graded and excavated to accommodate construction of new building(s).

**One Largo Metro Site****Parklawn Building Site****University Town Center Site**

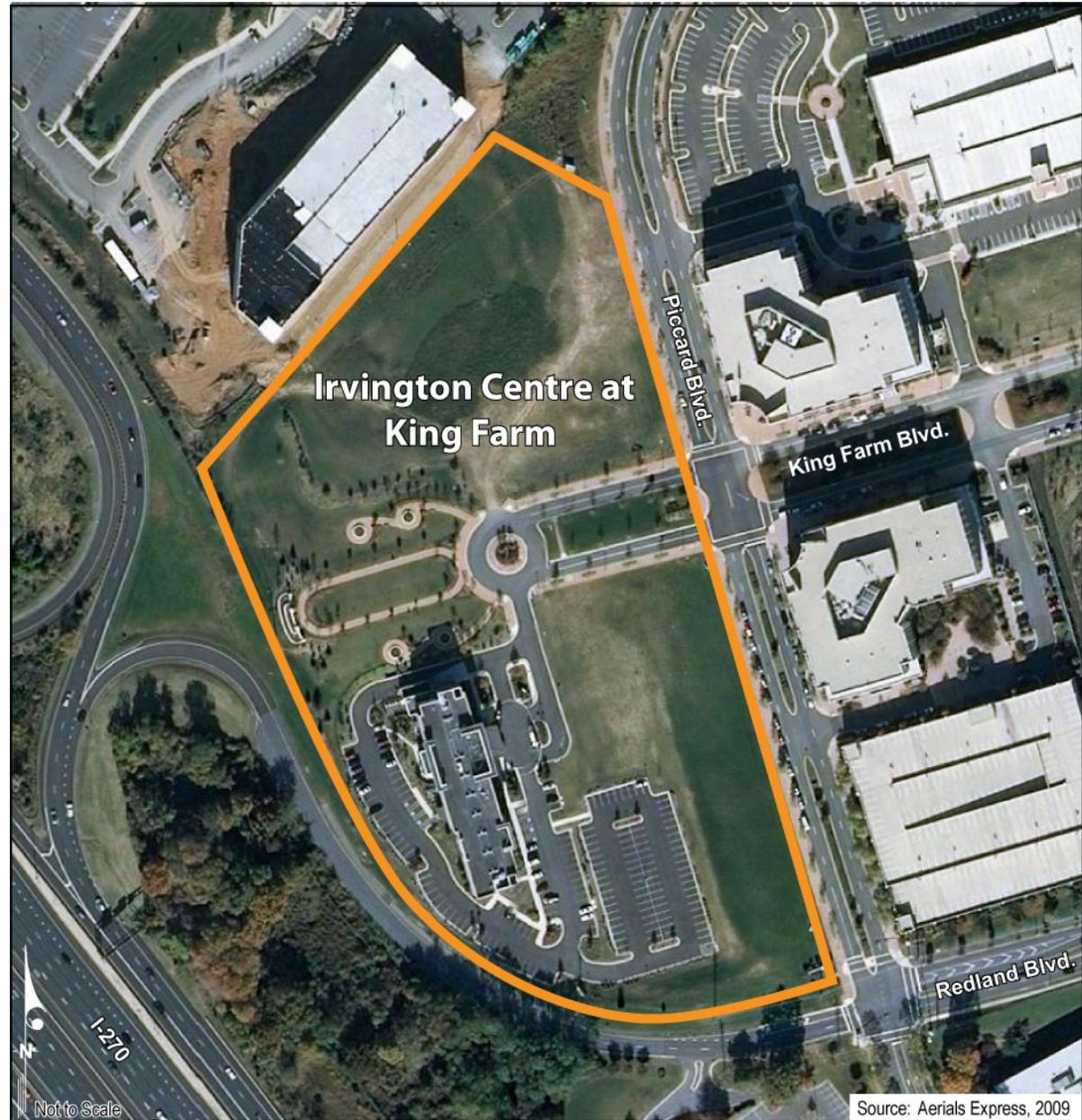


Figure 2. Irvington Centre at King Farm Site Location Map



Figure 3. New Carrollton Metro Site Location Map



tion Map

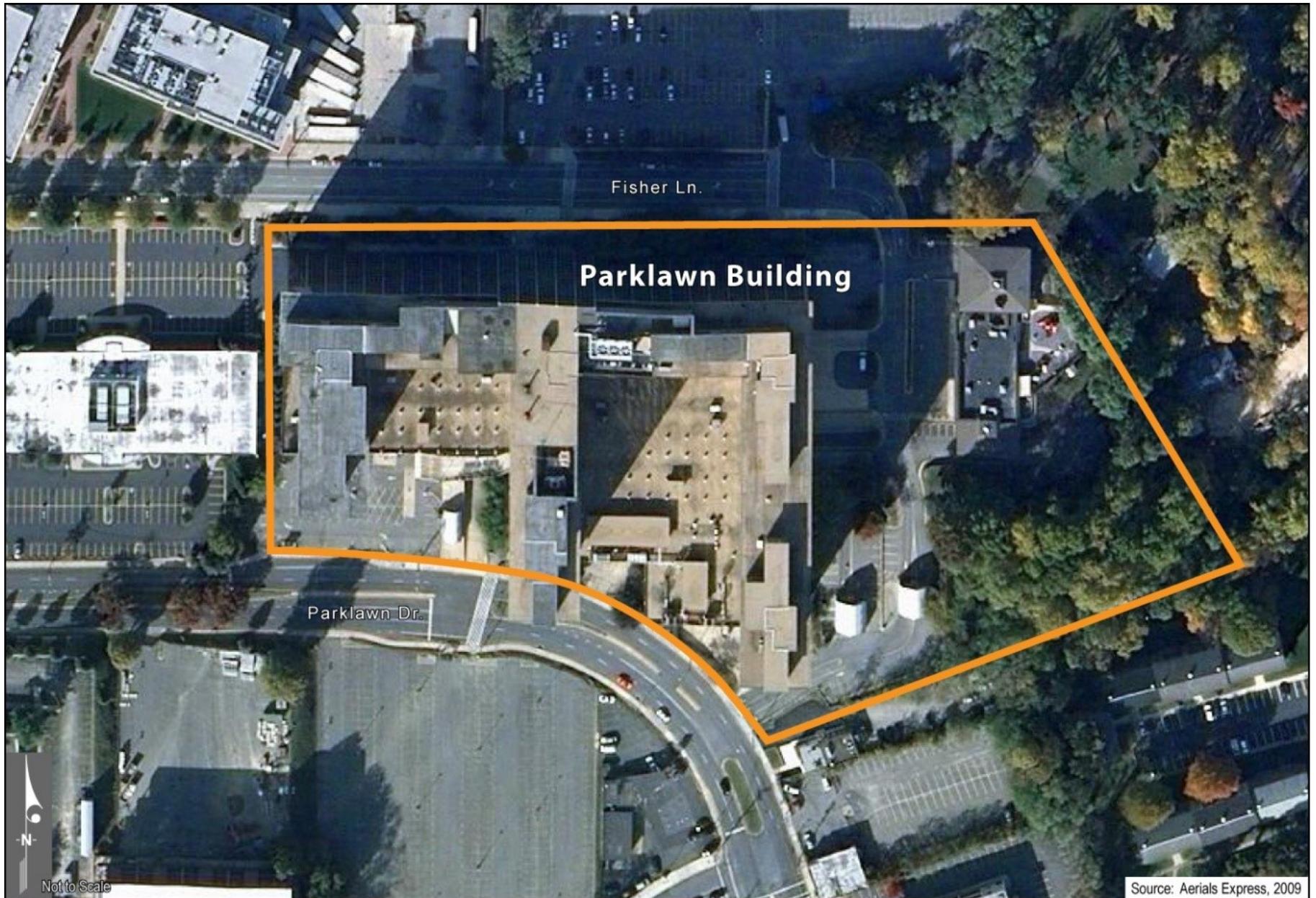


Figure 5. Parklawn Building Site Location Map



Figure 6. University Town Center Site Location Map

## 2.3 What Are the Impacts From Each Alternative?

Table 1 presents, for comparison purposes, a concise summary of each alternative's potential impacts by resource topic, including the No-Action Alternative.

**Table 1. Comparison of Impacts**

	No-Action Alternative	Action Alternatives				
		Irvington Centre at King Farm	New Carrollton Metro	One Largo Metro	Parklawn Building	University Town Center
<b>Soils</b>	There would be no ground disturbing activities; therefore there would be no impacts to soils.	There would be minor, long-term, direct and indirect adverse impacts due to clearing, grading and construction of new building(s).			There would be no ground disturbance therefore there would be no impacts to soils.	There would be minor, long-term, direct and indirect adverse impacts due to clearing, grading and construction of new building(s).
<b>Floodplains</b>	There would be no ground disturbing activities; therefore there would be no impacts to floodplains.	There are no floodplains on-site; therefore there would be no direct impacts to floodplains. Minor, long-term, indirect, adverse impacts would occur to floodplains due to stormwater runoff.			There would be no direct or indirect impacts to floodplains.	Even though a portion of the site is in the floodplain, no direct impacts are anticipated. Minor, long-term, indirect, adverse impacts would occur to floodplains due to stormwater runoff.
<b>Stormwater Management</b>	There would be no ground disturbing activities; therefore there would be no impacts to stormwater management.	An increase in impervious surfaces would add to stormwater management requirements creating a minor, long-term, indirect, adverse impact.			There would be no increase in impervious surfaces resulting in no increase in stormwater flow. A minor, long-term, beneficial impact would occur from increased stormwater management over existing conditions.	A decrease in impervious surfaces would occur creating a minor, long-term, beneficial impact.

**Table 1. Comparison of Impacts**

	No-Action Alternative	Action Alternatives				
		Irvington Centre at King Farm	New Carrollton Metro	One Largo Metro	Parklawn Building	University Town Center
<b>Coastal Zone Management</b>	Because there would be no ground disturbing activities, no impacts to the coastal zone would occur.	This site is not located within Maryland’s coastal zone; therefore, there is no impact.	Construction would not impact sensitive resources of coastal zone and would comply with all applicable federal, state, and local requirements. Therefore minor impacts to the coastal zone would occur and it would be consistent with the Maryland Coastal Zone Management Act.		This site is not located within Maryland’s coastal zone; therefore, there is not impact.	Construction would not impact sensitive resources of coastal zone and would comply with all applicable federal, state, and local requirements. Therefore minor impacts to the coastal zone would occur and it would be consistent with the Maryland Coastal Zone Management Act.
<b>Vegetation &amp; Wildlife</b>	There would be no ground disturbing activities; therefore there would be no impacts to vegetation and wildlife.	There would be a loss of vegetation due to construction of building(s) creating minor, long-term, direct impacts. Negligible, short-term, adverse impacts would occur during construction.		There would be a loss of vegetation due to construction of building(s) creating minor, long-term, direct impacts. Minor, short-term adverse impacts would occur during construction.	There would be no ground disturbing activities; therefore there would be no impacts to vegetation and wildlife.	Negligible, long-term, beneficial impacts would occur from the creation of vegetative areas. However, during construction, negligible, short-term, adverse impacts would occur.
<b>Archeology</b>	There would be no ground disturbing activities; therefore there would be no impacts to archeology.	There is little to no potential for intact archeological resources to be present on-site; therefore, no impacts would occur to archeological resources.	There is a potential to affect archeological resources creating a moderate, long-term, adverse impact.	There is little to no potential for intact archeological resources to be present on-site; therefore, no impacts would occur to archeological resources.	There would be no ground disturbing activities; therefore there would be no impacts to archeology.	There is a slight potential to affect archeological resources creating a minor, long-term, adverse impact.

**Table 1. Comparison of Impacts**

	No-Action Alternative	Action Alternatives				
		Irvington Centre at King Farm	New Carrollton Metro	One Largo Metro	Parklawn Building	University Town Center
<b>Air Quality</b>	There would be no construction activities and no change in emissions. Therefore, there would be no impact to air quality.	Temporary minor to moderate adverse impacts would occur as a result of construction. Increases in traffic would result in minor, long-term, direct, adverse impacts. There would be no appreciable increase in diesel fuel used and the project would be in compliance with the State Implementation Plan (SIP).			Fugitive dust would create a minor, short-term, adverse impact. No additional traffic would be created and there would be no appreciable increase in diesel fuel that is used. The project would be in compliance with the SIP.	Temporary minor to moderate adverse impacts would occur as a result of construction. Increases in traffic would result in minor, long-term, direct, adverse impacts. There would be no appreciable increase in diesel fuel used and the project would be in compliance with the SIP.
<b>Land Use Planning &amp; Zoning</b>	There would be no change in land use or zoning; therefore there would be no impact.	The proposed action is consistent with existing and planned development within Montgomery County.	The proposed action is consistent with existing and planned development within Prince George's County.		The proposed action is consistent with existing and planned development within Montgomery County.	The proposed action is consistent with existing and planned development within Prince George's County.
<b>Economy &amp; Employment</b>	There would be no changed in the local or regional economy.	Beneficial impacts would occur to local businesses. The short-term construction activities would have direct, beneficial, impacts on local economic conditions as employment would increase. Montgomery County and the State of Maryland would see minor, long-term, direct, beneficial impacts from the lease construction. Secondary jobs would create negligible, long-term, beneficial impacts.	Beneficial impacts would occur to local businesses. The short-term construction activities would have direct, beneficial, impacts on local economic conditions as employment would increase. Prince George's County and the State of Maryland would see minor, long-term, direct, beneficial impacts from the lease construction. Secondary jobs would create negligible, long-term, beneficial impacts.		While the collocation of these employees to the Parklawn Building may result in some increase of patronage to area businesses that has not occurred since previous Federal employees vacated the Parklawn Building, the impact would be negligible, short-term, and beneficial.	Beneficial impacts would occur to local businesses. The short-term construction activities would have direct, beneficial, impacts on local economic conditions as employment would increase. Prince George's County and the State of Maryland would see minor, long-term, direct, beneficial impacts from the lease construction. Secondary jobs would create negligible, long-term, beneficial impacts.

**Table 1. Comparison of Impacts**

	No-Action Alternative	Action Alternatives				
		Irvington Centre at King Farm	New Carrollton Metro	One Largo Metro	Parklawn Building	University Town Center
<b>Environmental Justice</b>	There would be no disproportionate impacts to minority and low-income populations.					
<b>Traffic &amp; Transportation</b>	No impacts to traffic and transportation would occur as there would be no change in traffic patterns.	Levels of Service (LOS) would be affected creating a minor, long-term, adverse impact. There would be no changes to Metrorail, Maryland Rail Commuter Service (MARC) rail, or bus systems. Bicycle and pedestrian access would not be affected.	LOS would be affected creating a minor, long-term, adverse impact. There would be no changes to Metrorail, MARC rail, or bus systems. However, these systems would see an increase in patronage, which would create a minor, long-term, adverse impact. Bicycle and pedestrian access would not be affected	No traffic impacts would occur. There would be no changes to Metrorail, MARC rail, or bus systems. Bicycle and pedestrian access would not be affected.	LOS would be affected creating a minor, long-term, adverse impact. There would be no changes to Metrorail, MARC rail, or bus systems. However, these systems would see an increase in patronage, which would create a minor, long-term, adverse impact. Bicycle and pedestrian access would not be affected	
<b>Utilities</b>	No impacts would occur to local utilities as service would remain the same.	All sites would comply with EO 13423 and Energy Independence and Security Act (EISA). The lease consolidation would consume a negligible portion of the total water consumption. Electrical useage would consume a negligible portion of the total energy consumption throughout Potomac Electric Power Company (PEPCO), Allegheny Power, BGE and Washington Gas systems. Small temporary disruptions would occur at all sites except for the Parklawn Building site creating direct and indirect minor, short-term adverse impacts.				
<b>Waste Management</b>	No impacts would occur as waste management would remain the same.	Waste would be generated during construction/renovation creating a negligible, short-term, adverse impact. Under any of the alternatives, the selected site would operate in a waste efficient manner which would reduce the impact to waste management and a recycling program would be established.				

## 2.4 What Mitigation Measure Would Be Implemented Under Each Action Alternative?

The following measures would be implemented by the developer/owner for the HHS Lease Consolidation.

### Soils

For the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center sites, a sediment and erosion control plan and Best Management Practices (BMPs) such as silt fencing and revegetation would be implemented.

### Floodplains

For the University Town Center site, development would have to occur outside the floodplain. A detailed survey of the site plan, clearly indicating the development would occur outside the 100-year floodplain, would be required. The developer/owner would be required to provide GSA with the site plan prior to GSA making a site selection.

### Stormwater Management

For all sites, environmental site design (ESD) measures would be required in the development of stormwater management plans to treat stormwater quantity and quality. Stormwater management plans would need approval of Maryland Department of Environment (MDE).

### Coastal Zone Management

The development of the New Carrollton Metro, One Largo Metro, and University Town Center sites would be required to meet applicable State of Maryland and Prince George's County regulations for protection of the coastal zone. Sediment and erosion control and stormwater management plans would be required to be submitted to the State of Maryland.

### Mitigation includes:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.  
(40 CFR 1508.20)

**Vegetation and Wildlife**

For all sites, only areas cleared for construction would be impacted. Parking of vehicles and equipment in vegetative areas would be restricted. Invasive species would be removed and controlled. Native plant species would be planted in landscaped areas that are revegetated.

For the One Largo Metro site, in addition to the above, a Migratory Bird Permit from FWS Region 5 permitting office would be obtained prior to disturbance at the site for removal of any nests on site.

**Archeology**

For the New Carrollton Metro or the University Town Center site, prior to construction, the project details would be submitted to the Maryland Historical Trust (MHT) and the Maryland-National Capitol Park and Planning Commission (M-NCPPC) to determine if an archeological survey is necessary. If necessary, the survey would be conducted by a qualified professional archeologist. If resources are identified, a Phase II and, if necessary, a Phases III archeological survey would be conducted if requested by MHT and M-NCPPC. If archeological resources are present, then the measures recommended by the MHT and M-NCPPC would be implemented. While the developer/owner would be responsible for conducting the survey should it be required, GSA would be responsible for ensuring coordination with MHT and N-NCPPC.

**Visual Quality**

For all sites, parking garage and site lighting would be shielded to eliminate/reduce spillover beyond the property lines of the respective site. Native vegetation and trees would be provided so that a view surrounding the site would be of a landscape area.

**Air Quality**

For all sites, accepted MDE construction site air quality control measures would be implemented in the handling of materials and as part of any potential demolition or grading activities. Fugitive dust controls and dust abatement/emissions control plan would be implemented. Employees would be encouraged to use public transportation.

**Land Use Planning and Zoning**

No mitigation required.

**Economy and Employment**

No mitigation required.

**Environmental Justice**

No mitigation required.

**Traffic and Transportation**

For all sites, the developer/owner would work with Montgomery or Prince George's Counties and the State of Maryland to implement necessary roadway improvements.

**Utilities**

The selected site would have to operate in a sustainable and energy efficient manner and a minimum rating of Silver on the LEED® scale for building design would be achieved. A water allocation contract would be obtained from Washington Suburban Sanitary Commission (WSSC) for the King Farm, New Carrollton Metro, One Largo Metro, or University Town Center site prior to construction.

**Waste Management**

For all sites, a recycling program would be established.

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## 3.0 Affected Environment and Impacts to the Human Environment

### 3.1 What is the Affected Environment and How Are Impacts Evaluated?

This chapter of the EA describes the existing conditions of the human environment at each of the alternative sites and the impacts the HHS lease consolidation would have on the alternative sites. Each of the alternatives described in Chapter 2.0, Alternatives Development would have varying impacts to natural resources, the social and economic environment, historic resources, and infrastructure (the transportation network and utilities).

Impacts can occur from construction as well as operations of the proposed HHS Lease Consolidation building(s). Impacts can also occur both directly at each of the alternative sites as well as off-site (for instance, employees commuting to the new/renovated building(s) would affect existing traffic on roads surrounding each alternative site). Cumulative impacts from the HHS lease consolidation, when added to other past, present, and future projects are further discussed at the end of this chapter.

Potential impacts are described in terms of:

- *Intensity* - are the effects negligible, minor, moderate, or major;
- *Type* - are the effects beneficial or adverse;
- *Duration* - are the effects short-term, lasting through construction or less than one year, or long-term, lasting more than one year; and
- *Context* - are the effects site-specific, local, or even regional.

The thresholds for the intensity of impacts are defined as follows:

- *Negligible*, when the impact is localized and not measurable at the lowest level of detection;
- *Minor*, when the impact is localized and slight, but detectable;
- *Moderate*, when the impact is readily apparent and appreciable; or
- *Major*, when the impact is severely adverse, significant, and highly noticeable.

#### Impacts include:

**Direct impacts**, which are caused by the action and occur at the same time and place.

**Indirect impacts**, are caused by the action and are later in time or further removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

**Cumulative impacts** result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

(40 CFR 1508.7 and 1508.8)

The effects on the human environment were assessed using best available scientific studies, guidance documents, and information. Resources used to analyze the impacts were obtained from federal, state, and local agencies. These include, but are not limited to, the following:

- U.S. Environmental Protection Agency (EPA) analyses and reports
- U.S. Department of Agriculture (USDA) NRCS Soil Surveys
- Federal Emergency Management Agency (FEMA) Floodplain Maps
- Environmental Site Assessments (ESAs)
- MDE soil erosion and stormwater design manuals
- FWS threatened and endangered species lists
- Maryland DNR threatened and endangered species lists
- Metropolitan Washington Council of Government (MWCOC) reports
- Montgomery County and Prince George's County guidelines
- U.S. Army Corps of Engineers (ACOE) wetland manuals
- Federal Highway Administration (FHWA) traffic guidance

A complete list of references is included at the end of this EA. For resources that required additional analysis, methodologies are summarized later in Chapter 3.

### 3.2 What Resource Issues Have Been Eliminated From Further Analysis?

As with any environmental analysis, there are resource issues that are dismissed from further analysis because the proposed action would cause a negligible or no impact. Negligible impacts are effects that are localized and immeasurable at the lowest level of detection. Therefore, these topics are briefly discussed and then dismissed from further consideration or analysis. These resources are:

- Threatened, Endangered, and Sensitive Species
- Aquatic Biota
- Water Resources
  - Surface Water
  - Wetlands
  - Groundwater, Hydrology, and Quality

- Population and Housing
- Community Facilities and Services
- Cultural Resources
  - Historic Structures and Landscapes
- Noise
- Environmental Contamination
- Security

### 3.2.1 Threatened, Endangered, and Sensitive Species

The Endangered Species Act (ESA) of 1973, and the Nongame and Endangered Species Conservation Act (NESCA) (MDNR § 10-2A-01 – 09) both which focus on protecting the ecosystems on which endangered species depend, are the two laws for rare, threatened, or endangered species in Maryland. GSA contacted the FWS and Maryland DNR for consultation in compliance with Section 7 of the ESA and NESCA.

In a letter dated June 24, 2010, the FWS stated that except for occasional temporary individuals there are no listed endangered or threatened species known to exist on the alternative sites. The USFWS also noted that while not listed as threatened or endangered, the Bald Eagle (*Haliaeetus leucocephalus*) was protected under federal law. During site visits no evidence or observations of Bald Eagles were made. If Bald Eagles are discovered on any of the sites, GSA would require that the developer/owner follow the National Bald Eagle Management Guidelines, dated May 2007 (FWS, 2007). Furthermore, no threatened or endangered species were observed at any of the alternative sites.

In a letter dated, August 11, 2010, the Maryland DNR stated that there are no State or Federal records for rare, threatened or endangered species within the boundaries of the alternatives sites.

Because no known listed or endangered species would be impacted by the proposed actions, threatened, endangered, and sensitive species were dismissed from further analysis in this EA.

### 3.2.2 Aquatic Biota

There are no streams located on-site for any of the alternative sites. The New Carrollton Metro, One Largo Metro, Parklawn Building, and University Town Center alternative sites are near or adjacent to streams, all of which have forested buffers. The University Town Center alternative site

is adjacent to a conservation easement, which acts as a forest buffer to an unnamed stream. The development of the University Town Center site would not impact the conservation easement. No impacts to the aquatic biota in these streams would occur during operation of the facility. Prior to construction activities, a number of mitigation activities would be utilized to limit sedimentation and runoff from the construction site. As a result of the mitigation measures, there would be no impact to off-site streams or the aquatic biota under any of the Action Alternatives. Therefore, aquatic biota impacts were dismissed from further analysis in this EA.

### 3.2.3 Water Resources

#### Surface Water

The U.S. EPA and the U.S. ACOE are responsible for enforcing certain provisions of the Clean Water Act (CWA) (33 U.S.C. §1251 et seq.) which was enacted by Congress "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." One of the mechanisms adopted by Congress to achieve that purpose is a prohibition on the discharge of any pollutants, including dredged or fill material, into "navigable waters" except in compliance with other specified sections of the Act. In most cases, this means compliance with a permit issued pursuant to CWA §402 or §404. The CWA defines the term "discharge of a pollutant" as "any addition of any pollutant to navigable waters from any point source" and provides that "[t]he term 'navigable waters' means the waters of the United States, including the territorial seas[,]" (33 U.S.C. §1362(7), 33 C.F.R. §328.3(a), and 40 C.F.R. §230.3(s))

Because there would be little to no change to surface water resulting from the proposed action, surface water was dismissed from further analysis in this EA. Specific information for surface water resources are briefly summarized below for each site.

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, & Parklawn Building*

Based on field observations conducted in May 2010 and a review of National Wetlands Inventory (NWI) mapping (FWS, 2010), no waters of the U.S. were present on-site at the King Farm, New Carrollton Metro, One Largo Metro, or Parklawn Building sites. Therefore, no impacts to surface waters would occur at any of the four sites.

#### *University Town Center*

The University Town Center site is located in the upper northeast sub-watershed of the Anacostia watershed, which flows into the Potomac drainage basin, a tributary of the Chesapeake Bay. A field

observation conducted in May 2010 confirmed the information obtained in a review of NWI mapping (FWS, 2010). The eastern boundary of the property is lined by a stream, which flows in a southeasterly direction and traverses the Northeast Branch. The stream's northern and southern banks are bordered by forested buffers as protected by a conservation easement. It is anticipated that the proposed construction at the University Town Center site would occur outside the boundary of this easement and no construction or clearing would occur within the riparian buffer of the stream or the stream channel; therefore, would not disturb or impact this easement. Based on the information obtained in both field observation and a review of the NWI, the proposed construction activity would not directly impact waters of the U.S. adjacent to the University Town Center site. Indirectly, some surface water in the vicinity of the proposed HHS Lease Consolidation site could be impacted by runoff during construction. Implementing BMPs during construction, including a sediment and erosion control plan and stormwater management practices would manage the quality and quantity of water flowing into adjacent streams; therefore, there would be a negligible change to the water quality and quantity flowing to this stream.

### **Wetlands**

The U.S. ACOE defines wetlands as "areas saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). Wetlands generally include swamps, marshes, bogs, and similar areas. The technical approach for the identification and delineation of wetlands is that, except in certain abnormal situations, evidence of a minimum of one positive wetland indicator from each parameter (hydrology, soil, and vegetation) must be found in order to make a wetland determination.

Based on field observations conducted in May 2010 and a review of the NWI mapping (FWS, 2010), no vegetated wetlands are present at any of the proposed HHS Lease Consolidation sites. Additionally, during the review of mapping and field observations, no vegetated wetlands were observed on adjacent sites. Therefore, wetlands have been eliminated from further study in this EA.

### **Groundwater Hydrology and Quality**

The sites being considered for the HHS Lease Consolidation are located within two physiographic provinces, the Coastal Plain and the Piedmont. The Coastal Plain Province borders the Atlantic Ocean and is generally comprised of flat to seaward-sloping lowland underlain by semi-consolidated and unconsolidated sediments of silt, clay, and sand with minor amounts of lignite, gravel, and

limestone. The Northern Atlantic Coastal Plain aquifer system is generally fed by surface water infiltration and consists of shallow groundwater which generally follows topography of the area (USGS, 1997). USGS quadrangle maps for each alternative are found in Appendix A (Figures A-1 through A-5).

The Piedmont Province forms at the Fall Line of the Piedmont and Coastal Plain Provinces. It is characterized by varied topography including predominantly hard bedrock, crystalline igneous and metamorphic rocks of Paleozoic age. Groundwater in the Piedmont is fed primarily through the infiltration of surface water (USGS, 1997).

The proposed HHS Lease Consolidation would be constructed to meet or exceed all State of Maryland and Montgomery or Prince George's County regulations; as applicable. Stormwater management measures would be incorporated into the construction and operations of each of the potential sites. The developer/owner would be required to comply with the MDE regulations for ESD (COMAR 26.17.02), which would improve stormwater management. Therefore, the effect on groundwater quality would be negligible for the King Farm, New Carrollton Metro, and One Largo Metro sites and would result in increased impervious surface at these offered sites. In the case of the renovated Parklawn Building or the University Town Center sites, which would either result in no change in impervious surface or a decrease in impervious surfaces, there would be minor beneficial impacts to groundwater. Because any resulting adverse impacts to groundwater would be negligible, groundwater hydrology and quality was dismissed from further analysis. More specific information about each of the sites is summarized below.

#### *Irvington Centre at King Farm, New Carrollton Metro, and One Largo Metro*

The King Farm, New Carrollton Metro, and One Largo Metro sites are undeveloped parcels and no impermeable surface area currently exists on these sites. The proposed activity would result in the addition of impermeable surfaces at all of these sites.

#### *Parklawn Building*

The Parklawn Building is an existing office building. It is expected that there would be no change in *impervious surfaces on the site*.

#### *University Town Center*

The University Town Center site is a paved parcel approximately 9.5 acres and utilized as a parking lot for surrounding businesses. It is expected that the impervious surface would be less than current

conditions due to the nature of the proposed project; resulting in a net decrease of impervious surface areas on-site.

### 3.2.4 Population and Housing

Currently, GSA has several leased facilities for HHS throughout Suburban Maryland. The total number of employees to be collocated would represent a temporary increase in daytime population at any of the offered sites. The alternative sites currently under consideration for the lease consolidation of the HHS have no permanent residential populations.

All of the Action Alternatives are located in the local commuting area/duty station as defined by the U.S. Office of Personnel Management (OPM) and would not require the relocation of any HHS employees. Over time, some HHS employees may elect to move closer to the lease consolidation of HHS with implementation of the Action Alternatives, however, it is not possible to quantify the number of employees that would make this transition. Any impacts to population and housing would be negligible and handled by available housing in the area. There are several residential development projects approved and under construction throughout Montgomery and Prince George's Counties; however, none of these developments have been triggered by the HHS Lease Consolidation. In addition, there is no housing on or immediately adjacent to any of the alternative sites that would be directly affected by the proposed action. Therefore, population and housing was not studied in further detail in this EA.

### 3.2.5 Cultural Resources

Section 101(b)(4) of the NEPA, as amended, requires the Federal government to coordinate and plan its actions to "preserve important historic, cultural and natural aspects of our national heritage." The analysis of potential impact to historic and cultural resources is required of Federal agencies by Council of Environmental Quality (CEQ).

CEQ regulations also encourage coordination between NEPA and the environmental planning and review processes required by other federal, state, or local regulations. Like NEPA, Section 106 of the NHPA also requires the evaluation of impacts of federal actions on historic properties eligible for or listed in the NRHP. In addition, Section 800.8(c)(iv) of the NHPA encourages shared public involvement with NEPA, which states the public should be involved in accordance with the agency's published NEPA procedures. The NEPA process is not a substitute for compliance with Section 106,

which requires a formal identification, evaluation, and consultation process subject to review by the SHPO.

Historic maps from the mid-nineteenth century show that all five alternative site locations were rural in nature. The forerunners of several modern roads were present near all five locations with no development other than scattered residences nearby. No Sanborn insurance maps are available for any of the alternative sites.

#### **3.2.5.1 What is the Area of Potential Effect for Each of the Proposed Sites**

Aboveground historic resources both within and in close proximity to the five alternative site locations were assessed to determine the Area of Potential Effects (APE) for each alternative. This was done to identify historic sites listed or eligible for listing in the NRHP and to evaluate the effects of the proposed construction project on those resources. For archeological resources, the APE was defined as the boundaries of each alternative location. For aboveground historic resources, the APE definition provided in 36 CFR 800.16(d) was used: "...the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the *character* or *use* of historic properties, if any such properties exist." Based on this definition, the proposed APE for historic aboveground resources was established as extending from the footprint of the proposed structure to include adjacent properties or structures or other properties that are clearly visible in a direct line of sight from the footprint of the proposed structure and that are located in such proximity that the proposed construction potentially would have a visual effect on the character of the neighboring or nearby structure's setting. The APE's can be found in Appendix C.

Research for historic structures, landscapes, and archeological resources was undertaken at the MHT in June 2010. Additionally, historic maps and previous archeological survey reports were reviewed. Table 2 is compiled from documentation at MHT and includes information on name, address, date of construction, distance to the proposed alternatives, and NRHP designation of each property located within one mile of the proposed alternatives. GSA is currently in consultation with the MHT for compliance with Section 106 of the NHPA, as amended.

**Table 2. Historic Properties Within One Mile of the Proposed Alternatives.**

Action Alternative Site	Index	Name	Address	Date	Distance	Designation
Irvington Centre at King Farm	M: 20-12	Fields-King Farm	Fields Rd.	circa 1860	3,500' east	Not Evaluated (removed from atlas)
	M: 20-13	Watkins Farmhouse	Fields Rd.	1885	3,500' east	Not Evaluated (removed from atlas)
	M: 20-15	Gaither-Howes House	9401 Gaither Rd.	19th century	4,700' northwest	Not Evaluated (removed from atlas)
	M: 20-18	Thompson House	15304 Shady Grove Rd.	19th century	4,200' southwest	Not Eligible (removed from atlas)
	M: 20-31	Allen Selby House	14843 Shady Grove Rd.	Late 19th century	5,000' southwest	Not Eligible
	M: 20-32	Graff/King Property	16100-16115 Frederick Rd.	circa 1920s/1930s	3,400' northeast	NRHP Eligible
	M: 20-33	Bridge	No documentation on file	No documentation on file	No documentation on file	No documentation on file
	M: 20-36	Clarence O. and Helen V. Crown Property	16101 Shady Grove Rd.	circa 1940	2,750' north	Not Eligible
	M: 21-181	Michael and Anna Zetts Property	8600 Zetts Ave.	1935	2,750' north	Not Eligible
	M: 21-183	Casey Barn	810 S. Frederick Ave.	Early 20th century	4,600' north	NRHP Eligible

Action Alternative Site	Index	Name	Address	Date	Distance	Designation
New Carrollton Metro	PG:69-000	No documentation on file	No documentation on file	No documentation on file	No documentation on file	Not Evaluated
	PG:69-17	Wormley House	7533 Ardwick-Ardmore Rd.	circa 1898 and 1926	2,200' west	Not Evaluated
	PG:69-23	Ardwick Historic Community	Not specified	Not specified	Alternative is within the community boundaries	Not Evaluated
	PG:72-26	Town of Glenarden	Multiple	20th century	3,500' east	Not Eligible
	PG:72-55	7941 Piedmont Ave.	7941 Piedmont Ave.	Early 20th century	3,200' southeast	Not Eligible
	PG:72-57	Feliciano Property	3504 Watkins Ave.	circa 1920/1930	4,000' southeast	Not Eligible
	PG:72-65	No documentation on file	No documentation on file	No documentation on file	No documentation on file	Not Evaluated
One Largo Metro	PG:72-4	Waring's Grove	900 Brightseat Rd.	18th – 20th century	3,000' west	NRHP Eligible
	PG:72-5	Ridgely Methodist Church	8900 Central Ave.	1921	3,700' southwest	NRHP Listed
	PG:72-30	Joseph S. Schwalier House	504 Brightseat Rd.	1930s	2,500' west	Not Eligible
	PG:72-31	Charles E. and Marcy C. Summers House	500 Brightseat Rd.	circa 1930	2,500' west	Not Eligible
	PG:72-56	Summers Acres	334-416 Brightseat Rd.	No documentation on file	2,400' southwest	Not Eligible
	PG:73-10	Addison Farm	McCormick Dr. and Peppercorn Pl.	19th century	4,300' north	Demolished
	PG:73-13	Graden	9900 Central Ave.	circa 1865	2,500' southeast	Not Evaluated

Action Alternative Site	Index	Name	Address	Date	Distance	Designation
Parklawn Building	M: 26-21-2	Tyson Wheeler Funeral Home	1331 Rockville Pike	1899	5,100' northwest	Not Evaluated
	M: 26-21-3	Halpine Store	1600 Rockville Pike	Post-1923	3,400' northwest	Not Evaluated
	M: 26-21-4	Sprigg-Poole House	1300 Rockville Pike	circa 1900	5,100' northwest	Not Evaluated (removed from atlas)
	M: 26-21-5	Dixie Cream Donut Shot	1402 Rockville Pike	1660s	4,900' northwest	Not Evaluated
	M: 26-21-6	Congressional Shopping Plaza	Rockville Pike	circa 1930, 1959	4,000' west	Not Evaluated
	M: 26-25	Twinbrook Area	Multiple	1948-1954	4,100' northwest	Not Evaluated
	M: 27-19	Original Veirs Mill Site	Viers Mill Rd.	1838	1,800' northeast	Not Evaluated
	M: 30-1	Parklawn Cemetery/Wilkins Estate	12800 Viers Mill Rd.	Early 20th century	Adjacent to northeast	Not Evaluated
	M: 30-2	Montrose Schoolhouse	5721 Randolph Rd.	1909	3,400' southwest	NRHP Listed
	M: 30-3	Gaegler House Site	12190 Rockville Pike	circa 1860	3,400' south	Demolished
	M: 30-9	Montouri Estate	11609 Rockville Pike	circa 1920	4,700' south	Not Eligible
M: 37-16	Metropolitan Branch, B&O Railroad	Not Applicable	1866+	3,400' southeast	NRHP Eligible	

Action Alternative Site	Index	Name	Address	Date	Distance	Designation
University Town Center	PG:66-5	Bloomfield	6404 Queens Chapel Rd.	circa 1814	2,000' east	Not Evaluated
	PG:68-1E	Hitching Post Hill	3308 Rosemary Lane	circa 1840	3,200' northwest	Not Evaluated
	PG:68-68	Thrift House	6304 47th Ave.	circa 1895	5,000' east	Not Evaluated
	PG:68-69	Grimes-Clayton House	6304 46th Ave.	1919	5,000' east	Not Evaluated
	PG:68-76	Freeman House	6122 42nd Ave.	circa 1912	3,300' southeast	Not Evaluated
	PG:68-94	3903 Nicholson St.	3903 Nicholson St.	Early 20th century	3,800' south	Not Eligible
	Calvert Hills HD	Multiple (PG:66-37)	Multiple	Late 19th/Early 20th century	4,000-5,000' feet east	NRHP Listed
	Hyattsville HD	Multiple (PG:68-10)	Multiple	Late 19th/Early 20th century	4,000'-5,000' southeast	NRHP Listed
	Riverdale Park HD	Multiple (PG:68-4)	Multiple	Late 19th/Early 20th century	4,000'-5,000' east	NRHP Listed
	University Park HD	Multiple (PG:66-29)	Multiple	Late 19th/Early 20th century	4,000'-5,000' east	NRHP Listed
	West Riverdale HD	Multiple (PG:68-93)	Multiple	Late 19th/Early 20th century	4,000-5,000' feet east	NRHP Listed

### 3.2.5.2 Historic Structures and Landscapes

#### *Irvington Centre at King Farm (Action Alternative)*

Neither nineteenth-century atlases nor twentieth-century topographic maps show any structures at the proposed King Farm site. Ten historic properties have been recorded within one mile of this alternative (Table 2 Historic Properties Within One Mile of the Proposed Alternatives). Four of the ten properties were previously determined to be not eligible for NRHP listing (M: 20-18, M: 20-31, M: 20-36, and M: 21-181). Three of the ten properties (M: 20-12, M: 20-13, and M: 20-15), while not formally evaluated for the NRHP, were found not suitable for regulation under the Historic

Preservation Ordinance and removed from the *Montgomery County Locational Atlas and Index of Historic Sites* (M-NCPPC, 1976) in the 1980s. Two of the ten historic properties (M: 20-32 and M: 21-183) have been determined eligible for listing in the NRHP. The final property (M: 20-33), a bridge, has no documentation on file.

The lease consolidation of HHS at the King Farm site would be consistent with the surrounding existing development. The viewshed of the three remaining properties, including the bridge with no documentation available (M: 20-33) and the two properties determined eligible for NRHP listing (M: 20-32 and M: 21-183), would not be altered by construction of the King Farm alternative site. The present-day viewshed of these three properties includes modern (post-1990) construction consisting of multi-story offices, commercial buildings, parking lots and structures, and residential structures. Therefore, there would be no additional impacts to historic properties under this alternative.

#### *New Carrollton Metro (Action Alternative)*

No structures are depicted on nineteenth-century atlases within the New Carrollton Metro site. A structure first appears at this location on the 1951 Washington East 7.5-minute topographic map and remains on later versions. Seven historic properties have been recorded within one mile of this alternative (Table 2 Historic Properties Within One Mile of the Proposed Alternatives). Three of these properties have been determined not to be eligible for listing in the NRHP (PG:72-26, PG:72-55, and PG:72-57). The remaining four properties are unevaluated (PG:69-000, PG:69-17, PG:69-23, and PG:72-65). Two of these (PG:69-000 and PG:72-65) lack documentation in the MHT files, and it is unclear whether they are in the New Carrollton Metro APE. The Wormley House (PG:69-17) has the potential to be within the New Carrollton Metro APE. In addition, this alternative appears to be within the Ardwick Historic Community (PG:69-23); however, no formal boundaries have been defined for the Ardwick Historic Community. Based on the information in the Maryland Inventory of Historic Properties at MHT, the historic community would appear to include the residences around the Wormley House.

The Wormley House is approximately 2,200 feet west of the proposed New Carrollton Metro site. The intervening distance contains a significant cover of mature trees, Veterans Parkway, and a residential subdivision. Given these factors, it is unlikely that the viewshed of the Wormley House and Ardwick Historic Community would be significantly altered by construction of the New

Carrollton Metro site, even though a tall building is likely to be developed for this alternative site. Therefore, there would be no additional impacts to historic properties under this alternative.

#### *One Largo Metro (Action Alternative)*

No structures are illustrated on nineteenth-century atlases or twentieth-century topographic maps within the One Largo Metro site. Seven historic properties have been recorded within one mile of this alternative (Table 2 Historic Properties Within One Mile of the Proposed Alternatives). Three of the seven properties were previously determined not to be eligible for listing in the NRHP (PG:72-30, PG:72-31, and PG:72-56). Two of the seven properties have not been evaluated for NRHP eligibility (PG:73-10 and PG:73-13), however, PG:73-10 was previously demolished. One of the seven properties (PG:72-4) has been determined to be NRHP eligible, and one of the seven properties (PG:72-5) is listed in the NRHP.

The lease consolidation at the One Largo Metro site would be consistent with the surrounding existing development. The viewshed of the three closest properties (unevaluated PG:73-13, NRHP-eligible PG:72-4, and NRHP-listed PG:72-5) would not be significantly altered by construction at the One Largo Metro site. The present-day viewshed of these three properties includes modern (post-1990) construction consisting of multi-story offices, commercial buildings, parking lots and structures, and residential structures. Therefore, there would be no additional impacts to historic properties under this alternative.

#### *Parklawn Building (Action Alternative)*

Neither nineteenth-century atlases nor middle twentieth-century topographic maps show any structures in the Parklawn Building alternative site prior to construction of the existing building at 5600 Fishers Lane. Twelve historic properties have been recorded within one mile of this alternative (Table 2 Historic Properties Within One Mile of the Proposed Alternatives). One property (M: 30-9) has been determined not to be eligible for listing in the NRHP. One property, the Montrose Schoolhouse (M: 30-2), is listed in the NRHP. Another property, the Metropolitan Branch of the B&O Railroad (M: 37-16), has been determined to be eligible for listing in the NRHP. The remaining nine properties are unevaluated (M: 26-21-2, M: 26-21-3, M: 26-21-4, M: 26-21-5, M: 26-21-6, M: 25-26, M: 27-19, M: 30-1, and M: 30-3).

Only one of the properties, the Wilkins Estate/Parklawn Cemetery (M: 30-1), is within the Parklawn Building APE. Since this alternative entails the renovation of the existing facility, in keeping with

existing development, this property would not be impacted by the proposed project. There would be no impacts to historic properties under this alternative.

#### *University Town Center (Action Alternative)*

No structures are illustrated on nineteenth-century atlases within the University Town Center alternative. Six individual historic properties and multiple properties associated with five historic districts have been recorded within one mile of this alternative (Table 2 Historic Properties Within One Mile of the Proposed Alternatives). One of the six individual properties (PG:68-94) has been determined not to be eligible for listing in the NRHP, and the other five (PG:66-5, PG:68-1E, PG:68-68, PG:68-69, and PG:68-76) have not been evaluated for NRHP listing. Portions of the Calvert Hills, Hyattsville, Riverdale Park, University Park, and West Riverdale Historic Districts are located 4,000 to 5,000 feet from the University Town Center site.

The proposed University Town Center alternative site is consistent with the existing development around it. The viewshed of the five unevaluated properties (PG:66-5, PG:68-1E, PG:68-68, PG:68-69; and PG:68-76) and the nearby historic districts would not be significantly altered by construction of the University Town Center alternative site. The present-day viewshed of these five properties and historic districts includes post-1990 construction consisting of multi-story offices, commercial buildings, parking lots and structures, and residential structures. The lease consolidation of HHS at the University Town Center site is in keeping with the character of the University Town Center development. Therefore, there would be no impacts to historic properties under this alternative.

### **3.2.6 Noise**

Noise is regulated at local, state, and federal levels. The Noise Control Act of 1972 authorizes EPA to promulgate regulations establishing maximum permissible noise characteristics for products manufactured for interstate commerce. In addition, EPA was directed to publish information about the kind and extent of effects of various conditions to protect public health and welfare. This information has been used by other Federal agencies in establishing criteria applicable to their programs.

Noise levels at all five alternatives sites are similar and average for developed areas. Current noise sources include: traffic; heat, ventilation, air conditioning (HVAC) units; pedestrians; and nearby Metrorail Stations. If the proposed action occurs at any of the five sites, the primary source of noise would be temporary and associated to construction activities. The operation of the HHS Lease

Consolidation would generate additional noise similar to the current sources at the alternative sites, such as traffic and HVAC units. Because the additional noise would be negligible, except for temporary construction noises, noise was dismissed from further analysis.

### 3.2.7 Environmental Contamination

A Phase I Environmental Site Assessment (ESA) was performed at each of the alternative sites. No Recognized Environmental Conditions (RECs) exist at any of the proposed sites. Therefore, environmental contamination was dismissed from further analysis. More specific information regarding the Phase I ESAs at each of the sites is discussed below.

#### *Irvington Centre at King Farm*

A Phase I ESA was conducted in December 1998 for a 430- acre parcel. The Phase I ESA report encompassed the area of the King Farm site (Loiederman Associates, 1998). The assessment revealed no records, database entries, or visible indications that there were (RECs) on-site. No information is available to determine if there have been RECs on-site within the last 12 years; however, a site visit in 2010 did not show visual signs of dumping or other contamination and the site has not changed ownership during that time period.

#### *New Carrollton Metro*

A Phase I ESA was conducted on the New Carrollton Metro site in March 2008 (Specialized Engineering, 2008). The site was not listed on any databases, did not have any environmental liens, or prior land use that would indicate a REC, or have any other evidence to suggest RECs on-site. Several properties within a half mile were listed on the Oil Control Program Cases (OCP Cases) database; however, none of these were determined to be a REC for the New Carrollton Metro site. No RECs were recognized in association with the New Carrollton Metro site.

#### *One Largo Metro*

A Phase I ESA was conducted in August 2008 on the One Largo Metro site (G&O, 2008). The site was not listed on any databases, did not have any environmental liens, or prior land use that would indicate a REC, or have any other evidence to suggest RECs on-site. An off-site gas station was twice listed in the OCP Cases database. These cases were closed. No identified RECs exist on the One Largo Metro site.

### *Parklawn Building*

A Phase I ESA was conducted for the Parklawn Building site in August of 2009 (Advantage Environmental, 2009). Adjacent to the Parklawn Building site is an underground storage tank (UST) removal case, closed in 2005. Parklawn Mechanical Service located on the opposite side of Parklawn drive, removed a UST from the site in 2003. A spill and cleanup occurred during the removal. Six additional USTs exist on the Parklawn Mechanical Service site.

Three potential historical RECs were noted for the Parklawn Building site. First, the site was formerly listed on the OCP Cases database for a release and cleanup of 800 metric tons of impacted soils, associated with two USTs removed from the site in 1999. Prior soil remediation is a historical REC. Two new USTs, 10,000 gallons and 30,000 gallons, were installed and are currently on-site. The two new tanks are used for the storage of diesel fuel for emergency generators. The new USTs are constructed of fiberglass reinforced plastic. In 2009 the systems were tested, and the installation of a replacement overfill catchment basin was required for the 10,000 gallon tank. Second, according to interviews, the Parklawn Building site was host to labs operated by the HHS, but were moved off-site years ago. The previous lab use is not a REC. Third, prior inspection of the Parklawn Building identified 12 percent chrysotile asbestos in floor tile mastic. Any Asbestos Containing Material (ACM) or other hazardous building materials would need to be properly identified and remediated prior to renovation activities.

The investigation of the Parklawn Building site concluded that no RECs existed on-site, however, petroleum-impacted soils likely exist on-site and future plans to renovate the site would require remediation of ACMs within the building.

### *University Town Center*

In August of 2005, a Phase I ESA was performed on a 12 acre area that includes the University Town Center site (ATC, 2005). The assessment revealed no records, database entries, or visible indications that there were RECs associated with the University Town Center site. No information is available to determine if there have been RECs on site within the last 5 years.

### 3.2.8 Security

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building, & University Town Center*

The safety of HHS employees would be provided by a number of security measures for each of the proposed site alternatives. The site design for all sites would comply with the most recent ISC Security Standards for Leased Space. Due to the security measures that would be implemented at any of the alternative sites, security impacts have been dismissed from further analysis.

### 3.2.9 Public Health and Safety

If the lease consolidation of HHS occurs at any of the proposed alternative sites, emergency services would not change, nor would the operation of the HHS facility put undue stress on these services. All of the alternative sites are included within each county's planning forecast. Emergency services were taken into consideration in the approval of the developments by each of the counties. Furthermore; the HHS lease consolidation at any of the proposed alternative sites is not expected to affect the ability of the local fire and police departments, and area hospitals to provide service to the surrounding residents. Therefore, public health and safety impacts have been dismissed from further analysis.

### 3.2.10 Community Facilities

A wide variety of parks, recreation, community facilities, and open space are present in Montgomery and Prince George's Counties. Montgomery County's park system includes 30,000 acres consisting of community parks, trails, historic sites, and nature centers (Montgomery County, 2010). There are more than 26,000 acres of parkland in Prince George's County, including community parks, trails, historic sites, and other recreational facilities (PGCDPR, 2010a). The trail systems in both counties include walking, bicycling, and horseback riding opportunities. Additionally there are a wide variety of state and federal parks in both counties such as Seneca Creek State Park, Northwest Branch Recreational Park, Patuxent National Wildlife Research Refuge, and the C&O Canal National Historic Park.

The Montgomery County public school system has 131 elementary schools, 38 middle schools, 25 high schools, 1 career and technology center, and 5 special schools. For the 2009-2010 school year, 141,777 students were enrolled in the county (Montgomery County Public Schools [MCPS 2010a]). Prince George's County public school system includes 133 elementary schools, 32 middle schools, 30

high schools, and 15 specialized schools and centers. Enrollment in 2009-2010 was 127,129 (PGCPS, 2010a, b). Both counties also have a number of private schools that service preschool through high school students.

Under the Action Alternatives, the lease consolidation would not remove any existing library, education/child care facility, parks and recreational facility, or religious facility. Nor would it result in a substantial change to community population that would adversely affect library or church capacity. The surrounding child care facilities are able to handle the need for child care services provided by the surrounding daycare facilities. The HHS lease consolidation is not expected to affect their ability to provide service to the surrounding residents. In addition, a child care facility may be provided at each of the sites that would provide child care to Federal employees and would potentially alleviate the need for child care services by the commuting population.

Most of the park and recreation facilities would be only slightly impacted from the consolidation of the HHS at any of these sites. There may be a slight increase in use of community facilities and services, but the existing facilities and services would be able to handle the additional patronage and would not be adversely affected. Overall, the impact to community facilities and services at these sites would be negligible and this resource has been dismissed from detailed analysis.

### 3.3 What Resource Issues Have Been Included For Further Analysis?

As with any environmental analysis, there are resource issues that are analyzed in further detail to compare the environmental consequences of the No-Action and the five Action Alternatives. Each of the alternatives described in Chapter 2 would have varying impacts to natural resources, the social and economic environment, cultural resources, and infrastructure. The resources analyzed in detail in this EA are:

- Soils
- Floodplains
- Stormwater Resources
- Coastal Zone Management
- Vegetation and Wildlife
- Archeology
- Visual Quality
- Air Quality
- Land Use Planning and Zoning
- Economy and Employment

- Environmental Justice
- Traffic and Transportation
- Utilities
- Waste Management

## 3.4 Soils

### 3.4.1 What Are the Soil Conditions at Each of the Proposed Sites?

#### *Irvington Centre at King Farm*

The soils of the King Farm site are predominately Glenelg silt loam, roughly three percent are Baile silt loam (NRCS, 2010) (See Table 3). The site is flat and previously graded. The Glenelg silt loam soils are classified as prime farmland and farmland of statewide importance. Although previously in farm production, the King Farm site was developed in the 1990s. Currently there is a mixed-use development in the broader King Farm site, including office buildings, a hotel, and apartments. The King Farm site is not subject to the requirements of the Farmland Protection Policy Act (FPPA) because an area recognized as prime farmland must be in production of food or fiber to be considered for protection. Urban and developed land, as defined in the FPPA, does not qualify as in production. A soils map for this alternative can be found in Appendix A, Figure A-6.

#### *New Carrollton Metro*

The soils in the New Carrollton Metro site consist of urban complex and highway soils; approximately eight percent are Christiana-Downer-Urban land and approximately 80 percent are Russett-Christian-Urban land (See Table 3). The remaining 12 percent of the site consists of Udorthents. None of these soils on-site are recognized as prime farmland or hydric soils. Slopes on site vary from 0 to 15 percent. A soils map for this alternative can be found in Appendix A, Figure A-7.

#### *One Largo Metro*

The One Largo Metro site is composed of Collington-Wist complex soils (NRCS, 2010). Approximately 15 percent of the One Largo Metro site is composed of Collington-Wist-urban land complex soils (See Table 3). These soils are not hydric. Collington-Wist complex soils vary from 0 to 10 percent slopes, are listed as prime farmland soils, and cover roughly 85 percent of the site. The site is not subject to the requirements of the FPPA because it is a Major Activity Center (MAC), which is an area set aside for a mixture of uses designed to serve the regional residential market or provide concentrated employment (MNCPPC, 2002). Further, an area recognized as prime farmland

### Soil Types

**Loam** - Soil material that is 7 to 27 percent clay particles, 28 to 50 percent silt particles, and less than 52 percent sand particles.

**Silt** - Soil that is 80 percent or more silt and less than 12 percent clay.

**Gravelly soil material** - Material that is 15 to 50 percent by volume, rounded or angular rock fragments, not prominently flattened, up to 3 inches in diameter.

**Urban land** - An area where more than 75 percent of the surface is covered by asphalt, concrete, buildings, or other structures.

must be in production of food or fiber to be considered for protection. Urban and developed land, as defined in the FPPA, does not qualify as in production. A soils map for this alternative can be found in Appendix A, Figure A-8.

#### *Parklawn Building*

Soils of the Parklawn Building site are mapped as urban land (NRCS, 2010) (See Table 3). The Parklawn site does not have any hydric soils nor is it subject to the FPPA. Slopes on the site vary from 0 to 10 percent. A soils map for this alternative can be found in Appendix A, Figure A-9.

#### *University Town Center*

Christiana-Downer-Urban land complex, Issue-Urban land complex, and Urban land-Christiana complex soils make up the University Town Center site (NRCS, 2010) (See Table 3). The soils vary from 0 to 15 percent slopes, though only flat land was observed during site visits in June 2010. The site soils are not considered prime farmland. The Issue-Urban land complex soils are classified as partially hydric. A soils map for this alternative can be found in Appendix A, Figure A-10.

**Table 3. Soil Types, Classifications, and Ratings at the Proposed Sites**

Site	Soil Types	Prime Farmland Soils? (Y/N)	Hydric Rating
Irvington Centre at King Farm	Gleneg silt loam	Y	Partially Hydric
	Balle silt loam	N	Hydric
New Carrollton Metro	Christiana-Downer-Urban land complex	N	Not Hydric
	Russett-Christiana-Urban land complex	N	Not Hydric
	Udorthents, highway	N	Not Hydric
One Largo Metro	Collington-Wist complex	Y	Not Hydric
	Collington-Wist complex-Urban land	N	Not Hydric
Parklawn Building	Urban Land	N	Not Hydric
University Town Center	Christiana-Downer-Urban land complex	N	Not Hydric
	Issue-Urban land complex	N	Partially Hydric
	Urban land-Russett-Christiana complex	N	Not Hydric

### 3.4.2 How Would Soils be Affected by the Proposed Project?

#### *No- Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. Therefore, under this alternative there would be no impacts to soils.

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, and University Town Center (Action Alternative)*

Under the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center alternatives, the sites would be cleared and graded for construction of new buildings. There would be a direct loss of soil from construction. Indirectly soil erosion could cause sediments to enter storm drains and eventually streams. To mitigate the impacts of soil erosion and sedimentation, an erosion and sediment control plan would be developed, approved by MDE, and followed during construction. The impact from soil erosion and sedimentation would be expected to be minor, indirect, adverse, and short-term.

#### *Parklawn Building (Action Alternative)*

Under the Parklawn Building alternative, the building would be renovated. No clearing or grading activities would occur. Soils would not be impacted under this alternative.

### 3.4.3 What Measures Will be Taken to Ensure That Erosion and Sedimentation Are Controlled?

For the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center sites, the developer/owner would be responsible for developing and implementing an erosion and sediment control plan for approval by MDE and local jurisdictions. The plan would aim to reduce and control sediments entering storm drains and streams. The developer/owner would be required to follow the erosion and sediment control plan during grading and other ground disturbing activities to ensure soil stability is maintained. BMPs would be used to control and minimize sediments; which include but are not limited, to using hay bales and silt fences and revegetation of exposed soils. Information about the erosion and sediment control plan is also found in Section 3.6. No mitigation measures are proposed for the Parklawn Building site.

## 3.5 Floodplains

Federal activities within floodplains must comply with Floodplain Management: EO 11988, 33 C.F.R. 1977. Per EO 11988, federal agencies are required to avoid adverse effects associated with the occupancy and modification of floodplains to the extent possible, thereby minimizing flood risk and risks to human safety (FEMA, 2006). An eight-step decision-making process for floodplain management and wetlands protection has been outlined by 44 CFR 9.6 and in GSA's Floodplain Management Desk Guide. GSA will follow this eight-step process to ensure compliance with EO 11988 when it is determined that a proposed action is located within a wetland and/or the 100-year floodplain.

Per Code of Maryland Regulations (COMAR) 26.17.04 a "Joint Federal/State Application for the Alternation of any Floodplain, Waterway, Tidal or Nontidal Wetland in Maryland" would need to be completed and submitted to the MDE for a letter of authorization for any action located within the 100-year floodplain.

### 3.5.1 Are there Floodplains on the Proposed Sites?

According to FEMA and local Prince George's County floodplain mapping only the University Town Center site is partially located within a floodplain. Floodplain maps for each of the sites are located in Appendix A (Figures A-11 through A-15).

#### *Irvington Centre at King Farm*

The floodplains of the King Farm site are mapped on FEMA Flood Insurance Rate Map (FIRM) panel number 24031C0331D. The King Farm site is located in Zone X, outside the 100-year floodplain.

#### *New Carrollton Metro*

According to the *Prince George's County Lower Beaverdam Creek Watershed Study* (G&O, 1990), the New Carrollton Metro site is located outside the 100-year floodplain<sup>1</sup>.

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<sup>1</sup> Prince George's County participates in the National Flood Insurance Program (NFIP). Under this program local municipalities are encouraged to exceed the minimum NFIP standards. As such Prince George's County has studied several of the streams within the county to re-evaluate the floodplain. A floodplain study was conducted and approved for the New Carrollton Metro site in the early 1990s and for the University Town Center site on October 31, 2001.

### *One Largo Metro*

The floodplains of the One Largo Metro site are mapped on FEMA FIRM panel number 24522080045D. The One Largo Metro site is located in Zone X, outside the 100-year floodplain. No floodplain study has been conducted by Prince George's County for this area.

### *Parklawn Building*

The floodplains of the Parklawn Building site are mapped on FEMA FIRM panels numbered 24031C0361D and 24031C0353D. The Parklawn Building site is located in Zone X, outside the 100-year floodplain.

### *University Town Center*

According to the *Prince George's County Anacostia River Watershed Study* (G&O, 2001), portions of the University Town Center site are located within the 100-year floodplain<sup>1</sup>. The University Town Center site is bordered to the east by a stream, flowing southeasterly to Northwest Branch.

## **3.5.2 How Would the Proposed Project Affect Floodplains?**

EO 11988 provides floodplain management requirements for Federal projects. The objective of this order is to avoid to the maximum extent practicable long- and short-term impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development whenever there is a practicable alternative.

The Maryland Stream and Floodplain Regulations (COMAR 26.17.04) applies to floodplain issues for the proposed action. Construction activities in these areas need a Non-tidal Wetland and Waterway Permit which are reviewed to (1) assure that construction activities within waters of the state will not contribute to flooding on upstream or downstream property and/or cause stream bank erosion; (2) assure that the structure will withstand the passage of floodwaters; and (3) to evaluate the safety, operation and maintenance of a structure. Furthermore, one of the requirements of SFO 08-011 is that the selected property will not be located within a base floodplain unless GSA has determined that there is no practicable alternative.

### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn

Building and the other currently leased locations in Suburban Maryland. Therefore, under this alternative there would be no impacts to the floodplains.

#### *Irvington Centre at King Farm, New Carrollton Metro, and One Largo Metro (Action Alternative)*

Under the King Farm, New Carrollton Metro, and One Largo Metro Alternatives, the sites would be cleared and graded for construction of new buildings. There are no floodplains located on any of these sites. Therefore, there would be no direct impacts to floodplains at these sites.

Development of these alternative sites could indirectly affect floodplains by increasing stormwater runoff. By implementing appropriate stormwater management measures outlined in Section 3.6.3, this alternative would have a minor, long-term, adverse impact on floodplains.

#### *Parklawn Building (Action Alternative)*

The Parklawn Building is not located within a floodplain. If this action is selected, the building would be renovated and minor site alterations may occur. Therefore, there would be no direct or indirect impact to floodplains at this site.

#### *University Town Center (Action Alternative)*

Construction at the University Town Center site could result in direct impacts to the 100-year floodplain if proposed construction should occur within the floodplain. However, because it is assumed that the proposed facility and associated infrastructure would avoid construction in the 100-year floodplain, no direct impacts to floodplains are anticipated under this alternative.

Construction at the University Town Center site could indirectly affect floodplains by increasing stormwater runoff. By implementing appropriate stormwater management measures outlined in Section 3.6.3, runoff to the floodplain would be minimized and this alternative would have a minor, long-term, adverse impact on floodplains.

### **3.5.3 What Measures Would be Taken to Protect Floodplains?**

Because floodplains are located on the University Town Center site, the developer/owner would be required to develop the site outside of the 100-year floodplain. The developer/owner of the University Town Center site would be required to provide a detailed survey of the site plan, prior to GSA making a site selection, clearly indicating that development would occur outside the 100-year floodplain.

Indirectly, floodplains in the vicinity of the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center sites could be impacted by runoff during and after construction. The developer would be required to implement stormwater management practices to manage the quantity of water flowing into area streams. By doing this, there would be no increase in flood levels during storm events.

### 3.6 Stormwater Resources

According to COMAR 26.17.01, *Water Management*, and 26.17.02, *Stormwater Management*, construction activities that disturb more than 5,000 SF (0.11 acre) of land area and/or more than 100 cubic yards of earth require a sedimentation and erosion control plan and a stormwater management plan consistent with the 2000 *Maryland Stormwater Design Manual, Volumes I and II (revised 2009)*, and as supplemented by the *Maryland Stormwater Management Guidelines for State and Federal Projects (revised April 2010)*. Additionally, the State of Maryland enacted the *Stormwater Management Act of 2007*, which requires the use of ESD and low-impact development practices for all new development and redevelopment projects.

#### 3.6.1 How Has Stormwater Management at Each of the Project Sites Been Provided?

##### *Irvington Centre at King Farm*

The King Farm site is currently undeveloped and is part of a larger Irvington Centre/King Farm Development. In the Development Concept Plan submitted to the City of Rockville for approval in October 2005, four quality and quantity stormwater management facilities were proposed and approved to treat on-site runoff. Stormwater management facilities for this larger development have been fully constructed in accordance with state and federal regulations. They have since been conveyed to the City of Rockville, Maryland for maintenance.

##### *New Carrollton Metro*

The New Carrollton Metro site is presently an undeveloped parcel flanked to the north by Ellin Drive and Marc/Metrorail lines to the south. West of the site the topography slopes downwards to an existing stormwater management facility and a tributary to Beaver Dam Creek. Based upon the topography of the site, it is assumed that existing stormwater flows off-site to this facility.

### *One Largo Metro*

The One Largo Metro site is presently an undeveloped parcel surrounded by commercial offices and mixed-use land areas. This site is part of the larger Largo Town Center Development for which, stormwater management facilities have been fully approved and constructed in accordance with state and federal regulations. Stormwater runoff primarily flows towards the existing Largo Lake.

### *Parklawn Building*

The existing office building on the property site was constructed in the 1970's prior to stormwater management regulations. An on-site child care facility was added to the site in the 1990s and stormwater management was provided for construction which included quality control in accordance with the regulations that existed at that time.

### *University Town Center*

Presently the University Town Center site is a fully paved parking area, occupying approximately 9.5 acres of impervious surface. Minimal stormwater treatment and storage facilities are provided on-site. Stormwater currently flows into storm drains near the site. This parcel is part of the larger University Town Center Development.

## **3.6.2 How Would the Proposed Project Affect Stormwater?**

### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to occupy office space at the Parklawn Building and other currently leased buildings in Suburban Maryland. With the No-Action Alternative there would be no additional direct or indirect impacts to stormwater.

### *Irvington Center at King Farm, New Carrollton Metro, One Largo Metro (Action Alternative)*

With the proposed activity at the King Farm, New Carrollton Metro, and One Largo Metro sites impervious surface would be created on currently undeveloped parcels. This would result in additional stormwater flow to existing stormwater management facilities within the project area at each of these sites. However, each of these proposed sites would include the installation of additional stormwater management facilities to minimize these impacts as discussed in Section

3.6.3. In general, it is anticipated that the impact to stormwater would be minor, adverse, long-term, and indirect for each of these sites.

*Parklawn Building (Action Alternative)*

Renovation of the Parklawn Building site would qualify as a redevelopment project and the developer/owner would be required to follow Maryland's Stormwater Act of 2007, which specifies a 50 percent reduction in impervious surface area below existing conditions (MDE, 2010b). If this is impractical then ESD measures would be implemented to the maximum extent practicable to meet the equivalent of a 50 percent reduction in impervious surface to control water quality (MDE, 2010b). With the required stormwater management practices put in place, no additional impervious surface would be planned on-site. There would be no increase in stormwater flow. Therefore, there would be a minor, long-term, beneficial, impact to stormwater.

*University Town Center (Action Alternative)*

Construction of the HHS Lease Consolidation at the University Town Center site would result in the redevelopment of the existing parking area. Some of the areas that are paved would likely be replaced with a building while some portions of the site could be landscaped reducing on-site impervious surface area. If the University Town Center site is selected it would result in minor, beneficial, long-term impacts due to the improved treatment of stormwater on-site and the reduction in impervious surfaces.

### **3.6.3 What Types of Stormwater Control Measures Would be Implemented Under the Proposed Action?**

For each of the alternative sites for the HHS lease Consolidation, the developer/owner would be required to comply with the MDE regulations for ESD (COMAR 26.17.2), which would improve stormwater management. This would include developing plans to treat stormwater quantity and quality as required by Maryland Stormwater Design Manual, Volumes I & II (Effective May 2009) and obtain necessary approvals from MDE. MDE requirements for stormwater management facilities include but are not limited to, the installation of green roofs, bioretention areas, grass channels, and underground sand filter structures.

## 3.7 Coastal Zone Management

The Federal Coastal Zone Management Act of 1972 (CZMA) encourages states to “preserve, protect, develop, and where possible, restore or enhance the resources of the nation’s coastal zone” (16 U.S.C. § 1456). All federal development projects inside the coastal zone must comply with Section 307 of the CZMA, which require federal agencies to determine whether construction and operational activities are would affect any coastal use or resources, and requiring a consistency determination. Actions that have been identified as having a direct effect on the coastal zone must be consistent with the enforceable policies of Maryland’s Coastal Zone Management Program (MDE, 2004).

### 3.7.1 What Makes Up Maryland’s Coastal Zone?

Maryland’s Coastal Zone is comprised of 16 counties and Baltimore City. This boundary encompasses the political boundaries of communities with the water and land areas which border the Atlantic Ocean, Chesapeake Bay, and Potomac River (MDE, 2004). The Maryland Coastal Zone includes Prince George’s County, but not Montgomery County. The One Largo Metro, New Carrollton Metro, and University Town Center sites are located within Prince George’s County and are located in the Maryland Coastal Zone. Therefore, these sites are subject to Federal Consistency Review pursuant to the CZMA and Maryland Coastal Zone Management Program. The HHS Lease Consolidation at any of these three alternative sites would result in a direct federal action under the CZMA. The following section provides GSA’s CZM Plan consistency determination for the proposed sites in Prince George’s County. This EA is being submitted to the MDE Coastal Program for their concurrence with GSA’s consistency determination.

### 3.7.2 Is the Proposed Project Consistent with Maryland’s Coastal Zone Program?

The New Carrollton Metro, One Largo Metro, and University Town Center sites are located in the coastal zone. Therefore, GSA has prepared and analyzed each of these sites for consistency with Maryland’s Coastal Zone Plan.

“Overall management [in the State of Maryland] is achieved through the use of existing state regulatory programs, an EO mandating the Program, and Memoranda of Understanding between appropriate state departments,” (MDE, 2004). Maryland’s Coastal Zone consistency determination is conducted through the Coastal Zone Consistency Division in the Water Management Administration within the MDE (MDNR, 2004).

Table 4 summarizes permitted activities within the Maryland coastal zone that may affect consistency with the Maryland CZM Plan and indicates their applicability to the three alternative sites located for which a consistency determination is required.

The New Carrollton Metro, One Largo Metro, and University Town Center sites are located in Maryland's Coastal Zone and are located within areas currently planned for future development. The developers/owners of these sites would be required to install stormwater management controls to minimize impacts of stormwater flows off-site in accordance with MDE regulations. Construction of the HHS Lease Consolidation at the New Carrollton Metro, One Largo Metro, or University Town Center sites that are located within Maryland's Coastal Zone would not impact sensitive resources within the coastal zone including air quality, wetlands, and water quality. All construction activities on the selected alternative site would comply with applicable federal, state, and county laws and regulations that affect the Coastal Zone, including sediment and erosion control and stormwater management regulations. Therefore, the proposed action would have minor impacts to the Coastal Zone and would be consistent with Maryland's Coastal Zone Management Program.

### **3.7.3 What Measures Will be Taken to Protect the Coastal Zone?**

The developers/owners would be required to develop the site for the HHS Lease Consolidation to meet all applicable State of Maryland and Prince George's County regulations. The developer/owner of the site selected would be required to submit sediment and erosion control and stormwater management plans to the State of Maryland. These plans would incorporate measures into the site development which would minimize impacts to any tributaries to coastal waters.

**Table 4: Permitted Activities Within Maryland's Coastal Zone**

Permit/Approval	Issuing Agency	Applicability to the HHS Lease Consolidation Project
Air Quality Permit	Air Quality Permits Program, Air and Radiation Management Administration, MDE	If necessary, air quality permits would be obtained by the developer for the installation of air handling equipment
Aquaculture Permit	Fisheries Service, DNR	Not applicable
Chesapeake and Atlantic Coastal Bays Critical Area Approval	Critical Area Commission for the Chesapeake and Atlantic Coastal Bays	Alternative sites are not located in the Critical Area
Controlled Hazardous Substances Facility Permit	Hazardous Waste Program, Waste Management Administration, MDE	Facility would not treat, store, or dispose of hazardous waste
Erosion and Sediment Control and Stormwater Management Plan	Nonpoint Source Program, Water Management Administration, MDE	The developer/owner will submit erosion and sediment control plans and stormwater management plans to MDE for the selected alternative site
Nontidal Wetlands and Waterways Permit	Wetland and Waterways Program, Water Management Administration, MDE	Development of any of the alternatives sites would not require the fill of wetlands. If necessary for the discharge of stormwater, the developer of the chosen site would obtain a wetland and waterways permit
Oil and Gas Exploration and Production	Mining Program, Water Management Administration, MDE	Not applicable
Oil Operations Permit	Oil Control Program, Waste Management Administration, MDE	Facility would not store more than 10,000 gallons of oil in above-ground tanks, transport oil, or operate oil transfer facilities
Refuse Disposal Permit	Solid Waste Program, Waste Management Administration, MDE	Facility would not include a refuse disposal system
Tidal Wetlands License or Permit	Wetland and Waterways Program, Water Management Administration, MDE	No tidal wetlands would be affected by the proposed action on any of the alternative sites
Water Appropriation and Use Permit	Water Supply Program, Water Management Administration, MDE	The proposed action would not use surface water or underground waters
Water Quality Certification	Wetland and Waterways Program, Water Management Administration, MDE	Development of any of the alternatives sites would not require the fill of wetlands. If necessary for the discharge of stormwater, the developer of the chosen site would obtain a water quality certification
Water Discharge Permit	Wastewater Permits Program, Water Management Administration, MDE	Wastewater would not be disposed of into the State's groundwater or surface water under any of the alternatives
Wetlands Mitigation Plan	Wetland and Waterways Program, Water Management Administration, MDE	Development of any of the alternatives sites would not require the fill of wetlands.

## 3.8 Vegetation and Wildlife

### 3.8.1 What Type of Vegetation and Wildlife is Located On or Near Each of the Proposed Sites?

#### *Irvington Centre at King Farm*

The King Farm site is a large grass covered open lot. Sparse tree covered on-site are characterized by sweet gum (*Liquidambar styraciflua*) and locust (*Gleditsia triacanthos*). No other vegetation was observed on-site. The King Farm site could provide habitat for birds (e.g. American robin (*Turdus migratoris*)) and small mammals (e.g. grey squirrel (*Sciurus carolinensis*)). During a site visit in June 2010, a burrow was observed. The burrow may provide habitat for native mammals, including groundhog (*Marmota monax*) or red fox (*Vulpes vulpes*). No animals were observed using the burrow at the time of the site visit and it is unclear if the burrow is currently being used. No other animals were observed during the site visit.

#### *New Carrollton Metro*

The New Carrollton Metro site is characterized by different stands of trees. A deciduous stand occupies the majority of the site containing callery pear (*Pyrus calleryana*), sweet gum (*Liquidambar styraciflua*), and locust (*Gleditsia triacanthos*). A smaller stand of Virginia pine (*Pinus virginiana*) of uniform size is located in the center of the property. All trees are estimated to be ten years or younger. The understory consists of grasses and shrubs, consistent with other urban, undeveloped lots of the area. No wildlife was observed during the site visit. The forest stands and the proximity of the site to Beaverdam Creek, make the site suitable for short-term habitat for native wildlife such as white-tailed deer (*Odocoileus virginianus*), grey squirrel (*Sciurus carolinensis*), American robin (*Turdus migratoris*), and mourning dove (*Zenaida macroura*).

#### *One Largo Metro*

The One Largo Metro site visit was conducted in June 2010. The vegetation on-site is characterized by colonizing species, indicative of recent disturbance to the site. Locust (*Gleditsia triacanthos*), tree of heaven (*Ailanthus altissima*), grasses, and shrubs were observed on-site. The trees observed were less than ten feet tall and appeared to be less than five years old. During the site visit, common birds and evidence of native mammals were observed. Bird species observed include the American robin (*Turdus migratoris*), mallard (*Anas platyrhynchos*), and hooded warbler (*Wilsonia citrina*). A mallard nest was also observed, with ten un-hatched eggs.

### *Parklawn Building*

The Parklawn Building site is largely developed, with potted plants and deciduous trees that line walkways in front of the existing building. The plants are a mix of ornamental and native plants. The site may provide habitat for a small population of birds (e.g. American robin) and small mammals (e.g. grey squirrels).

### *University Town Center*

The University Town Center site consists of a paved lot and does not include any vegetation. Adjacent to the lot is a forested stream buffer. It consists of deciduous trees including sycamore (*Plantanus occidentalis*), red maple (*Acer rubrum*), and sweetbay magnolia (*Magnolia virginiana*). No habitat for wildlife exists on-site. Adjacent to the site is a conservation easement, which may provide habitat for wildlife and act as a corridor for animal movement.

## **3.8.2 How Would Vegetation and Wildlife be Affected by the Proposed Project?**

### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the Parklawn Building and buildings in Suburban Maryland. Under this alternative there would be no impacts to the vegetation or wildlife at the proposed sites.

### *Irvington Centre at King Farm (Action Alternative)*

The King Farm site was previously cleared, and construction activities would not disturb any mature forest or important vegetative communities. There would be loss of vegetative areas in place of buildings, but many open areas would be re-vegetated after construction. If this site is developed, wildlife may be temporarily displaced during construction activities, however, wildlife activity would return after the development of the site. Therefore, there would be negligible, short-term, adverse impacts to vegetation and wildlife from this alternative.

### *New Carrollton Metro (Action Alternative)*

The New Carrollton Metro site was previously developed and consists of an immature deciduous stand and immature evergreen stand. If construction were to occur at the New Carrollton Metro site, vegetation would be removed and following construction, the bare land would be landscaped. If this site is developed wildlife may be temporarily displaced but, following construction activities

animals would be able to return. The potential impacts to vegetation and wildlife are minor, adverse, and short-term.

#### *One Largo Metro (Action Alternative)*

The One Largo Metro site was previously cleared. If the HHS Consolidation occurs at this site construction activities would remove grasses, immature trees, and invasive tree species. The area of the site that is not used for the proposed facility would be landscaped with grass and trees, following construction activities. If this site is developed, wildlife would be temporarily displaced; however, following construction activities, animals would be able to return to the landscaped areas of the site. The mallard and hood warbler are protected under the Migratory Bird Treaty Act (MBTA); consequently, it is illegal to “take” individual birds, eggs, feathers or nests. It is likely that construction on-site would not impact migratory birds. However, if any nests are present on-site, they would be removed in accordance with a Migratory Bird Permit obtained by the FWS Region 5 permit office. There would be minor, adverse, and short-term impacts to vegetation and wildlife from this alternative.

#### *Parklawn Building (Action Alternative)*

The Parklawn Building site is a developed area and the renovation activities on-site would not disturb or remove any vegetation. If this site is developed, birds and small mammals may be temporarily displaced, but following construction activities, wildlife would not be impacted. There would be no impacts to vegetation and wildlife from this alternative.

#### *University Town Center (Action Alternative)*

The University Town Center site is currently a parking lot. Vegetation would not be removed during construction activities. The proposed site would include landscape around buildings and parking lots after construction and there is the potential for a decrease in impervious surfaces thus creating additional vegetative areas. In addition, the conservation area adjacent to the University Town Center site would not be affected. Therefore, the impact to vegetation and wildlife from this alternative would be negligible, beneficial, and short-term.

### **3.8.3 What Efforts Would be Made to Protect the Vegetation and Wildlife?**

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, University Town Center*

The developer/owner of the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center proposed sites could minimize impacts to vegetation and wildlife by limiting the area

of ground clearing for structural components (e.g., building, parking lot). Open space with no plans for development should not be used for parking or other construction related clearing unless it is the only feasible option.

Additional mitigation can be accomplished by improving remaining open space after construction activities. Landscaping would be accomplished using native plants to the extent feasible. Non-native plants would be removed and replaced with native plants to fill open spaces cleared during construction activities.

#### *One Largo Metro*

In addition to the mitigation measures outlined above, the developer/owner of the One Largo Metro site would need to obtain a Migratory Bird Permit from FWS Region 5 permitting office prior to disturbance at the site for removal of any nests on site. If any nests are present on site, they would be removed in accordance with the Migratory Bird Permit.

## 3.9 Archeology

### 3.9.1 What Archeological Resources Are Located At Each of the Proposed Sites?

Except for the Parklawn Building alternative, which entails only renovation, construction at the proposed alternative sites would involve earth-disturbing activities, which would impact archeological resources. However, the areas in which the five alternatives are located have all seen significant levels of development, which decreases the likelihood that significant intact archeological resources are present. The status of archeological research for each alternative is presented below.

#### *Irvington Centre at King Farm*

Seven archeological sites have been recorded within 1-mile of the King Farm alternative site; none are located within the archeological APE. Seven archeological surveys and assessments have been conducted within this 1-mile radius (Fiedel et al. 2000; G&O, 1995; Harris 2007; Hill et al. 2007; Kavanagh 1981; LeeDecker and Friedlander 1986; and Thomas 1979). Although the 1995 assessment report by Greenhorne & O'Mara includes the King Farm site, a full archeological investigation was not conducted (G&O, 1995).

#### *New Carrollton Metro*

One archeological site has been recorded within 1-mile of the New Carrollton Metro site; it is not located within the archeological APE. Three archeological surveys have been conducted within this 1-mile radius (Gardner 1976; Gardner and Stewart 1978; and Papson 2007). The single recorded archeological site, 18PR861, is a small deposit of domestic artifacts dating to the nineteenth and twentieth centuries (Papson 2007). Given the limited previous investigations in the area, it is unclear if archeological sites are present in this location.

#### *One Largo Metro*

Nine archeological sites have been recorded within 1-mile of the One Largo Metro site; none are located within the archeological APE. Seven archeological surveys have been conducted within this 1-mile radius (Balicki and Corle 2007; Dixon et al. 1996; Fischler and Ziegler 1997; Gardner and Stewart 1978; Gibb 2004; Handsman and Quinn 1974; Hopkins and Boulton 1996; Rule and Evans 1982). Additionally, a field reconnaissance conducted by Greenhorne & O'Mara in 2006 included this site (G&O, 2008).

#### *Parklawn Building*

No archeological sites have been recorded within 1-mile of the Parklawn Building alternative. Five archeological surveys conducted nearby did not identify any archeological sites within the 1-mile radius (Comer et al. 2006; Curry 1983; Epperson 1980; Gardner 1976; Mid-Atlantic Archaeological Research, Inc. 1979; and Thomas 1979). The Parklawn Building alternative entails renovation of the existing building at 5600 Fishers Lane. Given this fact, no impacts to archeological resources would be anticipated for the Parklawn Building site.

#### *University Town Center*

Five archeological sites have been recorded within 1-mile of the University Town Center alternative, none of which has been evaluated for NRHP eligibility. Six archeological surveys have been conducted within the 1-mile radius (Anderson 1981; Barrett 2004; Baumgardt 1994; Taylor et al. 1980; Tyler et al. 2008; and Williams and Roth 2007). The recorded archeological sites represent prehistoric lithic scatters (18PR81, and 18PR212), the remains of a burned nineteenth-century house (18PR259), temporary World War II housing (Calvert Homes, 18PR260), and a railroad bridge approach for the never constructed Washington, Westminster & Gettysburg Railroad (18PR432).

### 3.9.2 How Would Archeological Resources be Affected by the Proposed Project?

#### *No Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn Building and buildings in Suburban Maryland. Under this alternative there would be no ground-disturbing activity; therefore, there would be no impacts to archeological resources.

#### *Irvington Centre at King Farm (Action Alternative)*

Site inspection of the King Farm site for preparation of this EA shows that the area appears to have been previously graded, most likely during the construction of nearby buildings. If these grading activities extended into the subsoil, it is unlikely that significant archeological deposits would remain, if they had been present originally. Prehistoric archeological sites in this setting are usually confined to the upper 30 to 40 centimeters of soil. If there has been extensive erosion or grading, the sites would be even shallower, often remaining only as surface scatters of artifacts. There is little to no potential to impact archeological resources under this alternative.

#### *New Carrollton Metro (Action Alternative)*

No archeological investigations have been conducted previously on this parcel. There is a moderate potential that intact historic archeological deposits associated with the former twentieth-century structure in this location are present. Prehistoric archeological deposits or pre-nineteenth-century historic sites also could be present. The developer/owner would be required to conduct archeological investigations to determine the presence or absence of archeological resources. If no resources are found there would be no impact to archeological resources. If resources are found, the developer/owner would be required to conduct detailed archeological studies such as Phase II or III evaluations in consultation with the Maryland SHPO and M-NCPPC. These studies would determine the significance of archeological sites and recover important data and information from the archeological site prior to development of the property. With these studies the impact to archeological resources would be moderate, long-term, and adverse.

#### *One Largo Metro (Action Alternative)*

The One Largo Metro site was subject to previous archeological investigations (G&O, 2008). In a letter report M-NCPPC, it was concluded that the project area had been graded previously and was unlikely to retain intact archeological sites or deposits (G&O, 2008). M-NCPPC concurred with the

findings (M-NCPPC, 2008). There is little to no potential to impact archeological resources under this alternative.

#### *Parklawn Building (Action Alternative)*

The Parklawn Building alternative entails renovation of the existing Parklawn Building; no new construction is proposed. Given this fact, no ground disturbing activities are anticipated; therefore there is no potential to impact archeological resources under this alternative.

#### *University Town Center (Action Alternative)*

Currently the parcel is a parking lot paved with asphalt. Given the degree of prior development, it is unlikely that archeological resources are present for the University Town Center site. However, there is a minor potential that intact archeological resources are present under the asphalt if there was little or no previous ground disturbance. The developer/owner would be required to conduct archeological investigations to determine the presence or absence of archeological resources. If no resources are found there would be no impact to archeological resources. If resources are found, the developer/owner would be required to conduct detailed archeological studies such as Phase II or III evaluations in consultation with the MHT and M-NCPPC. These studies would determine the significance of archeological sites and recover important data and information from the archeological site prior to development of the property. With these studies the impact to archeological resources would be minor, long-term, and adverse.

### **3.9.3 What Measures Would Be Taken To Protect Archeological Resources?**

Should either the New Carrollton Metro or University Town Center site be selected for the HHS Lease Consolidation, the developer/owner would be required to submit the project details to the MHT and to M-NCPPC to determine if an archeological survey would be necessary. If an archeological survey were required by the MHT or M-NCPPC, the developer/owner would be responsible for having a qualified professional archeologist undertake the work. If archeological resources were identified, the developer/owner would also be required to have a Phase II evaluation study conducted if requested by the MHT or M-NCPPC to determine if the archeological resources were significant. If the archeological deposits were determined to be significant, the developer/owner would be responsible for implementing the measures recommended by the MHT or M-NCPPC to reach a finding of no adverse effect. GSA would facilitate the coordination with MHT and M-NCPPC in accordance with the NHPA.

## 3.10 Visual Quality

### 3.10.1 What Are the Existing Visual Elements (Aesthetics) That Exist Near Each of the Proposed Sites?

#### *Irvington Centre at King Farm*

The King Farm site is located on a 430-acre mixed-use development that includes residential, commercial, and office buildings. The site is situated on the west side of Piccard Drive, across both sides of its intersection with King Farm Boulevard. New multi-story corporate office buildings, Sheraton Hotel, and parking structures are adjacent to the King Farm site from the northeast to southeast. Redland Boulevard is located to the south, Shady Grove Road runs diagonally from the southwest to northeast, and Interstate-270 (I-270) is located to the west of the parcel. Other nearby commercial, retail, and office buildings are associated with Shady Grove Center to the north and 270 Center to the northwest.

#### *New Carrollton Metro*

The New Carrollton Metro site is located on a vacant parcel between Ellin Road and the Metrorail/MARC/Amtrak railroad tracks. A PEPCO substation is adjacent to the property to the northeast; the New Carrollton Metrorail Station, parking lots, and tracks are to the east and southeast; the IRS New Carrollton Financial Services Center is to the northeast across Ellin Road; and a residential neighborhood is to the northwest. Mature trees and a large berm located directly across Ellin Road to the west and northwest screen the residential area from this parcel.

#### *One Largo Metro*

The One Largo Metro site is located on a vacant parcel north of Harry S. Truman Drive North and west of Lottsford Road. The Largo Metrorail Station and parking facility are immediately to the west; the U.S. Building Interiors building, townhouses, and apartments are to the south and east across Harry S. Truman Drive North and Lottsford Road; and a vacant area lies to the north across Grand Boulevard. Large shopping centers are located to the northwest beyond the Largo Metrorail Station and to the south/southeast across Largo Avenue.

### *Parklawn Building*

The Parklawn Building site is located at 5600 Fishers Lane in Rockville. This location is extensively developed with multi-story commercial, retail, office buildings and parking structures. New construction is underway to the north across Fishers Lane. The Parklawn Cemetery is located to the northeast and wooded areas associated with Rock Creek Regional Park and Rock Creek extend from the north/northeast to the southeast.

### *University Town Center*

The University Town Center site is located within an existing multi-use development. The site is bounded by Toledo Road to the south and Belcrest and Adelphi Roads to the west and east, which then converge to the north. Multi-story commercial, retail, and office facilities surround the parcel. Prince George's Plaza lies to the southwest, apartment buildings to the northwest across Belcrest Road, new retail facilities to the south and southeast at the intersection of Route 410 and Belcrest Road, and a conservation area to the east and northeast of the parcel.

### **3.10.2 How are Viewsheds Going to be Impacted by the Proposed Action?**

The impacts of the five alternative sites on the existing visual environment are assessed below. Factors that were considered include the nature and scale of existing development, the nature and scale of the proposed construction, and the existing quality of the visual environment.

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn Building and buildings in Suburban Maryland. Since there would be no changes to the Parklawn Building or the other three HHS leased buildings, no impact on the visual environment would occur.

#### *Irvington Centre at King Farm (Action Alternative)*

The lease consolidation of HHS on the King Farm site would add additional multi-story building(s) to the visual environment, which would be noticeable from the north and northwest of the parcel. The new construction would replace grassy areas with a new building, thus changing the existing aesthetics. However, the scale, design, and use of the proposed facility would be consistent with the surrounding development. Nighttime views would be impacted from light spillover from security

lighting. Overall, there would be a negligible, long-term, adverse, impact to the visual quality of the area under this alternative.

#### *New Carrollton Metro (Action Alternative)*

The existing train stations, railroad tracks, parking facilities, and electrical substation do not provide an aesthetically significant view. Development in the area includes multi-story buildings, the IRS New Carrollton Financial Services Center, and the Metroplex Building. However, based upon the narrow length of the site and the need for the 935,401 SF of office space, it would be reasonably assumed that the scale of any building on-site would be several stories taller than any surrounding development. Construction for the HHS Lease Consolidation at this site would add a tall, multi-story building to the visual environment that is visible from all sides, including, the residential neighborhoods. While some of the views looking towards the proposed HHS Lease Consolidation would be partially screened by the mature trees to the north, west, and southwest, construction at this location would replace a grass- and tree-covered area with a new building, resulting in a change to the existing aesthetics. Nighttime views from nearby residential areas would also be impacted from light spillover from security lighting. With mitigation, the visual impact of the proposed action would be minor, long-term, direct, and adverse.

#### *One Largo Metro (Action Alternative)*

Consolidation of HHS Lease Consolidation on the One Largo Metro site would add another multi-story building to the visual environment. This would be most visible from the apartments located east of the proposed facility. Construction for this location would replace grassy areas with a new building, resulting in a change to the existing aesthetics. However, the scale, massing, and use of the proposed facility are consistent with development in the surrounding area. Nighttime views from nearby residential areas would also be impacted from light spillover from security lighting. Overall, there would be a negligible, long-term, adverse, impact to the visual quality of the area under this alternative.

#### *Parklawn Building (Action Alternative)*

Since there would be no changes to the building footprint of the Parklawn Building, renovation of the Parklawn Building would have no impact on the visual environment. The scale, design, and use of the facility would be consistent with the surrounding development. Nighttime views from nearby residential areas would be impacted from light spillover from security lighting. Overall, there would be a negligible, long-term, adverse, impact to the visual quality of the area under this alternative.

### *University Town Center (Action Alternative)*

The HHS Lease Consolidation at the University Town Center site would add another multi-story building(s) to the visual environment. This would be most visible from the apartment buildings located to the west and northwest across Belcrest Road. An older, established residential neighborhood in University Park to the east is located across Adelphi Road and is screened by the mature trees of the conservation area and existing buildings. Nighttime views from nearby residential areas would also be impacted from light spillover from security lighting. Construction in this location would replace an asphalt parking lot with a new building, resulting in a change to the existing aesthetics. However, the scale, massing, and use of the proposed facility are consistent with development in the surrounding area. Overall, there would be a negligible, long-term, adverse, impact to the visual quality of the area under this alternative.

#### **3.10.3 What Measures Would be Taken To Reduce Impacts to Viewsheds?**

The developer/owner would be required to reduce the impacts of light spillover onto adjacent properties or into residential areas. The following mitigation measures would be implemented by the developer/owner for any of the Action Alternatives:

- Light fixtures would be shielded with little or no spillover beyond the property lines of the respective site;
- Parking garage and site lighting would be shielded to eliminate/reduce spillover; and
- Landscaping of any of the sites with native vegetation and trees to provide a view of a landscaped area.

## **3.11 Air Quality**

### **3.11.1 Are There Any Air Quality Issues in the Washington Metropolitan Region?**

Under the authority of the Clean Air Act (CAA) (U.S.C. Title 42, Chapter 85, 1970, as amended in 1990), the US EPA has developed National Ambient Air Quality Standards (NAAQS) for certain air pollutants (criteria pollutants) deemed harmful to public health and the environment. These criteria pollutants include: nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), ozone (O<sub>3</sub>), particulate matter (PM<sub>2.5</sub>/PM<sub>10</sub>), and lead (Pb). The EPA designates areas where ambient concentrations are below the NAAQS as being in “attainment” and designates areas where a criteria pollutant level exceeds the NAAQS as being in “nonattainment.”

Each state (or regional government) is required by EPA to develop a State Implementation Plan (SIP) that identifies the NAAQS attainment status for each pollutant and accounts for planned projects within the region that have potential to increase pollutant emissions.

The Washington Metropolitan Region is designated as a non-attainment area for PM<sub>2.5</sub>, and for ground-level ozone under the 8-hour standard (MWCOG, 2008). The 8-hour standard is defined as the 3-year average of the fourth highest daily maximum 8-hour average ozone concentration. The Metropolitan Washington Council of Governments (MWCOG) prepared SIPs to reduce O<sub>3</sub> and PM<sub>2.5</sub> in the region. The SIP to meet O<sub>3</sub> attainment standards was adopted in May 2007 and the SIP to meet PM<sub>2.5</sub> standards was adopted in March 2008.

The CAA identified 188 air toxics also known as hazardous air pollutants. The EPA has assessed this expansive list of toxics and identified a group of 21 as mobile source air toxics (MSATs), which are set forth in an EPA final rule, Control of Emissions of Hazardous Air Pollutants from Mobile Sources (66 FR 17235). The EPA also extracted a subset of this list of 21 that it now labels as the six priority MSATs. These are benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1, 3-butadiene. These MSATs are considered the priority transportation toxics.

### **3.11.2 Will The Proposed Project Impact Air Quality in the Area?**

Federal actions including the lease construction of new office facilities such as the HHS Lease Consolidation must be in conformity with the provisions of the CAA. General conformity requirements are applied to certain Federal actions within air quality nonattainment and maintenance areas.

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn Building and the three other buildings in Suburban Maryland. There would be no construction activities, changes in emissions from building equipment, or changes in traffic patterns. Therefore, the No-Action Alternative would be in conformance with the CAA and there would be no impacts to the air quality at the alternative sites.

*Irvington Centre at King Farm, New Carrollton Metro, and One Largo Metro (Action Alternative)*

Air quality may be temporarily impacted by construction activities at the King Farm, New Carrollton Metro and One Largo Metro sites. Fugitive dust would be generated during construction resulting from site grading, wind erosion, and vehicular activities. Emissions from construction equipment, including earth moving equipment and paving equipment would generate particulate matter, VOCs, and NO<sub>x</sub> which are the precursors to ozone. Construction activities for each of these alternative site locations would extend over a multi-year period. The adverse impact would be minor to moderate, and would occur during the construction period of the selected site.

Under the King Farm, New Carrollton Metro, and One Largo Metro Action Alternatives, the addition of facilities and employees to the proposed sites and subsequent increase in traffic would potentially result in a minor, long-term, direct, adverse increase in emission levels surrounding the project site.

EPA has developed a “Hot Spot Analysis” for determining if a project will have adverse impacts on levels of PM<sub>2.5</sub>. This analysis is not required for the HHS Lease Consolidation because the project does not meet EPA’s criteria (40 CFR 93.123(b)(1) as amended), and, in accordance with FHWA guidance, “40 CFR 93.123(b)(1)(i) should be interpreted as applying only to projects that would involve a significant increase in the number of diesel transit busses and diesel trucks on the facility.” The HHS Lease Consolidation project would not result in an appreciable increase in diesel vehicles over the No-Action Alternative.

Under these alternatives, heating and cooling equipment for the building(s) would be modern, efficient units and it is not anticipated that they would generate emissions above de minimis thresholds. Projects with emission levels below de minimis thresholds are considered to be in conformity with the CAA. If the proposed development would produce more emissions or VOCs or NO<sub>x</sub> than 25 tons per year, the developer/owner would be required to undergo a New Source Review through MDE. In this case, the developer/owner would be required to offset emissions at a ratio of 1.15 to 1.00. By following these requirements, the project would be in compliance with the MWCOG SIP and therefore in compliance with the CAA.

*Parklawn Building (Action Alternative)*

Under this alternative, renovation of the Parklawn Building site would generate fugitive dust from interior demolition and construction activities. Fugitive dust would be contained within the existing

building and measures would be taken to protect construction workers and HHS employees from exposure to particulate matter. Therefore, there would be a minor, short-term, adverse impact to air quality from the renovation of the Parklawn Building site.

This alternative would not generate additional traffic as the additional employees that are to be collocated at the Parklawn Building site would backfill space vacated by other federal tenants nor would it result in additional emissions from building equipment. Therefore, this alternative would be in conformity with the CAA.

EPA has developed a “Hot Spot Analysis” for determining if a project will have adverse impacts on levels of PM<sub>2.5</sub>. This analysis is not required for the HHS Lease Consolidation because the project does not meet EPA’s criteria (40 CFR 93.123(b)(1) as amended), and, in accordance with FHWA guidance, “40 CFR 93.123(b)(1)(i) should be interpreted as applying only to projects that would involve a significant increase in the number of diesel transit busses and diesel trucks on the facility.” The HHS Lease Consolidation project would not result in an appreciable increase in diesel vehicles over the No-Action Alternative.

With the renovation of the Parklawn Building under this Action Alternative, heating and cooling equipment would be modern, efficient units and it is not anticipated that they would generate emissions above de minimis thresholds. Projects with emission levels below de minimis thresholds are considered to be in conformity with the CAA. If the proposed development would produce more emissions or VOCs or NO<sub>x</sub> than 25 tons per year, the developer/owner would be required to undergo a New Source Review through MDE. In this case, the developer/owner would be required to offset emissions at a ratio of 1.15 to 1.00. By following these requirements, the project would be in compliance with the MWCOG SIP and therefore in compliance with the CAA.

#### *University Town Center (Action Alternative)*

Air quality may be temporarily impacted by demolition and construction activities at the University Town Center site. Fugitive dust would be generated during demolition and construction resulting from site grading, wind erosion, and vehicular activities. Emissions from construction equipment, including earth moving equipment and paving equipment would generate particulate matter, VOCs, and NO<sub>x</sub> which are the precursors to ozone. Construction activities for each of the alternative site locations would extend over a multi-year period. The adverse impact would be minor to moderate, and would occur during the construction period of the selected site.

Under this alternative, the addition of facilities and employees to the proposed sites and subsequent increase in traffic would potentially result in a minor, long-term, direct, adverse increase in emission levels surrounding the project site.

EPA has developed a “Hot Spot Analysis” for determining if a project will have adverse impacts on levels of PM<sub>2.5</sub>. This analysis is not required for the HHS Lease Consolidation because the project does not meet EPA’s criteria (40 CFR 93.123(b)(1) as amended), and, in accordance with FHWA guidance, “40 CFR 93.123(b)(1)(i) should be interpreted as applying only to projects that would involve a significant increase in the number of diesel transit busses and diesel trucks on the facility.” The HHS Lease Consolidation project would not result in an appreciable increase in diesel vehicles over the No-Action Alternative.

Under this alternative, heating and cooling equipment for the building(s) would be modern, efficient units and it is anticipated that they would not generate emissions above de minimis thresholds. Projects with emission levels below de minimis thresholds are considered to be in conformity with the CAA. If the proposed development would produce more emissions or VOCs or NOx than 25 tons per year, the developer/owner would be required to undergo a New Source Review through MDE. In this case, the developer/owner would be required to offset emissions at a ratio of 1.15 to 1.00. By following these requirements, the project would be in compliance with the MWCOG SIP and therefore in compliance with the CAA.

### **3.11.3 What Would be Done to Protect Air Quality During Construction?**

Air quality impacts at any of the Action Alternative sites could be considered significant during construction, even on a temporary basis, if MDE regulations (COMAR26.11.02) and BMP control measures are not implemented. These short-term impacts can be minimized by adhering to accepted MDE construction site air quality control measures in the handling of materials and as part of any potential demolition or grading activities. The developer/owner would be required to implement fugitive dust controls such as water spraying of access roads and stockpiles, the employment of dust covers on vehicles transporting dust-emitting materials, keeping disturbed areas to a minimum by developing the site in stages have been shown to be effective in controlling emissions. The developer/owner would also be required to implement a dust abatement/emissions control plan for any construction activities. The plan would include control measures to reduce emissions from construction equipment and control fugitive dust. With these mitigation measures

in place, construction activities would be expected to have minor, direct, short-term, adverse impacts on air quality.

#### **3.11.4 What Permanent Measures Would be Taken to Reduce Long-Term Impacts to Air Quality?**

Under each of the action alternatives, minimal changes in mobile source emissions would be anticipated. The HHS Lease Consolidation would provide convenient access to public transportation with each of the Action Alternatives. HHS employees would be encouraged to use public transportation to commute to and from work. Each of the proposed alternatives provides employees with the benefits and amenities of being situated in a mixed-use development, with services and housing options located in close proximity to the proposed sites. Trip generation would be minimized. Additionally, the project would attract light-duty gasoline vehicles, not heavy-duty diesel vehicles, which generally result in greater PM<sub>2.5</sub> impacts.

For each of the Action Alternatives a LEED®-Silver rated building is proposed, which is consistent with the voluntary measures package presented in the *Plan to Improve Air Quality in the Washington, DC-MD-VA Region, State Implementation Plan*. Through the use of green building materials such as low-emitting materials in adhesives and sealants, paints and coatings, flooring systems, composite wood, and agrifiber products, indoor air quality would be maximized. Through the integration of design elements such as the use of modern heating and cooling equipment, on-site renewable energy sources, and the maximization of daylight, the demand for electricity would be reduced. This decreased demand would displace the power generation required from coal, oil, and/or gas fired sources, resulting in reduced emissions in the region (MWCOG, 2008).

### **3.12 Land Use Planning and Zoning**

#### **3.12.1 What is the Land Use On and Surrounding Each of the Proposed Sites?**

##### *Irvington Centre at King Farm*

The King Farm site is currently undeveloped, however it is located in the larger King Farm Development which was approved in a concept plan by the City of Rockville in 1996. The King Farm Development Plan consists of a vital mixed-use community in close proximity to existing transportation and transit networks. All land surrounding the King Farm site has been developed or is in the process of being developed. Directly west of the site stands a recently built Sheraton Hotel

and a parking garage. Further west of these structures is I-270. East of the site, across Piccard Drive, stands additional office space. The King Farm Development, also located within the municipal boundaries of the City of Rockville, is included in the *Comprehensive Master Plan* for the City of Rockville where Comprehensive Planned Development encourages the integration of low intensity industrial, commercial and residential development areas.

#### *New Carrollton Metro*

The New Carrollton Metro site is an undeveloped parcel located in Prince George's County, Maryland. Directly adjacent to the western boundary of the property is a stormwater management facility and tributary to Beaver Dam Creek. Serving as the southeast boarder of the property is the New Carrollton Metrorail and New Carrollton Marc stations. Single-family residential homes are located across Ellin Road, north and southwest of the subject parcel, separated by foliage screening..

#### *One Largo Metro*

This parcel is surrounded by commercial offices and mixed-use land areas. The northern boundary of the parcel is marked by Grand Boulevard which provides access to the Largo Metro Station parking garage and separates the subject parcel from an undeveloped parcel. To the east the parcel is delineated by Lottsford Road with the Towns at Lake Largo; a townhome community, situated north of Grand Boulevard; and the Vistas, senior housing apartments, situated south to Harry S. Truman Drive. Immediately south of the subject parcel, across Harry S. Truman Drive, is a one-story warehouse and a four-story Metropolitan at Lake Largo Apartments situated to the southeast. Immediately west of the site is the Largo Center Metrorail Station and associated parking areas.

#### *Parklawn Building*

Built in 1970, the Parklawn Building is situated in the Twinbrook neighborhood of Rockville, Maryland. The present office space houses numerous offices of HHS. The office itself is surrounded by a secure parking area. Adjacent to the site, is the Parklawn Cemetery. The surrounding buildings are of similar style and design.

#### *University Town Center*

The University Town Center site is currently a fully paved parking area, located in Prince George's County, Maryland. Directly south of the site and across Toledo Road stands a large office complex. At the southwest corner of Toledo Road and Belcrest Road, Prince George's Plaza provides retail

services to the surrounding offices and residential areas. Apartment complexes are set back from the roadway in the northwest quadrant of the Toledo and Belcrest Road intersection.

### 3.12.2 What Are the Local and Federal Planning and Zoning Ordinances?

#### *Irvington Centre at King Farm*

The King Farm site is located within the municipal boundaries of the City of Rockville, and included in the City's *Comprehensive Master Plan*. The *Comprehensive Master Plan* encourages the integration of low intensity industrial, commercial and residential development areas. The King Farm site is currently zoned Principally Mixed-Use Residential and Commercial Development (PD) under the City of Rockville. The office suites east of the site and across Piccard Drive are zoned PD. Additional land areas in the surrounding vicinity of the proposed site are zoned PD and Mixed-Use Employment (MXE). Based on the Zoning Ordinance of the City of Rockville, MXE areas are recommended for development of office and light industrial uses. A zoning map for this site is located in Appendix A, Figure A-16.

#### *New Carrollton Metro*

Development at the New Carrollton Metro site is guided by the *Prince George's County Approved General Plan* which promotes development as described above. The site is further guided by the New Carrollton Transportation District Development Plan. This plan was adopted by the County Council of Prince George's County, in May 2010 and promotes growth of the area within a half mile radius of the New Carrollton Metrorail Station. The plan (as amended) states that the area is to be developed to feature a mix of high-intensity commercial office, retail, and residential spaces up to 16 stories in height except if HHS is to be the tenant (M-NCPPC, 2009b). In this case, "the height shall be adjusted to address federal tenant requirements, (M-NCPPC, 2009b)." Zoning for this area (PGAtlas, 2010) indicates that the New Carrollton Metro site is zoned for commercial office space (C-O) in a Transit District Overlay (T-D-O) area. T-D-O areas are often designated in the vicinity of Metrorail stations to promote development which would maximize transit ridership while serving the economic and social goals of the area. Serving as the southeast border of the property is the New Carrollton Metrorail station, zoning adjacent to the Metrorail and immediately north of the parcel is for Mixed Use – Transportation Oriented (M-X-T) development. M-X-T promotes the development of office, retail, and dwelling spaces in areas with a transportation network to support the anticipated traffic volumes. Across Ellin Road, north and southwest of the subject parcel,

however, not adjoining it is zoned Single-Family, Small-lot Residential Subdivisions (R-55). -A zoning map for this site is located in Appendix A, Figure A-17.

#### *One Largo Metro*

This parcel is an undeveloped parcel situated in the larger mixed-use development of One Largo Metro which received approval for development from the Prince George's County Planning Board in June 2009. This site is located within the planning area guided by the *Prince George's County Approved General Plan* which promotes economic development to provide jobs and increase the tax base for future residents, along with green building and increasing the role of transit in the county's transportation system. Infill development areas are encouraged while developments of rural areas are avoided to conserve land resources throughout the county (M-NCPPC, 2002b). The One Largo Metro site is zoned Major Activity Center (M-A-C) in Prince George's County, Maryland, which is a mixture of uses designed to serve the regional residential market or provide concentrated employment (MNCPPC, 2002). Directly north of Grand Boulevard and the site is a separate parcel similarly zoned M-A-C. Surrounding residential areas to the east of the site are zoned M-A-C. Immediately south of the subject parcel, across Harry S. Truman Drive, is a one-story warehouse and the four-story Metropolitan at Lake Largo apartments are situated to the southeast. This area is zoned Mixed-Use Infill (M-U-I) where the efficient use of land, facilities, and services are encouraged to be consistent with Smart Growth Principles (MNCPPC, 2002). Immediately west of the site is the Largo Center Metrorail and associated parking areas. This area is zoned Commercial Office (C-O). A zoning map for this site is located in Appendix A, Figure A-18.

#### *Parklawn Building*

The *Twinbrook Neighborhood Plan*, adopted by the City of Rockville in April 2009, directs any future development towards areas currently utilized for commercial and industrial purposes. The Parklawn Building is currently zoned for Transit Mixed-Use (TMX-2). This same zoning designation mandates much of the development in the surrounding area as part of the *Twinbrook Sector Plan*, which gained approval from the Maryland-National Capital Park and Planning Commission on January 21, 2009. The *Twinbrook Sector Plan* calls for redevelopment that focuses on the community's proximity to the Twinbrook Metrorail station and integrates a community of jobs, homes, and retail with green and sustainable features (M-NCPPC, 2009). A zoning map for this site is located in Appendix A, Figure A-19.

### *University Town Center*

Development throughout the county is guided by the *Prince George's County Approved General Plan* which promotes development as described above. The site is further guided by the *Prince George's Plaza Transit District Development Plan* (June, 1998). Zoning mapping for this area indicates that this parcel is zoned for M-X-T development in the TDO area (M-NCPPC, 1998). Directly south of the site, across Toledo Road zoning remains the same (PGAtlas, 2010). West of the site, across Belcrest Road, residential type zoning is designated Multi-Family Medium Density (R-18) and Multi-Family High Density (R-10), while north and east of the site is zoned R-55. A zoning map for this site is located in Appendix A, Figure A-20.

### **3.12.3 Is the Proposed Project Consistent With Federal and Local Planning and Zoning Ordinances?**

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the Parklawn Building and buildings in Suburban Maryland. There would be no change in land use or zoning.

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building and University Town Center (Action Alternatives)*

Under all of the Action Alternatives, office space would be provided for approximately 2,900 HHS employees. The King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building and University Town Center sites are each located in areas presently planned and zoned by their applicable County and Municipal governments for further development. This proposed HHS Lease Consolidation would integrate the use of green and sustainable technologies in the design of the building facility while promoting the use of existing transit networks and community facilities by employees. These qualities and missions are reflected in the zoning mandated by Montgomery and Prince George's Counties as well as the City of Rockville for each of the Action Alternative sites. Therefore, the proposed activity is consistent with the existing and planned development at each of Action Alternative sites for the HHS Lease Consolidation.

### 3.12.4 What Efforts Would be Taken to be Consistent with Federal and Local Planning and Zoning Ordinances?

The proposed development at the King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building and University Town Center sites would be consistent with area zoning and planning ordinances for each of the Action Alternative sites, no additional efforts would be required to ensure that the proposed activity is consistent with Federal and local ordinances.

## 3.13 Economy and Employment

### 3.13.1 What is the Economic Make-up of the Community Surrounding Each of the Proposed Sites?

Table 5 provides a summary of employment by occupation in the State of Maryland, Montgomery and Prince George's Counties based on 2000 Census data. Construction related employment, which could be affected by the proposed lease consolidation, is 8.6 of the population within the State of Maryland, 5.2 percent in Montgomery County, and 8.2 within Prince George's County. In addition, the table includes the 2006-2008 American Community Survey (ACS) 3-Year Estimates of employment for Montgomery and Prince George's Counties.

**Table 5: Employment by Occupation (U.S. Census Bureau, 2010)**

Occupation	State of Maryland	Montgomery County		Prince George's County	
	2000 Census (%)	2000 Census (%)	2006-2008 ACS (%)	2000 Census (%)	2006-2008 ACS (%)
Management, professional, and related occupations	41.3	56.6	55.5	38.9	39.1
Service Occupations	13.9	11.5	14.4	14.8	17.3
Sales and office occupations	26.4	22.0	19.9	29.0	25.5
Farming, fishing, and forestry occupations	0.3	0.1	0.1	0.1	0.1
Construction, Extraction, maintenance, and repair occupations	8.6	5.2	6.0	8.2	9.8
Production, transportation, and material moving occupations	9.5	4.6	4.2	9.0	8.1

According to the 2000 Census, the median household income in Montgomery County was \$71,551, \$55,256 in Prince George’s County, and \$52,868 in Maryland. Unemployment rates from Montgomery and Prince George’s counties were also reviewed in comparison with those of the State of Maryland. Due to the recent economic downturn, these rates were reviewed for a timeframe from 2007 to the present. The results are shown in Table 6 Unemployment Rates: 2007 Through June 2010.

**Table 6: Unemployment Rates: 2007 Through June 2010**

Timeframe	Maryland	Montgomery County	Prince George’s County
Jan – May 2010	7.6	5.6	7.4
2009	7.0	5.3	6.9
2008	4.4	3.3	4.5
2007	3.5	2.7	3.7

(MDLLR, 2010)

### 3.13.2 What Impact Would the Proposed Project Have on the Local and Regional Economy?

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn Building and other buildings in Suburban Maryland. There would be no change in the economy from the No-Action Alternative.

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, University Town Center (Action Alternatives)*

For the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center Action Alternatives, new retail services and business employment would likely result from the HHS Lease Consolidation as new businesses in the area are created to serve additional HHS employees. Existing businesses would experience beneficial impacts from HHS employees frequenting these establishments. Beneficial economic effects may occur from contractual obligations with vendors to support the proposed action. The categories of services include maintenance and repair contractors such as HVAC, plumbing, and electrical; printing and publishing; equipment rental; and business service providers. This impact would be localized, minor, long-term, and beneficial. In addition,

there would be an economic benefit from payroll spending by HHS employees to local businesses. These impacts would be minor, long-term, and beneficial.

If King Farm, New Carrollton Metro, One Largo Metro, or University Town Center site is selected, the Parklawn Building and the space occupied by HHS in the other three buildings in Suburban Maryland would be left vacant until such time they are leased. Given the rate of office vacancies in Montgomery County, which has risen from 15.7 percent during the first quarter of 2010 to 16.3 percent, the Parklawn Building and the three other buildings may remain vacant for a period of time should another site be selected for the HHS Lease Consolidation (Cushman & Wakefield, 2010).

However, given the location of the Parklawn Building and the other three buildings in a major commercial area with access to Metrorail, it is anticipated that the Parklawn Building and the space vacated by HHS in the other three buildings would be leased and/or redeveloped in the future.

Therefore, a moderate, short-term, adverse impact to the local economy would occur until such time as new tenants occupy the buildings.

Economic activity would directly increase in the short-term as construction contractors and construction firms are hired for the project. The purchase of building materials, construction supplies, and construction equipment would add income to the economy. These activities would have a short-term, direct, beneficial effect on local economic conditions.

#### *Parklawn Building (Action Alternative)*

Under this alternative, approximately 200 additional HHS employees would be collocated to the Parklawn Building. They would backfill existing space left vacant by other federal employees. While the collocation of these employees to the Parklawn Building may result in some increase of patronage to area businesses that has not occurred since previous Federal employees vacated the Parklawn Building, the impact would be negligible, short-term, and beneficial.

### **3.13.3 Would the Proposed Project Affect Employment Within the Area?**

#### *No-Action Alternative*

Under the No-Action Alternative, HHS would not develop or renovate any of the proposed sites.

HHS would continue to operate at the existing Parklawn Building and buildings in Suburban Maryland. Therefore, existing employees would not be concentrated at one main office. There would be no change in employment within the area.

*Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, University Town Center (Action Alternative)*

The proposed action involves the collocation of existing components of HHS. It is not anticipated at this time that the collocation would result in additional hires by HHS; therefore, there would be no direct long-term impact to area employment. However, the aforementioned beneficial impacts to area businesses would potentially result in increased hires by these businesses to serve the needs of HHS employees. These impacts would be minor, long-term and beneficial. In the short-term, with the selection of the King Farm, New Carrollton Metro, One Largo Metro or University Town Center sites there would be an increase in area employment during the construction period.

*Parklawn Building (Action Alternative)*

The proposed action involves the collocation of existing components of HHS to the Parklawn Building. There would be no direct long-term impact to area employment as it is not anticipated at this time that the collocation would result in additional hires by HHS. With the selection of the Parklawn Building site there would be a short-term increase in area employment during renovation of the Parklawn Building.

#### **3.13.4 How Would the Proposed Project Impact Taxes and Revenue?**

The State of Maryland levies an 8.5 percent corporate tax on businesses; a 4.75 percent personal income tax on incomes from 3,001 to \$150,000 for single taxpayers and on incomes from \$3,001 to \$200,000 for joint tax payers; and a tax of \$0.112 per assessed \$4,100 on real estate (DBED, 2010). A six percent sales and use tax is imposed upon the sale or use of tangible personal property and certain services (Comptroller of Maryland, 2010). County and City governments have the authority to impose an additional personal income tax beyond the State tax. The Montgomery and Prince George's Counties personal income tax rate is 3.2 percent (DBED, 2010).

*No-Action Alternative*

Under the No-Action Alternative, HHS would not develop or renovate any of the proposed sites. HHS would continue to operate at the existing Parklawn Building and buildings in Suburban Maryland. Therefore, existing employees would not be concentrated at one main office. There would be no change to taxes or revenues within the area.

*Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, University Town Center (Action Alternative)*

The proposed action is the acquisition of space through leasing. GSA would lease space from a private developer/owner and the proposed site would remain under private ownership. The ownership of the King Farm, New Carrollton Metro, One Largo Metro and the University Town Center sites would remain owned and maintained by a private developer/owner under the proposed action. Therefore, the local and state governments would see a minor, long-term, direct, and beneficial impact to tax revenue from the proposed action because the developer/owner would be required to pay local and State property taxes.

Additionally, there would be an increase in spending by HHS employees at local businesses if any of these sites are selected for the purchases of materials and goods because office space at these sites does not currently exist. Therefore, bringing an additional 2,900 people to any of the sites would increase activity at local businesses, which in turn would generate additional sales taxes and revenues for local and state governments. Secondary jobs related to the increased economic activity stimulated by the proposed action may also result in additional retail services and business employment opportunities through a multiplier effect, yielding additional sales and income tax revenues for local and state governments. This impact would have a minor, long-term, indirect, and beneficial impact on sales and income taxes and revenues.

In the short-term, construction workers would be employed during the construction period. The workers would be residing and paying taxes within the State they reside in. This would create a negligible, short-term, beneficial impact.

*Parklawn Building (Action Alternative)*

The proposed action involves the collocation of HHS employees to the Parklawn Building. In the long-term there would be no change to property taxes, sales taxes, or income taxes under this alternative as there would be no change over existing conditions. However, in the short-term, construction workers would be employed during the construction period. The workers would be residing and paying taxes within the State they reside in. This would create a negligible, short-term, beneficial impact.

### 3.13.5 What Measures Would be Taken to Reduce the Impact on the Local and Regional Economy?

Because the proposed activity would result in negligible beneficial impacts to the local and regional economy, mitigate measures have not been identified.

## 3.14 Environmental Justice

### 3.14.1 What Is Environmental Justice?

EO 12898 directs that "...each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations...". Although GSA is not a member of the Interagency Federal Working Group (IWG) on Environmental Justice, the agency, in accordance with the EO, complies with the provisions of the EO and assesses Environmental Justice issues as part of its NEPA review and analysis.

### 3.14.2 Are There Any Low-Income and/or Minority Populations Located Near Each Project Site?

Low-income and minority populations were identified through the review of U.S. Census Data. The minority community in Montgomery and Prince George's Counties is approximately 35.1 percent and 72.3 percent, respectively. The minority community in Montgomery County is slightly lower while the minority community in Prince George's County is almost double the minority community in the State of Maryland (38.8 percent) (Census, 2010). According to the 2000 Census<sup>2</sup>, the median household income in Montgomery County was \$71,551 and \$55,256 in Prince George's County. The median income in Maryland was \$52,868. The percentage of all individuals living below the poverty level in Montgomery and Prince George's Counties is approximately 5.2 percent and 7.4 percent, which is lower than the national average of 13.2 percent and the State of Maryland average of 8.0 percent (Census, 2010). Table 7 provides the total population, poverty level percentages, and

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<sup>2</sup> While the 2010 Census was recently conducted throughout the U.S., the data has not been analyzed and is not currently available. Therefore, 2000 Census information was used in this analysis. The information was pulled from the U.S. Census website in June 2010, which is why the reference for 2000 Census statistics shows the year 2010.

minority populations within the State of Maryland, Montgomery and Prince George’s Counties, and at each of the offered sites.

**Table 7. Percentages of Low-Income and Minority Populations**

	Total Population (Ppl)	Individuals Living Below Poverty Level (%)	Minority Population (%)
Maryland	5,164,376	13.2	38.8
Montgomery County	872,341	5.270	35.1
Prince George’s County	801,515	7.4	72.3
Irvington Centre at King Farm (7007.05)	6,871	11.5	47.3
New Carrollton Metro (8036.12)	3,308	12.5	86.1
One Largo Metro (8035.14)	2,736	2	97.4
Parklawn Building (7012.04)	7,632	10	35
University Town Center (8059.01)	6,160	9.8	78.6

Census, 2010

#### *Irvington Centre at King Farm*

The King Farm site is located within Census Tract 7007.05. Based upon Census data, the percentage of low-income population is lower than the state average, but higher than the county average. The minority population is higher than the average for Montgomery County and the State of Maryland (See Table 7 Percentages of Low-Income and Minority Populations) (Census, 2010).

#### *New Carrollton Metro*

The New Carrollton Metro site is located within Census Tract 8036.12. Based upon 2000 Census data, the percentage of low-income population is lower than the state average, but higher than the county average. The minority population is higher than the average for Prince George’s County and

the State of Maryland (See Table 7 Percentages of Low-Income and Minority Populations) (Census, 2010).

#### *One Largo Metro*

The One Largo Metro site is located within Census Tract 8035.14. Based upon the Census data, the percentage of low-income population is lower and the minority population is higher than the averages State of Maryland and Prince George's County (See Table 7 Percentages of Low-Income and Minority Populations) (Census, 2010).

#### *Parklawn Building*

The Parklawn Building is located within Census Tract 7012.04. Based upon Census data, the percentage of low-income population is lower than the state average, but higher than the county average. The minority population is lower than the average for Montgomery County and the State of Maryland (See Table 7 Percentages of Low-Income and Minority Populations ) (Census, 2010).

#### *University Town Center*

The University Town Center Site is located within Census Tract 8059.01. Based upon Census data, the percentage of low-income population is lower than the state average, but higher than the county average. The minority population is higher than the average for Prince George's County and the State of Maryland (See Table 7 Percentages of Low-Income and Minority Populations) (Census, 2010).

### **3.14.3 Would These Populations Be Disproportionately Impacted by the Proposed Project?**

While there are minority and low-income populations in the vicinity of each of the proposed sites, the HHS Lease Consolidation at any of the offered sites would not disproportionately affect these groups. For example, low-income and minority populations may be affected by increased traffic as described in Section 3.12, Traffic and Transportation; however, this impact would be similar to that experienced by the overall population. Low-income and minority populations would not be disproportionately affected by long-term increases in noise levels or changes in air quality. Therefore, the HHS Lease Consolidation to any of the proposed sites would not have disproportionate ecological or human health effects on low-income or minority populations.

### 3.14.4 What Measures Would be Taken to Reduce the Impacts to Low-Income and/or Minority Populations?

None required.

## 3.15 Traffic and Transportation

### 3.15.1 What Makes Up the Local Roadway Network?

The main roadways in the vicinity of each of the proposed sites include the following:

The Irvington Centre at King Farm site is located in the northwest and southwest quadrants of the King Farm Boulevard/Piccard Drive intersection with one office building and one parking garage located in each quadrant. King Farm Boulevard bisects the property. The main roadways in the vicinity of the King Farm site are:

- Interstate 270 (I-270). In the vicinity of the site, I-270 is a 12-lane divided interstate highway with four express and two collector-distributor lanes in each direction separated by barrier with a posted speed of 55 miles per hour (mph). It carries approximately 230,900 vehicles per day (VPD) at Shady Grove Road.
- Interstate 370 (I-370)/Intercounty Connector (ICC). I-370 is a six-lane interstate highway which runs in an east-west direction. The ICC, currently under construction, will be a toll facility and will connect to I-370 and continue east as a six-lane expressway. It will operate as a bypass to I-495 by directly connecting I-270 with I-95. The ICC is expected to be complete in 2012.
- South Frederick Road (MD 355). MD 355 is a six-lane divided roadway which runs in a north-south direction. It has a posted speed of 40 mph. Its intersections with Shady Grove Road, Ridgmont Avenue, King Farm Boulevard, and Redland Road are signalized. MD 355 carries approximately 46,900 VPD at King Farm Boulevard.
- Shady Grove Road. This roadway runs in a north-south direction and has a posted speed limit of 40 mph. Shady Grove Road is a six-lane roadway with a grade separated interchange at I-270. Its intersections with the I-270 Ramps, Choke Cherry Road, Gaither Road, Comprint Court, Pleasant Road, and MD 355 are signalized.

- King Farm Boulevard. This is a two-lane divided roadway which runs in an east-west direction. King Farm Boulevard has a parking lane in each direction. Its intersection with Gaither Road, Pleasant Drive, and MD 355 are signalized.
- Redland Boulevard. This is a four-lane divided roadway which runs in an east-west direction. Its intersections with Piccard Drive, Gaither Road, Crestfield Drive, Pleasant Drive, and MD 355 are signalized.
- Piccard Drive. This is a two-lane roadway which runs in a north-south direction. Its intersection with Redland Road is signalized.

The New Carrollton Metro site is located along Ellin Road between Hanson Oaks Drive and the New Carrollton Metro Station. The main roadways in the vicinity of the New Carrollton Metro site are:

- Veterans Parkway (MD 410). This is a four-lane roadway which runs in an east-west direction and has a posted speed of 45 mph. Its intersections with Ellin Road and Annapolis Road (MD 450) are signalized. Its intersection with John Hanson Highway (US 50) is grade separated. MD 410 carries approximately 20,800 VPD west of MD 450.
- Annapolis Road (MD 450). This is a six-lane roadway which runs in an east-west direction and has a posted speed of 35 mph. Its intersections with MD 410, Harkins Road, Riverdale Road, and 85<sup>th</sup> Avenue are signalized. It carries approximately 37,000 VPD west of MD 410.
- Ellin Road/85<sup>th</sup> Avenue. This is a four-lane roadway named Ellin Road from MD 410 to just north of Harkins Road where it becomes a two-lane roadway named 85<sup>th</sup> Avenue. It runs in a north-south direction and has a posted speed of 30 mph. Its intersections with MD 410, Harkins Road, and MD 450 are signalized.
- Harkins Road. This is a four lane divided roadway which runs in a north-south direction between MD 450 and Ellin Road. Its intersections with MD 450, W Lanham Drive, and Ellin Road are signalized.

The One Largo Metro is located in the northwest corner of the intersection of Lottsford Road and N. Harry S. Truman Drive. The main roadways in the vicinity of the One Largo Metro site are:

- Interstate 95/495 (I-95/495). I-95/495 is an eight-lane freeway which runs in a north-south direction in the vicinity of the site and has a posted speed limit of 55 mph. It has

interchanges with Central Avenue (MD 214), Arena Drive, and Landover Road (MD 202). It carries approximately 210,000 VPD at MD 202.

- Landover Road (MD 202). In the vicinity of the site this roadway is six-lanes divided and runs in a north-south direction. The posted speed limit is 50 mph and it carries approximately 54,700 VPD south of Arena Drive. Its intersections with McCormick Drive, Lottsford Road, Technology Way, and Arena Drive/Lake Arbor Way are signalized. Its intersections with I-95/495 and MD 214 are grade separated.
- Arena Drive: The six-lane divided roadway runs in an east-west direction and has a posted speed of 35 mph. The roadway is four lanes in the vicinity of the I-95/495 interchange. It intersections with the I-95/495 ramps, two entrances to the Boulevard at the Capital Center shopping center, Lottsford Road, Largo Center Drive/Apollo Drive, and MD 202 are signalized. It is grade separated from I-95/495.
- Lottsford Road. This six-lane divided roadway runs in a north-south direction and has a posted speed of 40 mph. Its intersection with Landover Road, Arena Drive, Grand Boulevard, N. Harry S. Truman Drive, and W Largo Drive are signalized.
- N. Harry S. Truman Drive. This roadway is a one-way roadway with 3 through lanes from Largo Drive (south) to Largo Drive (north). To the north and south of Largo Drive it is a two-way roadway. It runs in a north-south direction and its intersections with Lottsford Road and Largo Drive (south) are signalized. Its intersection with MD 214 is grade separated.
- Central Avenue. This six-lane divided roadway runs in an east-west direction and has a posted speed of 40 mph. It carries approximately 76,500 VPD west of Harry S. Truman Drive. Its intersections with I-95/495, Harry S. Truman Drive, and MD 202 are grade separated.

The Parklawn Building site is located between Fishers Lane and Parklawn Drive, just east of Twinbrook Parkway. The main roadways in the vicinity of the Parklawn Building site are:

- Veirs Mill Road (MD 586). This is a four-lane divided roadway with a posted speed limit of 40 mph. It runs in an east-west direction. MD 586 carries approximately 47,800 VPD west of Twinbrook Parkway. Its intersections with Twinbrook Parkway and Atlantic Avenue are signalized.

- Rockville Pike (MD 355). This is a six-lane divided roadway which runs in a north-south direction and has a posted speed limit of 40 mph. MD 355 carries approximately 52,000 VPD north of Twinbrook Parkway. Its intersections with Randolph Road, Hubbard Drive, Bou Avenue, Twinbrook Parkway, and Halpine Road are signalized.
- Twinbrook Parkway. This is a four-lane roadway which widens to a six-lane roadway between Ardennes Avenue and Parklawn Drive with a posted speed limit of 30 mph. Twinbrook Parkway runs in a north-south direction with signalized intersections at Veirs Mill Road, Ardennes Avenue, Fishers Lane, Parklawn Drive, Chapman Avenue, and Rockville Pike.
- Parklawn Drive. This is a four-lane roadway with a posted speed limit of 30 mph. Parklawn Drive generally runs in an east-west direction in the vicinity of Twinbrook Parkway. Its intersections with Twinbrook Parkway, Wilkens Avenue, Braxfield Court, and Randolph Road are signalized as well as a signalized pedestrian crossing near the Parklawn Building.

The University Town Center site is located in the northeast corner of the intersection of Belcrest Road and Toledo Road. The main roadways in the vicinity of the University Town Center site are:

- East-West Highway (MD 410). This four-lane divided roadway runs in an east-west direction and has a posted speed of 40 mph. In the vicinity of the project site (between Adelphi Road/Queens Chapel Road (MD 500) and Toledo Terrace) there is a third through-lane in the westbound direction. Its intersections with Toledo Terrace, the Prince Georges Plaza Entrance, Belcrest Road, and MD 500 are signalized. There is also a pedestrian signal between Toledo Terrace and the Prince Georges Plaza Entrance. MD 410 carries approximately 44,000 VPD east of Adelphi Road.
- Belcrest Road. This four-lane divided roadway runs in a north-south direction with a posted speed of 35 mph. Its intersections with MD 410, Toledo Road, and Adelphi Road are signalized.
- Adelphi Road. This four-lane divided roadway runs in a north-south direction with a posted speed of 30 mph. Its intersection with MD 410, Toledo Road, and Belcrest Road are signalized.

As of June 2010, all of the intersections studied operate at an acceptable level with the exception of Lottsford Road/MD 202 which operates at or above capacity in the evening peak hour.

### 3.15.2 How were impacts to the Local Roadway Network Assessed?

A traffic analysis was conducted for the HHS Lease Consolidation project. The results of the analysis are summarized in the following sections. Impacts to the local roadway networks were assessed by adding traffic that would be generated by the proposed HHS Lease Consolidation, along with other planned developments, to existing traffic levels.

Analysis was performed using the Critical Lane Analysis Technique as directed by Montgomery and Prince George's Counties guidelines. The CLV analysis examines the combination of vehicular streams with conflicting movement during a peak period. The maximum number of conflicts is termed the critical lane volume (CLV). This CLV value is then compared to a range of values, to determine the approximate Level of Service (LOS) at an intersection. LOS is described in the Highway Capacity Manual (HCM) as a "qualitative measure describing operational conditions within a traffic stream, and their perception by motorist and/or passengers." The HCM defines six LOSs ranging from A to F, with A presenting the optimal operating conditions with minimal delays and F representing congestion.

The Critical Lane Analysis Technique determines the overall operational LOS for an entire signalized intersection. Unsignalized intersections are assumed to be simple two-phase signalized intersections for the analysis.

Montgomery and Prince George's Counties have different requirements and thresholds for traffic assessments. The thresholds in Montgomery County are based on the Policy Area guidelines where the intersection is located. The thresholds in Prince George's County are based on whether the area is considered to be developed, developing, or rural. The thresholds for each site based on the County requirements are shown in Table 8 below:

**Table 8. Critical Lane Volume (CLV) Thresholds**

Site	Threshold CLV
Irvington Centre at King Farm	1,500
New Carrollton Metro Center	1,600
One Largo Metro	1,450
Parklawn Building	1,550/1,800*
University Town Center	1,600

\* The Parklawn Building study area falls within two different Policy Areas

In Montgomery County the CLV is considered “Acceptable” or “Unacceptable” based on the CLV threshold for the appropriate Policy Area where the intersection is located (See Table 8). In the City of Rockville this limit is 1,500 or less, in North Bethesda this limit is 1,550 or less, and in Twinbrook this limit is 1,800 or less.

In Prince George’s County, this CLV value is compared to a range of values, to determine the approximate LOS at an intersection (see Table 9). Intersections in Prince George’s County with a CLV of 1,600 (LOS E) or lower are considered to be operating at acceptable level of service in “developed areas” and those operating with a CLV of 1,450 (LOS D) or lower are considered to be acceptable in “developing areas” (see Table 10).

**Table 9. Level of Service Ranges (for sites located in Prince George’s County)**

Service Level	Description	Critical Lane Volume (CLV)
A	Free flow, very low delay	Less than 1,000
B	Stable flow, some platooning, less than 10% of cycles loaded	1,000-1,150
C	Stable flow with less than 30% of the cycles loaded. Number of vehicles stopped is significant	1,151-1,300
D	Approaching unstable flow with less than 70% of the cycles loaded. Longer delays	1,301-1,450
E	Capacity with less than 100% of cycles loaded. Long delays.	1,451-1,600
F	Unacceptably high levels of delay	Greater than 1600

**Table 10. Prince George’s County Policy Standards and Technical Criteria**

Site Type	LOS Standards	CLV Threshold Values
Developed	E	1,600
Developing	D	1,450
Rural	C	1,300

Each of the sites was analyzed for two different cases, Future Conditions without the HHS Lease Consolidation (No-Action) and Future Conditions with the HHS Lease Consolidation (Action Alternative).

Under the No-Action analysis each of the intersections were analyzed to determine future traffic levels without the proposed HHS Lease Consolidation, this provides a baseline for the comparison of the potential traffic impacts from the proposed action. The No-Action Alternative volumes were obtained by combining the existing traffic volumes with the traffic levels from planned development. Approved developments which are not yet constructed or occupied are included in the planned development traffic. A list of approved developments was obtained from the City of Rockville, Montgomery County, and Prince George's County resources.

The Action Alternative analysis is an analysis of the future anticipated traffic volumes at the study intersections with the HHS Lease Consolidation. The Action Alternative analysis includes, existing traffic volumes, approved developments which have not been constructed or occupied in the surrounding area, and the traffic that would be generated by the proposed HHS Lease Consolidation.

The number of trips generated was based on the approximate square footage of the new building and the trip generation rates from the Montgomery County guidelines for office space and the Prince George's County guidelines for general office space. No reductions in traffic were made for transit or carpooling in the trip generation. Table 11 summarizes the site trip generation which is the peak hour trips generated by the HHS Lease Consolidation for the King Farm site, Table 12 summarizes them for the Prince George's County sites (New Carrollton Metro, One Largo Metro, and University Town Center sites), and Table 13 summarizes them for the Parklawn site.

**Table 11: HHS Consolidation Site Trip Generation (King Farm site)**

	Morning	Evening
HHS Employees	2,900	2,900
Gross Floor Area	935,401	935,401
Percent in Peak Hour (peak direction)	87%	83%
Percent in Peak Hour (non-peak direction)	13%	17%
Peak Hour Vehicle Trips (peak direction)	1,484	1,223
Peak Hour Vehicle Trips (non-peak direction)	222	251
<b>Total Peak Hour Vehicle Trips</b>	<b>1,705</b>	<b>1,474</b>

**Table 12: HHS Consolidation Site Trip Generation (New Carrollton Metro, One Largo Metro, University Town Center sites)**

	Morning	Evening
HHS Employees	2,900	2,900
Gross Floor Area	935,401	935,401
Percent in Peak Hour (peak direction)	90%	81%
Percent in Peak Hour (non-peak direction)	10%	19%
Peak Hour Vehicle Trips (peak direction)	1,684	1,403
Peak Hour Vehicle Trips (non-peak direction)	187	327
<b>Total Peak Hour Vehicle Trips</b>	<b>1,871</b>	<b>1,730</b>

**Table 13: HHS Consolidation Site Trip Generation (Parklawn site)**

	morning	evening
Additional HHS Employees	200	200
Gross Floor Area	935,401	935,401
Percent in Peak Hour (peak direction)	87%	83%
Percent in Peak Hour (non-peak direction)	13%	17%
Peak Hour Vehicle Trips (peak direction)	67	61
Peak Hour Vehicle Trips (non-peak direction)	10	12
<b>Total Peak Hour Vehicle Trips</b>	<b>77</b>	<b>73</b>

### 3.15.3 How Would the Local Roadway Network Be Affected by the Proposed Project?

#### *Irvington Centre at King Farm*

##### *Future Conditions without the HHS Lease Consolidation (No-Action)*

Results of the analysis indicate that most of the intersections analyzed would operate at acceptable LOSs during both the morning (peak hour between 7 a.m. and 9 a.m.) and evening (peak hour between 4 p.m. and 7 p.m.) peak hours (see Table 14). The following intersection is expected to operate at unacceptable LOSs during one or both peak hours:

- Shady Grove Road/Choke Cherry Road (evening peak hour)

##### *Future Conditions with the HHS Lease Consolidation (Action Alternative)*

Results of the analysis indicate that, with the addition of HHS employees, most of the intersections would operate at unacceptable LOSs during the peak hours. Overall, there would be changes in CLV at all of the intersections due to the HHS traffic. A summary of these results can be seen in Table 14.

Under the Future Conditions with the HHS Lease Consolidation (Action Alternative) analysis, the following intersections are expected to operate at an unacceptable LOS:

- King Farm Boulevard/Piccard Drive (morning and evening peak hours)
- Shady Grove Road/Choke Cherry Road (evening peak hour)
- King Farm Boulevard/South Frederick Road (MD 355) (evening peak hour)

Overall, under this alternative, the LOS would be affected creating a minor, long-term adverse impact.

**Table 14: Irvington Centre at King Farm Traffic Volume LOS Results**

Intersection	Existing*		Future Condition without HHS Lease Consolidation (No-Action)		Future Condition with HHS Lease Consolidation (Action Alternative)		% Change in CLV Between Existing and Future without HHS Lease Consolidation		% Change in CLV Between Future without and Future with Lease Consolidation	
	morning (CLV)	Evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)
Irvington Centre at King Farm										
King Farm Boulevard/Piccard Drive	Acceptable 326	Acceptable 472	Acceptable 407	Acceptable 628	Unacceptable 2,295	Unacceptable 2,222	19.9%	24.8%	82.3%	71.7%
Shady Grove Road/ Choke Cherry Road	Acceptable 958	Acceptable 1,349	Acceptable 1,098	Unacceptable 1,517	Acceptable 1,336	Unacceptable 1,789	12.8%	11.1%	17.8%	15.2%
Piccard Drive/ Redland Road	Acceptable 706	Acceptable 607	Acceptable 713	Acceptable 611	Acceptable 900	Acceptable 1,002	1.0%	0.7%	20.8%	39.0%
King Farm Boulevard/South Frederick Road (MD 355)	Acceptable 1,191	Acceptable 1,266	Acceptable 1,232	Acceptable 1,288	Acceptable 1,451	Unacceptable 1,542	3.3%	1.7%	15.1%	16.5%

 Depicts intersections operating at an unacceptable LOS

*New Carrollton Metro*

*Future Conditions without the HHS Lease Consolidation (No-Action)*

Results of the analysis indicate that most of the intersections analyzed will operate at acceptable LOSs during both the morning and evening peak hours (see Table 15). None of the intersections are expected to operate at unacceptable LOSs.

*Future Conditions with the HHS Lease Consolidation (Action Alternative)*

Results of the analysis indicate that, with the addition of HHS employees, two of the intersections would operate at unacceptable LOSs during the peak hours. A summary of LOS analysis and the percent changes at each of the intersection can be seen in Table 15.

Under the Future Conditions with the HHS Lease Consolidation (Action Alternative) analysis, the following intersection is expected to operate at an unacceptable LOS:

- Veterans Parkway (MD 410)/Ellin Road (evening peak hour)
- 85<sup>th</sup> Avenue/Annapolis Road (MD 450) (evening peak hour)

Overall, under this alternative, the LOS would be affected creating a minor, long-term adverse impact.

**Table 15: New Carrollton Metro Traffic Volume LOS Results**

Intersection	Existing*		Future Condition without HHS Lease Consolidation (No-Action)		Future Condition with HHS Lease Consolidation (Action Alternative)		% Change in CLV Between Existing and Future without HHS Lease Consolidation		% Change in CLV Between Future without and Future with HHS Lease Consolidation	
	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)
<b>New Carrollton Metro</b>										
Veterans Parkway (MD 410)/Ellin Road	C 1,178	B 1,121	C 1,188	B 1,134	E 1,502	F 1,647	0.8%	1.1%	20.9%	31.1%
Ellin Road/Harkins Road	A 525	A 669	A 540	A 679	A 730	A 799	2.8%	1.5%	26.0%	15.0%
85th Avenue/Annapolis Road (MD 450)	B 1,102	E 1,476	C 1,152	E 1,513	E 1,456	F 1,771	4.3%	2.4%	20.9%	14.6%

\*Existing conditions as of June 2010

 Depicts intersections operating at an unacceptable LOS

*One Largo Metro*

*Future Conditions without the HHS Lease Consolidation (No-Action)*

Results of the analysis indicate that most of the intersections analyzed would operate at acceptable LOSs during both the morning and evening peak hours (see Table 16). The following intersection is expected to operate at unacceptable LOSs during one or both peak hours:

- Lottsford Road/Landover Road (evening peak hour)

*Future Conditions with the HHS Lease Consolidation (Action Alternative)*

Results of the analysis indicate that, with the addition of HHS employees, three of the intersections would operate at unacceptable LOSs during the peak hours. Overall, there would be changes in CLV at three of the intersections due to the HHS traffic (Lottsford Road/N. Harry S. Truman Drive, Lottsford Road/Arena Drive, and Arena Drive/MD 202). A summary of these results can be seen in Table 16.

Under the Future Conditions with the HHS Lease Consolidation (Action Alternative) analysis, the following intersections are expected to operate at an unacceptable LOS:

- Lottsford Road/N. Harry S. Truman Drive (morning and evening peak hours)
- Lottsford Road/Arena Drive (evening peak hour)
- Lottsford Road/Landover Road (evening peak hour)

Overall, under this alternative, the LOS would be affected creating a minor, long-term adverse impact.

**Table 16: One Largo Metro Traffic Volume LOS Results**

Intersection	Existing*		Future Condition without HHS Lease Consolidation (No-Action)		Future Condition with HHS Lease Consolidation (Action Alternative)		% Change in CLV Between Existing and Future without HHS Lease Consolidation		% Change in CLV Between Future without and Future with HHS Lease Consolidation	
	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)		morning (CLV)	evening (CLV)
<b>One Largo Metro</b>										
Lottsford Road/North Harry S. Truman Drive	A 738	A 660	A 738	A 660	F 1,910	E 1,587	0.0%	0.0%	61.4%	58.4%
Lottsford Road/Arena Drive	A 632	A 828	A 809	B 1,090	C 1,295	E 1,507	21.9%	24.0%	37.5%	27.7%
Lottsford Road/McCormick Drive	A 504	A 526	A 691	A 630	A 741	A 640	27.1%	16.5%	6.7%	1.6%
Lottsford Road/Landover Road (MD 202)	C 1,263	F 1,686	D 1,341	F 1,900	D 1,341	F 1,900	5.8%	11.3%	0.0%	0.0%
Arena Drive/Lake Arbor Way/Landover Road (MD 202)	B 1,091	B 1,148	C 1,188	D 1,315	D 1,409	D 1,373	8.2%	12.7%	15.7%	4.2%

\*Existing conditions as of June 2010   Depicts intersections operating at an unacceptable LOS

*Parklawn Building*

*Future Conditions without the HHS Lease Consolidation (No-Action)*

Results of the analysis indicate that most of the intersections analyzed will operate at acceptable LOSs during both the morning and evening peak hours (see Table 17). The following intersections are expected to operate at unacceptable LOSs during one or both peak hours:

- Twinbrook Parkway/Veirs Mill Road (MD 586) (evening peak hour)
- Twinbrook Parkway/Rockville Pike (MD 355) (evening peak hour)

*Future Conditions with the HHS Lease Consolidation (Action Alternative)*

Under the Parklawn alternative, 200 additional HHS employees would be transferred to the existing Parklawn Building. These 200 employees would generate additional peak hour trips as shown in Table 11. Under this alternative, the projected traffic increase is not expected to have an impact on the LOS.

**Table 17: Parklawn Building Traffic Volume LOS Results**

Intersection	Existing*		Future Condition without HHS Lease Consolidation (No-Action)		Future Condition with HHS Lease Consolidation (Action Alternative)		% Change in CLV Between Existing and Future without HHS Lease Consolidation		% Change in CLV Between Future without and Future with HHS Lease Consolidation	
	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)
<b>Parklawn Building</b>										
Twinbrook Parkway/Veirs Mill Road (MD 586)	Acceptable 1,435	Acceptable 1,398	Acceptable 1,496	Unacceptable 1,605	Acceptable 1,499	Unacceptable 1,611	4.1%	12.9%	0.2%	0.4%
Twinbrook Parkway/Fishers Lane	Acceptable 590	Acceptable 913	Acceptable 967	Acceptable 1,283	Acceptable 1,027	Acceptable 1,296	39.0%	28.8%	5.8%	1.0%
Twinbrook Parkway/Rollins Avenue/Rockville Pike (MD 355)	Acceptable 996	Acceptable 1,248	Acceptable 1,450	Unacceptable 2,265	Acceptable 1,478	Unacceptable 2,300	31.3%	44.9%	1.9%	1.5%

\*Existing conditions as of June 2010

  Depicts intersections operating at an unacceptable LOS

*University Town Center**Future Conditions without the HHS Lease Consolidation (No-Action)*

Results of the analysis indicate that most of the intersections analyzed will operate at acceptable LOSs during both the morning and evening peak hours (see Table 18). The following intersection is expected to operate at unacceptable LOSs during one or both peak hours:

- East-West Highway (MD 410)/Belcrest Road (evening peak hour)

*Future Conditions with the HHS Lease Consolidation (Action Alternative)*

Results of the analysis indicate that, with the addition of HHS employees, most of the intersections would operate at unacceptable LOSs during the peak hours. Overall, there would be changes in CLV at each of the intersections due to the HHS traffic. A summary of these results can be seen in Table 18.

Under the Future Conditions with the HHS Lease Consolidation (Action Alternative) analysis, the following intersections are expected to operate at an unacceptable LOS:

- East-West Highway (MD 410)/Belcrest Road (morning and evening peak hours)
- Belcrest Road/Toledo Road (evening peak hour)

Overall, under this alternative, the LOS would be affected creating a minor, long-term adverse impact.

**Table 18. University Town Center Building Traffic Volume LOS Results**

Intersection	Existing*		Future Condition without HHS Lease Consolidation (No-Action)		Future Condition with HHS Lease Consolidation (Action Alternative)		% Change in CLV Between Existing and Future without HHS Lease Consolidation		% Change in CLV Between Future without and Future with HHS Lease Consolidation	
	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)	morning (CLV)	evening (CLV)
University Town Center										
East-West Highway (MD 410)/Belcrest Road	B 1,015	C 1,256	E 1,458	F 1,961	F 1,810	F 2,110	30.4%	36.0%	19.4%	7.1%
Belcrest Road/Toledo Road	A 434	B 1,045	A 735	E 1,504	A 963	F 1,924	41.0%	30.5%	23.7%	21.8%
Belcrest Road/Adelphi Road	A 648	A 928	A 897	C 1,250	A 928	D 1,313	27.8%	25.8%	3.3%	4.8%

\*Existing conditions as of June 2010

  Depicts intersections operating at an unacceptable LOS

### 3.15.4 What Public Transportation Facilities and Services are Available in the Vicinity of Each of the Proposed Sites? How Would They Be Affected By the Proposed Project?

There are existing public transportation facilities which service each of the proposed consolidation sites. These facilities may include Metrorail, commuter rail, and/or bus routes.

#### Metrorail System

The Metrorail system connects downtown Washington, D.C. to the adjoining areas in Maryland and Virginia (see Appendix A, Figure A-21). There are five lines on the Metrorail system which are all connected at some point within Washington, DC. Metrorail opens at 5:00 a.m. on weekdays and at 7:00 a.m. on weekends and closes at 12:00 a.m. Monday-Thursday and at 3:00 a.m. Friday and Saturday. Trains arrive approximately every six minutes during the peak and every twelve minutes during the non-peak hours.

The Metrorail Red Line operates between Shady Grove and Glenmont in Montgomery County. This line has 27 stations and has transfer points with the Orange and Blue Lines at Metro Center and the Yellow and Green Lines at Gallery Place and Fort Totten.

The Metrorail Blue Line operates between Franconia-Springfield in Fairfax County and Largo Town Center in Prince George's County. This line has 27 stations and has transfer points with the Red Line at Metro Center and the Yellow and Green Lines at L'Enfant Plaza. The line runs along the same path as the Yellow Line between King Street and Pentagon, and runs along the same path as the Orange Line between Rosslyn and Stadium-Armory.

The Metrorail Orange Line operates between Vienna/Fairfax-GMU in Fairfax County and New Carrollton in Prince George's County. This line has 26 stations and has transfer points with the Red Line at Metro Center and the Yellow and Green Lines at L'Enfant Plaza. The line runs along the same path as the Blue Line between Rosslyn and Stadium-Armory.

The Metrorail Green Line operates between Branch Avenue and Greenbelt in Prince George's County. This line has 21 stations and has transfer points with the Red Line at Gallery Place and Fort Totten and with the Orange and Blue Lines at L'Enfant Plaza. The line runs along the same path as the Yellow Line from L'Enfant Plaza to Fort Totten.

The Metrorail Yellow Line operates between Huntington in Fairfax County and Fort Totten in Washington, DC. This line has 17 stations and has transfer points with the Red Line at Gallery Place and the Orange and Blue Lines at L'Enfant Plaza. The line runs along the same path as the Blue Line between King Street and Pentagon, and it runs along the same path as the Green Line from L'Enfant Plaza to Fort Totten.

A new Purple Line is being proposed. The Preferred Alternate would run across Montgomery and Prince George's Counties connecting Bethesda to New Carrollton. The project is currently in the preliminary engineering phase and is anticipated to complete final design in five years and begin construction once funding is in place.

Under the No-Action Alternative, no changes to the Metrorail system are anticipated. Under any of the Action Alternatives, no changes to the Metrorail system are expected. Depending on which site is selected, the Metrorail Blue, Orange, or Yellow Lines may see an increase in patronage during rush-hour times. This impact would be minor, long-term, and adverse.

### **MARC Rail System**

The MARC Rail system is a commuter rail system that connects Washington, DC to the surrounding counties in Maryland and West Virginia (see Appendix A, Figure A-22). There are three lines

operated by MARC and all of the lines connect at Union Station (which also connects to the Metrorail system).

The MARC Brunswick Line operates between Brunswick, Maryland and Union Station in Washington, DC. This line also includes extensions to Frederick, Maryland and Martinsburg, West Virginia. This line connects with the Metrorail system at Rockville, Silver Spring, and Union Station along the Red Line. The Brunswick Line operates in the eastbound direction in the morning peak hour beginning at 5:00 a.m. and in the westbound direction in the evening peak hour beginning at 1:45 p.m..

The MARC Camden Line operates between Camden Yards in Downtown Baltimore, Maryland and Union Station in Washington, DC. This line connects with the Metrorail system at Union Station on the Red Line and Greenbelt and College Park on the Green Line. The Camden Line operates northbound beginning at 6:42 a.m. in the morning peak hour and at 4:13 p.m. in the evening peak hour. It operates southbound beginning at 5:10 a.m. in the morning peak hour and at 3:30 p.m. in the evening peak hour.

The MARC Penn Line operates primarily between Baltimore's Penn Station and Union Station in Washington, DC with four additional stops up to Perryville in Harford, Maryland operating on limited service. It connects to the Metrorail system at New Carrollton along the Orange Line and Union Station along the Red Line. Service along the Penn Line begins southbound at 4:40 a.m. in the morning peak hour and at 12:40 p.m. along in the evening peak hour. In the northbound direction, service begins at 6:02 a.m. in the morning peak hour and at 12:20 p.m. in the evening peak hour.

Under the No-Action Alternative and the Action Alternatives, no changes to the MARC system are anticipated. If the New Carrollton Metro, One Largo Metro, or University Town Center site is selected, there could be an increase in patronage to the MARC rail system. This impact would be minor, long-term, and adverse.

### **Public Transportation Facilities**

#### *Irvington Centre at King Farm*

The Shady Grove Metrorail Station, which is along the Red Line, is approximately 1 mile from the proposed King Farm Site. MARC Rail Brunswick Line has a station at Rockville which is one station from Shady Grove along the Red Line. The Corridor Cities Transitway (CCT) is planned to connect the King Farm community to the Shady Grove Metrorail Station and COMSAT in Germantown, Maryland. Additionally, there is a King Farm Shuttle which operates between the Shady Grove Metrorail

Station and the proposed King Farm Site, as well as, many Montgomery County Ride-On bus routes which service the Shady Grove Metrorail Station (see Appendix A, Figure A-23).

#### *New Carrollton Metro*

The New Carrollton Metrorail Station, which is along the Orange Line, is approximately 934 WLF from the proposed New Carrollton Metro site. MARC Rail Penn Line and Amtrak also have stations at New Carrollton. Additionally, there are several Metrobus and Prince George's County's The Bus routes which operate in the vicinity of the proposed site (see Appendix A, Figure A-24).

#### *One Largo Metro Site*

The Largo Town Center Metrorail Station, which is along the Blue Line, is approximately 488 walkable linear feet (WLF) to the One Largo Metro Site. Additionally, there are several bus routes operated by Metrobus and Prince George's County's The Bus which service the proposed site (see Appendix A, Figure A-25).

#### *Parklawn Building*

The Twinbrook Metrorail Station, which is along the Red Line, is approximately 2,300 WLF from the entrance to the Parklawn Building. MARC Rail Brunswick has a station at Rockville which is one station from Twinbrook along the Red Line. Additionally, there are several bus routes operated by Metrobus and Montgomery County Ride-On which service the Parklawn building (see Appendix A, Figure A-26).

#### *University Town Center*

The Prince George's Plaza Metrorail Station, which is along the Green Line, is approximately 2,296 WLF from the proposed University Town Center Site. MARC Rail Camden Line has a station at College Park which is one station from Prince George's Plaza along the Green Line. Additionally, there are several bus routes operated by Metrobus and Prince George's County's The Bus which service the proposed facility (see Appendix A, Figure A-27).

Under the No-Action Alternative, no changes to the bus system are anticipated. Under the Action Alternatives, there is the potential that the frequency of bus routes to increase. This would create a minor, long-term, adverse impact to the bus system.

### 3.15.5 How Would Pedestrians and Bicycle Commuters Access Each of the Proposed Sites?

Irvington Centre at King Farm Site –There are sidewalks and pedestrian crossings which service the walking route between the Shady Grove Metrorail Station and the site as well as connect to the surrounding residential areas. There is a signed bike route along King Farm Boulevard, Gaither Road, and Piccard Drive as well as an asphalt path along Redland Road and Gaither Road. This bike route connects to the Millennium Trail, which encircles the City of Rockville.

One Largo Metro site - There are proposed sidewalk facilities which would connect the Largo Town Center Station with the proposed site. There are also sidewalks along Lottsford Road, Arena Drive, and N. Harry S. Truman Drive in the vicinity of the site. There are no dedicated bicycle facilities that connect with this site.

New Carrollton Metro site –There are sidewalk facilities that connect the New Carrollton Metrorail Station and the proposed site. There are additional sidewalk facilities located along Ellin Road, Harkins Road, 85<sup>th</sup> Avenue, and Annapolis Road (MD 450) which connect to the surrounding residential areas. There are no dedicated bicycle facilities which connect to this site.

Parklawn Building Site –There is sidewalk and pedestrian crossings along the walking route from the Twinbrook Metrorail Station to the Parklawn Building. Also, there are sidewalks along Twinbrook Parkway, Fishers Lane, and Parklawn Drive which connect to the surrounding residential and commercial areas. There are no dedicated bicycle facilities which connect to the site.

University Town Center Site –There are sidewalk facilities and pedestrian crossings which connect the Prince George’s Plaza Metrorail Station to the proposed site, as well as, a raised pedestrian crossing over East-West Highway (MD 410). There are additional sidewalk facilities along MD 410, Belcrest Road, and Adelphi Road which connect to the surrounding residential areas. Queens Chapel Road (MD 500), Belcrest Road, and Adelphi Road are On-Road Bicycle Routes which connect to the Anacostia Tributary Trail System.

### 3.15.6 How Would Pedestrian and Bicycle Access be Affected by the Proposed Project?

Pedestrian and bicycle access would not be impacted at any of the proposed sites. Developers/owners would be required to build sidewalks on site to connect to the existing sidewalk network.

### 3.15.7 What Measures Would be Taken to Reduce Impacts to the Transportation Network?

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, and University Town Center*

Currently, 10-20% of HHS employees use public transit and participate in the SmartBenefits program. HHS currently provides employees with transit subsidies, telecommuting programs, carpool/vanpool incentives, and flexible work hours. These programs would be continued under this alternative which would reduce the number of peak hour vehicle trips and mitigate some of the traffic impacts. However, these strategies may not be sufficient to negate the need for roadway improvements.

GSA would require the developer/owner to coordinate with the applicable local and/or State transportation planning agencies to determine the appropriate transportation mitigation measures to mitigate the traffic impacts associated with the HHS Lease Consolidation. The developer/owner would be required to implement any necessary roadway improvements and other potential transportation mitigation measures.

#### *Parklawn Building*

Under the proposed Action Alternative there are no additional improvements which would need to be made to bring the intersections up to an acceptable level of service. HHS currently provides employees with transit subsidies, telecommuting programs, carpool/vanpool incentives, and flexible work hours. These programs would be continued under this alternative which would reduce the number of peak hour vehicle trips and mitigate traffic impacts.

## 3.16 Utilities

### 3.16.1 Who Provides Utility Service to Each of the Proposed Sites?

Water and sewer utilities are provided to all of the alternative sites by Washington Suburban Sanitary Commission (WSSC). For all sites, electricity would be provided by Allegheny Power, PEPCO, or Baltimore Gas & Electric, and natural gas would be provided by Washington Gas. Telecommunications would be provided by Verizon (Montgomery County, Prince George's; 2010).

### 3.16.2 How Would Utilities be Impacted by the Proposed Project?

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the existing Parklawn Building and other buildings in Suburban Maryland. Under this alternative there would be no changes to the utilities serving the existing facilities. Recent studies have shown that there are significant heating and cooling losses at the Parklawn Building due to the design of the currently leased Parklawn Building, which is in the shape of a capital “E” (TEAG, 2001). In many cases, heating and cooling systems have reached the end of their useful life, resulting in energy inefficiencies (TEAG, 2001). The existing heating and cooling system would continue to pump conditioned air down from the prime movers on the roof to each vertical segment of the building (TEAG, 2001). There would continue to be no climate control once the air leaves the movers (TEAG, 2001). There would be no impact to utilities.

*Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building, University Town Center (Action Alternative)*

Operation of the buildings under any of the Action Alternatives would be in accordance with EOs 13423 and 13514 and the EISA of 2007. The EO 13423 requires each Federal agency to:

- Reduce energy consumption per square foot by 30 percent by 2015, relative to 2003 baseline;
- Reduce greenhouse gas emissions related to facility energy use by 30 percent by 2015, relative to the 2003 baseline;
- Reduce water consumption intensity by two percent per year through 2015, relative to the 2007 baseline;
- Procure at least half of statutorily required renewable energy comes from new renewable sources; and
- Place energy generation project on agency property for agency use, were feasible.

In addition to the above requirements, the EO 13514 requires each Federal agency to meet a number of energy, water, and waste reduction requirements, including:

- Reduce vehicle fleet petroleum use by 30 percent by 2020;
- Improve water efficiency by 26 percent by 202;
- Divert recyclable materials and waste by 50 percent by 2015;

It also requires Federal agencies to identify and analyze impacts from energy usage and alternative energy sources in all NEPA documents.

The utilities systems required to serve the new or renovated site would not over burden existing systems. Water consumption would be a result of sanitary uses, human consumption, and landscaping. Due to the water conservation measures described above and the SFO requirement for LEED® Silver certification, the HHS Lease Consolidation would consume a negligible portion of the total water consumption in WSSC's wastewater and potable water systems.

Electricity consumption would be a result of lighting systems, space heating, and mechanical and electrical devices. New energy efficient equipment would be used for the HHS Lease Consolidation to minimize its energy demand and to meet the requirements of EOs 13423 and 13514, EISA, and SFO 08-011 requirement for LEED® Silver certification. Therefore, the total energy consumption from electrical usage would consume a negligible portion of the total energy consumption throughout PEPCO, Allegheny Power, and BGEs' systems.

Natural gas may be used for space heating purposes. Because operation of the buildings under any of the Action Alternatives would be in compliance with EOs 13423 and 13514, EISA and SFO 08-011 requirement for LEED® Silver certification, the HHS Lease Consolidation would consume a negligible portion of the total energy consumption in Washington Gas' systems.

At all sites, except for the Parklawn Building site, small temporary disruptions to services to adjacent properties, from construction activities, may occur. Any disruptions would be advertised to affected areas and care would be taken to minimize these disruptions. The action would result in direct and indirect, minor, short-term, adverse local impacts.

### **3.16.3 What Conservation Measures Would be Incorporated Into the Development at Each Site to Mitigate Impacts to Utilities?**

While SFO 08-011 does not require the developer/owner to utilize alternative energy sources, the selected offeror would have to operate their facility in a sustainable and energy efficient manner for all Action Alternatives. Furthermore, in accordance with SFO 08-011, the developer/owner would be required to meet a minimum rating of Silver on the LEED® scale for building design. This LEED® rating would increase energy conservation and water conservation for both building construction. Energy conservation measures used to meet LEED® Silver requirements follow tenets of sustainability outlined in EO13423 and EO13514. Sustainable design measures incorporated into achieving LEED® Silver rating include: energy efficient lighting, HVAC systems, and passive solar

heating and lighting. Water conservation measures include low flow water fixtures, automatic fixture sensors, drought tolerant plants, and potentially rainwater harvesting. Last, all proposed sites are in close proximity to Metrorail stations providing employees and visitors opportunity to reduce energy consumption from personal car use. At the chosen facility a recycling program would be used and the developer would be responsible for maintaining energy conservation measures (e.g. use of energy star appliances and lights).

For the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center sites, the developer/owner would also be required to apply to WSSC to obtain a water allocation contract, which would need to be approved prior to construction.

#### **3.16.4 How Will Operation at Each of the Proposed Sites Impact Energy Usage?**

##### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the Parklawn Building and three other currently leased buildings in Suburban Maryland. Under this alternative there would be no changes to the HVAC systems serving the existing buildings. The existing heating and cooling system at Parklawn would continue to pump conditioned air down from the prime movers on the roof to each vertical segment of the building (TEAG, 2001). There would continue to be no climate control once the air leaves the movers (TEAG, 2001). This impact on energy efficiency would be minor, long-term, and adverse. However, each Federal agency is required to reduce building energy consumption per square foot by 30 percent by 2015 relative to the 2003 baseline in accordance with EO 13423. Once these measures are put in place, the adverse impact would be reduced.

##### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building, and University Town Center (Action Alternative)*

Each of the proposed action alternatives are required at a minimum to achieve a LEED® Silver rating, which would increase energy efficiency and sustainability. Furthermore, in accordance with SFO 08-011, the developer/owner would be required to meet a minimum rating of Silver on the LEED® scale for building design. This LEED® rating would increase energy conservation and water conservation for both building construction. Energy conservation measures used to meet LEED® Silver requirements follow tenets of sustainability outlined in EO13423 and EO13514. Sustainable design

measures incorporated into achieving LEED® Silver rating include: energy efficient lighting, HVAC systems, and passive solar heating and lighting. Water conservation measures include low flow water fixtures, automatic fixture sensors, drought tolerant plants, and potentially rainwater harvesting.

In addition, the HHS Lease Consolidation project would comply with EOs 13423 and 13514 and EISA by reducing building energy consumption, greenhouse gas emissions, and water consumption relative to GSA's baseline. Furthermore, EO 13514 requires federal agencies to identify and analyze impacts from energy usage and alternative energy sources in their NEPA documents for new or expanded Federal facilities. While SFO 08-011 does not require the developer/owner to utilize alternative energy sources, the selected offeror would have to operate their facility in a sustainable and energy efficient manner. A recent study conducted by GSA found that sustainably designed buildings outperform buildings of the same type and that fully integrating sustainable design helps GSA meet the mandates of EOs 13423 and 13514 by delivering buildings that use substantially less energy, and cost less to operate and maintain (GSA, 2008).

## 3.17 Waste Management

### 3.17.1 How Will Waste be Managed at Each of the Proposed Sites?

In Maryland general waste is regulated under the Code of Maryland Regulations (COMAR) Title 25, Subtitle 4, Chapter 7. In Prince George's County, general waste is regulated under Prince George's County Code Section 21 and in Montgomery County it is regulated under Montgomery County Code of Regulations Section 48. At each site, waste would be handled in accordance with these regulations. Two waste streams would be generated: solid waste and liquid waste. Solid waste would consist of non-hazardous, paper or food based waste that is not recycled or composted. Solid waste would be placed into designated waste receptacles in office and common use areas. On a regular basis the waste receptacles would be emptied and the waste would be collected in dumpsters. From the dumpsters the waste would be collected on a weekly basis by a contracted waste service. The waste service would be responsible for removing waste from the site and disposing of it at a licensed disposal facility.

Liquid waste would be generated in kitchens and bathrooms, and would be disposed of into the sewer system through the plumbing network of the facility. The sewer system would be operated

by WSSC, it would be WSSC responsibility to treat and dispose of the waste stream once the waste water left the HHS consolidation site.

The Maryland Recycling Law, (COMAR, Title 9, Subtitle 17) mandates that counties establish recycling plans. In Montgomery County the Division of Solid Waste Services introduced the Smart Organizations Reduce and Recycle Tons (SORRT) program (Montgomery County; 2010). Prince George's County has a single stream recycling plan, which removes the need for businesses to sort recyclable material prior to shipping.

The developer/owner would be required to divert recyclable material from the municipal solid waste to the maximum extent practical and in accordance with EO 13423, SFO 08-0114, and Prince George's or Montgomery County Code. Furthermore, to meet the objectives of EO 13423, EISA, and SFO 08-011, the developer/owner would reduce construction waste by recycling and reusing materials whenever possible. All recycled material would be shipped from the selected HHS Lease Consolidation site to end users by a contractor. All non-recyclable waste generated during construction would be disposed of at licensed facilities and would be the responsibility of the developer/owner. The developer/owner would also be responsible for the proper management and disposal of any hazardous waste generated during construction.

### **3.17.2 How Would the Proposed Project Affect Waste Management?**

#### *No-Action Alternative*

Under the No-Action Alternative, none of the alternative sites would be developed or renovated for the proposed HHS Lease Consolidation. HHS would continue to operate at the Parklawn Building and buildings in Suburban Maryland. Therefore, the No-Action Alternative would have no additional impact to waste management.

#### *Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building, and University Town Center (Action Alternative)*

Under any of the Action Alternatives, during construction or renovation and/or demolition, waste would be generated. The impact to the solid waste stream would be negligible, short-term, and adverse.

Under any of the Action Alternatives, general waste would be generated by HHS employees collocated at a central location. Overall, the amount of waste generated by the HHS would have a minor, long-term, adverse impact on the overall waste stream in the region. However, regardless of

which of the Action Alternative site is selected, the new facility would operate in a sustainable and waste efficient manner in compliance with EO 13423 and EISA, which would reduce the impact to waste management.

### 3.17.3 What Measures Would be Implemented to Reduce Waste Generated at Each of the Proposed Sites?

*Irvington Centre at King Farm, New Carrollton Metro, One Largo Metro, Parklawn Building, and University Town Center (Action Alternative)*

To meet the objectives of EO 13423, EISA and SFO 08-011, the developer/owner would reduce construction waste by recycling and reusing materials whenever possible in accordance with Prince George's County Code Section 21 or Montgomery County Code of Regulations Section 48. The developer/owner would be required to divert recyclable material from the municipal solid waste to the maximum extent practical and in accordance with EO 13423 and Prince George's or Montgomery County Code by establishing a recycling program for (at a minimum) paper, corrugated cardboard, glass, plastics, metals, mercury containing lamps, toner and inject cartridges, and pallets. Recyclable and non-recyclable waste generated during construction would be disposed of at licensed facilities and would be the responsibility of the developer/owner. Furthermore, the developer/owner would be responsible for the proper management and disposal of any hazardous waste generated during construction.

No matter which offered site is selected, the developer/owner would operate the HHS Lease Consolidation facility in a sustainable and waste efficient manner in accordance with the conservation requirements of SFO 08-011 and in compliance with EO 13423 and EISA.

## 3.18 Cumulative Effects

### 3.18.1 What are Cumulative Effects and Why Are They Discussed?

CEQ regulations require federal agencies to assess the cumulative effects of federal projects during the decision making process. Cumulative effects are defined as:

“the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions”  
(40 CFR 1508.7).

#### Cumulative Effects: An Example

There is evidence that the majority of environmental effects may result not from the direct effects of a single action, but from the combination of individually minor effects of multiple actions over time. A hypothetical example of the type of cumulative effects that could result from GSA projects is as follows:

A change in the character of a neighborhood resulting from federal office construction when added to local development.

In other words, a residential neighborhood may become increasingly more commercial as federal office and other local developments (office or mixed use retail) are constructed.

In other words, would the proposed federal project add to or interact with the environmental impacts of past, present, or future projects, regardless of the agency or group implementing those actions? This section of the EA provides a description of the cumulative impacts that the proposed action, combined with other projects in the area, may have on the human environment. To help the reader gain a better understanding of cumulative effects, the text box provides further explanation.

### 3.18.2 What Past, Present, and Future Projects Could Add to or Interact With the Impacts of the Proposed Project?

#### Past and Present Actions

Each of the alternative sites for the HHS Lease Consolidation are located in the suburbs of Washington, D.C. Following settlement of the region by English settlers, the areas in which the alternative sites are located were farmed for over 300 years. Development of the land spread out from Washington, D.C. with the earliest suburbs being located near the railroad and streetcars that provided access to the city. This development accelerated following World War II and during the 1950s and 1960s with the expansion of the Federal government. This development continued to expand with the construction of the Washington, D.C. beltway (I-495) and I-95 which runs between Washington and Baltimore, Maryland.

#### *Irvington Centre at King Farm*

The area surrounding the King Farm site developed as a mix of farmland, residential areas, and small commercial areas during the 1960s and 1970s. Farming continued in the area until the 1990s. Vacant lots such as the King Farm site are now surrounded by mixed development consisting of residential, commercial, and office spaces. The 435-acre former King Farm has been developed over the last 15 years into a mixed-use community consisting of 3,600 dwelling units, 3.2 million square feet of office space and 125,000 square feet of retail space. Development of this community continues at the present time.

#### *New Carrollton Metro*

The area surrounding the New Carrollton Metro site began transitioning from farmland to residential at the turn of the 20th century. In the vicinity of the New Carrollton Metro site, the West Lanham Hills neighborhood was developed between 1900 and 1940s with infill development continuing until the 1960s. With the construction of the Metrorail Orange Line and the New Carrollton Station in the 1970s, development accelerated in the vicinity. The Hanson Oaks

neighborhood was built in the 1970s, and commercial and office development has been constructed adjacent to the Metrorail Station. Current development consists primarily of infill development.

#### *One Largo Metro*

The area surrounding the One Largo Metro site developed as a mix of farmland, residential areas, and small commercial areas during the 1960s and 1970s. Farming continued in the area until the 1980s. Vacant lots such as the One Largo Metro site are now surrounded by mixed development consisting of residential, commercial, and office spaces. With the construction of the Largo Town Center Metro Station on the Metrorail Blue Line in the early 2000s along with the construction of FedEx Field, new residential, commercial, and office development has occurred adjacent to the Metro Station, I-495, Lottsford Road, and Arena Drive. Current development includes infill development surrounding the Metro Station.

#### *Parklawn Building*

Development along Rockville Pike (MD 355) occurred during the 1950s, 1960s, and 1970s. Residential areas in the vicinity of the Parklawn site and supporting commercial centers were constructed in the 1950s and 1960s with expansions occurring throughout the 1970s, 1980s, and 1990s. Expansion of the Federal government through the 1970s necessitated the expansion of offices outside of Washington resulting in development of offices in locations such as North Rockville including the Parklawn site. Current development consists of renovations to existing commercial and retail spaces.

#### *University Town Center*

The area surrounding the University Town Center site began transitioning from farmland to residential at the turn of the 20th century. In the vicinity of the University Town Center site, residential development began in Hyattsville in the 1920s. The neighborhoods of University Park and College Heights Estates were constructed in the 1940s. Prince George's Plaza, now called the Mall at Prince George's, opened in 1958. With the construction of the Metrorail Prince George's Plaza Station in the early 1990s, redevelopment of office and commercial space began in the area with renovations to the Mall at Prince George's and construction of the University Town Center. Current development includes infill development surrounding the Metro Station.

### Future Actions

Information on approved future developments was obtained from City of Rockville, Montgomery County and Prince George's County. Tables 19 through 23 provide a list of planned developments in the vicinity of each alternative site.

**Table 19: Irvington Centre at King Farm Approved Background Developments**

Land Use	Size	Unit
Upper Rock Development		
Garden Mid-Rise Apartments	750	Dwelling
Shady Grove Parcels 6 & 7		
Office	329,300	Square Foot
Single-Family Attached	144	Dwelling
Multi-Family Apartment/Condo	196	Dwelling

**Table 20: New Carrollton Metro Approved Background Developments**

Land Use	Size	Unit
New Carrollton Town Center		
Office	37,246	Square Foot
Residential Condominium	106	Dwelling

**Table 21: One Largo Metro Approved Background Developments**

Land Use	Size	Unit
Inglewood Business Community		
General Office, Lot 27	60,984	Square Foot
Inglewood Business Community		
General Office, Lot 43	60,984	Square Foot
Largo Metro Center		
Major Activity Center	160,000	Square Foot
Capital Commerce Park		
Mixed Use – Office/Restaurant/Retail/Hotel	134,504/159	Square Foot/Rooms
Largo Park, Lots 1 & 2		
Dwelling	318	Dwelling
Mixed-Use - Office/Retail/Rest	98,621	Square Foot
Capital Commerce Park		
Restaurant	1,500	Square Foot
Inglewood Business Community, Lot 39		
General Office	25,368	Square Foot
Hotel	143,216	Square Foot
Largo Center West		
General Office	201,672	Square Foot
Largo Park, Lot 5B		
General Office	144,000	Square Foot

**Table 22: Parklawn Building Approved Background Developments**

Land Use	Size	Unit
Spring Lake Park		
General Office	93,000	Square Foot
Research & Development Cent	98,790	Square Foot
Thompson's Property		
General Office	150,000	Square Foot
Twinbrook Commons East		
Retail	70,000	Square Foot
Garden Mid-Rise Apartments	144	Dwelling
High-Rise Apartments	690	Dwelling
Suburban Propane		
High-Rise Apartments	110	Dwelling
Boland Campus Development		
General Office	69,500	Square Foot
Twinbrook Commons West		
Retail	80,000	Square Foot
General Office	325,000	Square Foot
High-Rise Apartments	481	Dwelling
North Bethesda Town Center		
High-Rise Apartments	1,350	Dwelling
General Office	1,148,000	Square Foot
Retail	202,037	Square Foot
Movie Theater, Matinee	3,500	Seats
MO County Conference Center		

Land Use	Size	Unit
Hotel Rooms	225	Rooms
White Flint Crossing		
Retail	173,000	Square Foot
High Turnover Restaurants	30,000	Square Foot
Garden Mid-Rise Apartments	172	Dwelling
High Rise Apartments	268	Dwelling
Tower Oaks - West of Lakes		
Garden Mid-Rise Apartments	172	Dwelling
6000 Montrose Parkway		
General Office	308,400	Square Foot

**Table 23: University Town Center Approved Background Developments**

Land Use	Size	Unit
University Town Center		
Safeway	57,000	Square Foot
Belcrest Center, Phase III		
Mixed-Use, Retail & Office	328,574	Square Foot
Belcrest Center, Phase IV		
Hotel	93,000	Square Foot
Prince George's Plaza		
Restaurant	6,574	Square Foot
Belcrest Plaza Mixed Use		
Multi-Family Dwellings	2,618	Dwelling

Land Use	Size	Unit
Townhouses	58	Dwelling
Retail	62,100	Square Foot
Office	176,000	Square Foot

### 3.18.3 What Are the Cumulative Effects?

Past, present and future development has affected and will continue to affect the natural, cultural, and social environment at each of the alternative sites and surrounding areas. Current and future development continues to result in a loss of vegetation, putting pressure on natural habitats and adversely affecting wildlife. In addition, development increases impervious surfaces, which in turn increase stormwater runoff. Additional development continues to put pressure on community services and increases demand for utilities, particularly electrical and water supplies. With an increase in development there also comes an increase in roadway congestion and the LOS on our roadways becomes problematic. Congestion and worsening LOSs contribute to poor air quality. The traffic analysis conducted for this EA took into account future development and thus represents cumulative impacts for traffic (See Section 3.15). Finally, future development projects may present views of a more densely developed environment and could affect historic and archeological resources.

Beneficial cumulative impacts associated with past, current, and future development include increased job opportunities, improved housing, and an increase in the regional and state tax base.

### 3.19 Are There Any Adverse Environmental Effects Which Cannot be Avoided Associated with the Proposed Project?

Environmental Impact for all action alternatives have been described in detail in the previous sections of this chapter. In general, there would be unavoidable adverse effects due to the type of lease consolidation project that is proposed. There would be a loss of land to building space under the King Farm, New Carrollton Metro, One Largo Metro and University Town Center sites for the HHS lease Consolidation, which will include some vegetative areas. While some space would remain

open, some areas would be paved, thereby not allowing vegetative growth. Under the Parklawn Building alternative, there would be no additional loss of vegetation. There would be permanent changes to the views surrounding the sites especially with the New Carrollton Metro site due to the shape of the site and the potential placement of building(s). There would also be an increase in traffic densities in the area surrounding each of the sites, due to commuting employees. This increase would be less for the Parklawn Building alternative, as the increase of employees to this site would be 200 in addition to the number of HHS employees currently at the Parklawn Building.

### **3.20 What Relationships Exist Between the Local Short-Term Uses of the Proposed Project and Maintenance and Enhancement of Long-Term Productivity?**

The long-term benefits of the HHS Lease Consolidation would occur at the expense of short-term impacts in the vicinity of the selected site. These short-term effects would occur during the period of construction or renovation, and would include localized noise and air pollution, as well as some traffic detours and delays. However, these impacts are temporary and proper controls would be utilized to prevent these impacts from having a lasting effect on the human environment.

Short-term gains to the local economy would occur as local companies and workers are hired and local businesses provide services and supplies during the construction or renovation of buildings. However, upon completion of the project, the gains to the local economy would evolve into a long-term benefit as HHS employees move into the facilities and provide consistent business to the surrounding merchants. These gains would be less under the Parklawn Building alternative as HHS currently resides in this building and under the proposed action only an additional 200 employees would be relocated to this building.

Furthermore, upon completion of the HHS Lease Consolidation, there would be a long-term increase in efficiency of HHS operations, as coordination among various components would occur because they would be in one centralized location.

### **3.21 Are There Any Irreversible and Irretrievable Commitments of Resources Associated with the Proposed Project?**

The HHS Lease Consolidation would require the commitment of land for construction under the King Farm, New Carrollton Metro, One Largo Metro, and University Town Center sites. The total commitment would include a loss of vegetation currently present at each of the sites. The loss of vegetation would be permanent.

A commitment of fuel, including natural gas and energy would be required to construct or renovate building(s) under any of the proposed alternative sites. Other resource commitments during the construction or renovation period would include construction materials and labor. Once the HHS Lease Consolidation is in place, there is a commitment of utilities, fuel, and power. All of these resources relating to the construction and maintenance of the HHS Lease Consolidation and its infrastructure are considered irretrievably committed.

While there will be the above commitment of resources, through conservation and sustainability practices some of these resources, such as water supply, may be retrieved. In addition, the HHS Lease Consolidation would require a lower expenditure of funds, energy, and fuel than presently committed under the existing Parklawn Building and the three other leased facilities in Suburban Maryland. The HHS Lease Consolidation would reduce some of these expenditures once the lease consolidation occurs. HHS employees would be collocated into one building and would not be spread amongst four separate buildings in Suburban Maryland.

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Maryland Department of Natural  
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Office Of The Secretary Executive Director  
Tawes State Office Building C4  
580 Taylor Avenue  
Annapolis, MD 21401-2397

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Wildlife and Heritage Services  
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100 Community Place  
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Deputy General Manager  
Washington Metropolitan Area Transit Authority  
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**MONGTOMGERY COUNTY GOVERNMENT**

The Honorable Ike Leggett  
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Glen Arden, MD 20706

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West Lanham Hills Civic Association  
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## Appendix A – EA Figures

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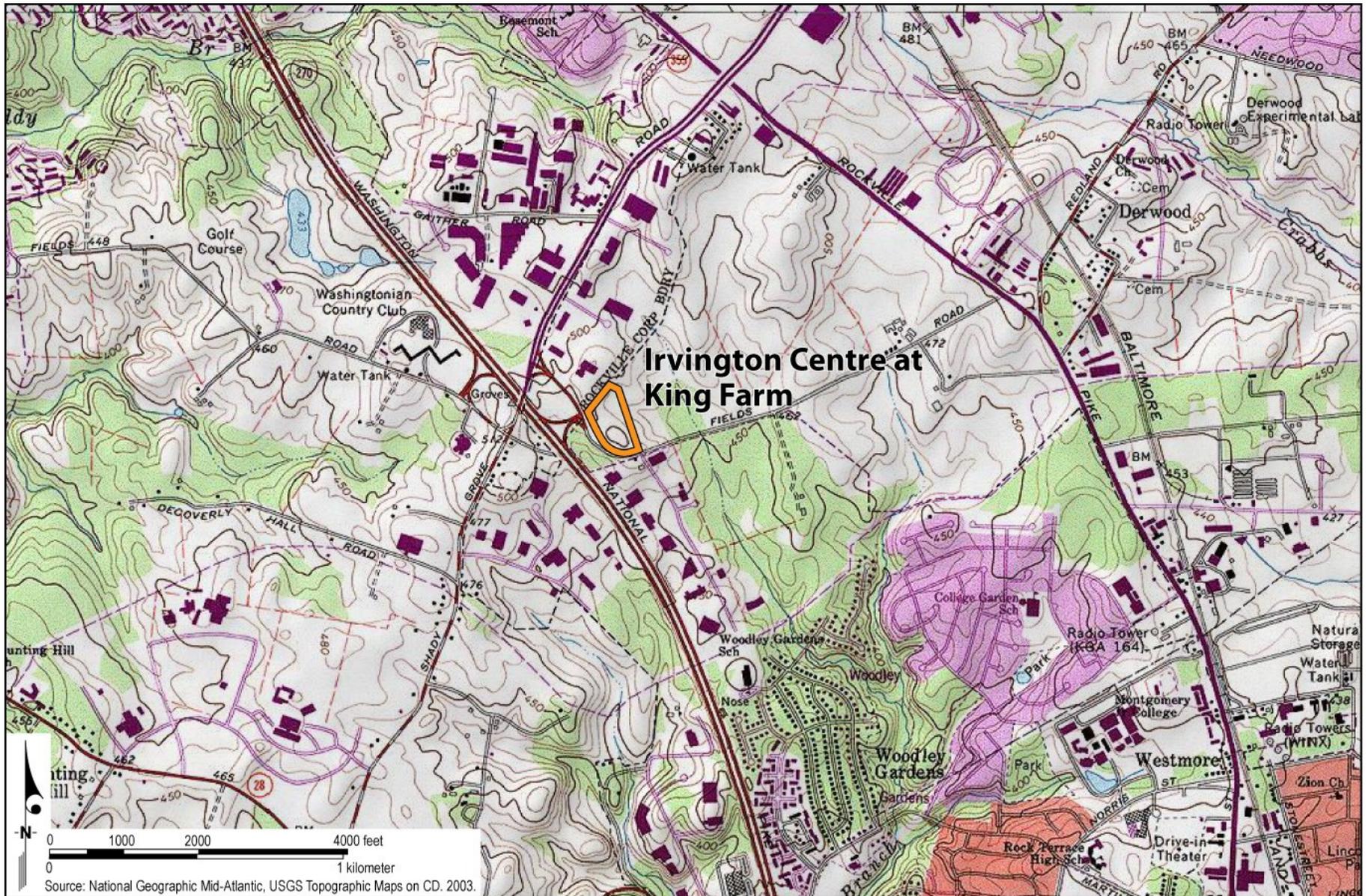


Figure A-1. USGS Quadrangle Irvington Centre at King Farm

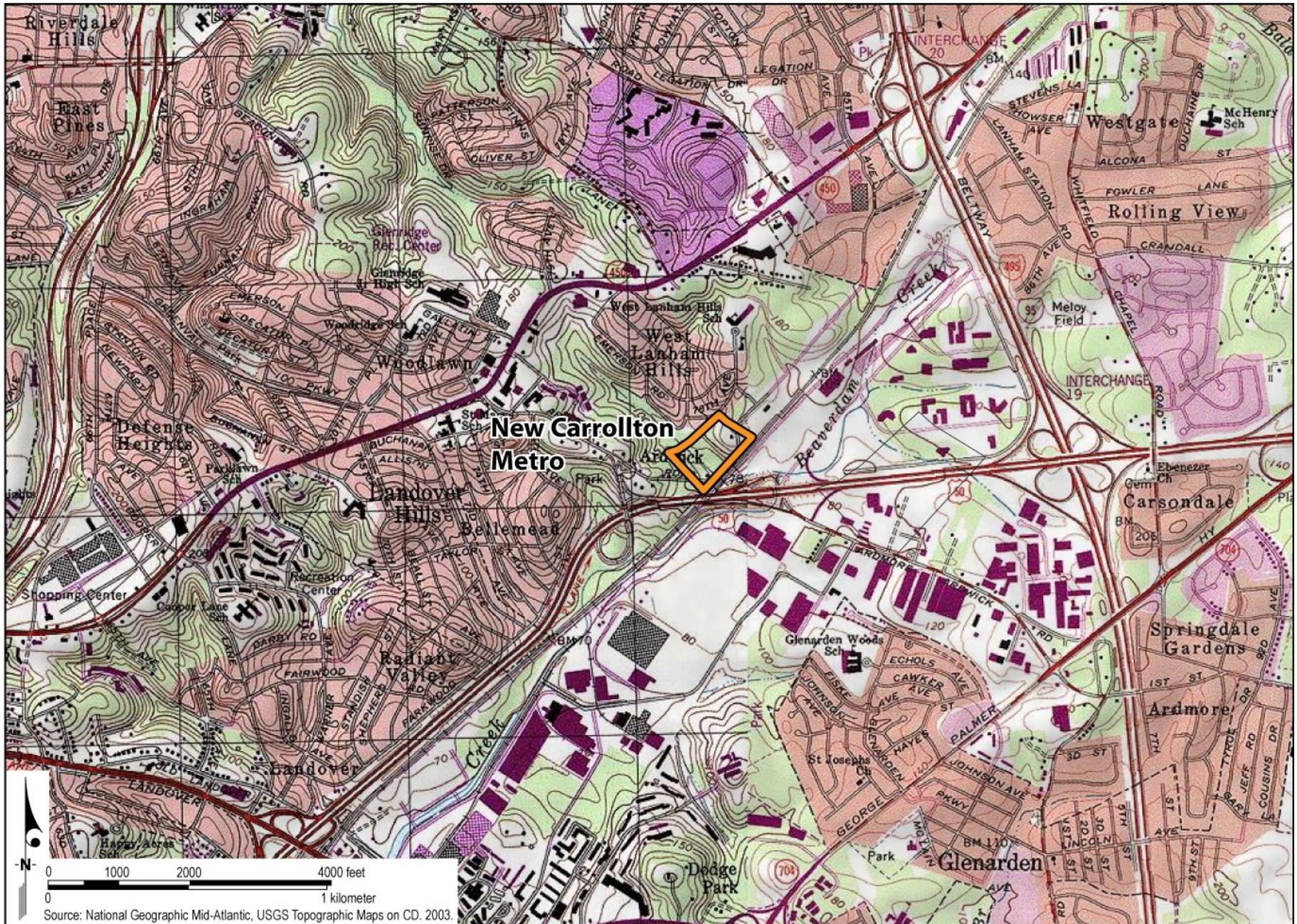


Figure A-2. USGS Quadrangle of New Carrollton Metro Site

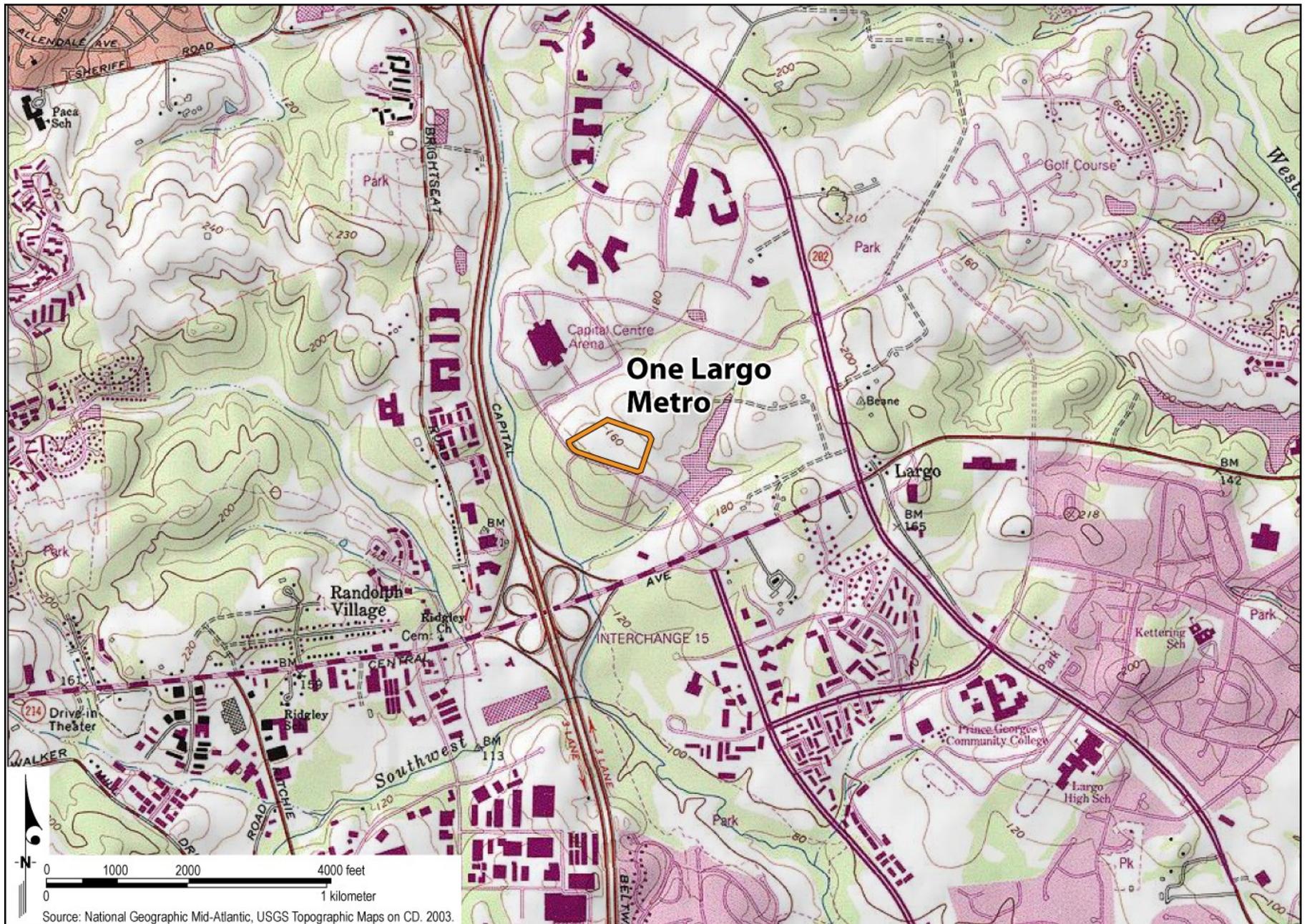


Figure A-3. USGS Quadrangle of One Largo Metro Site

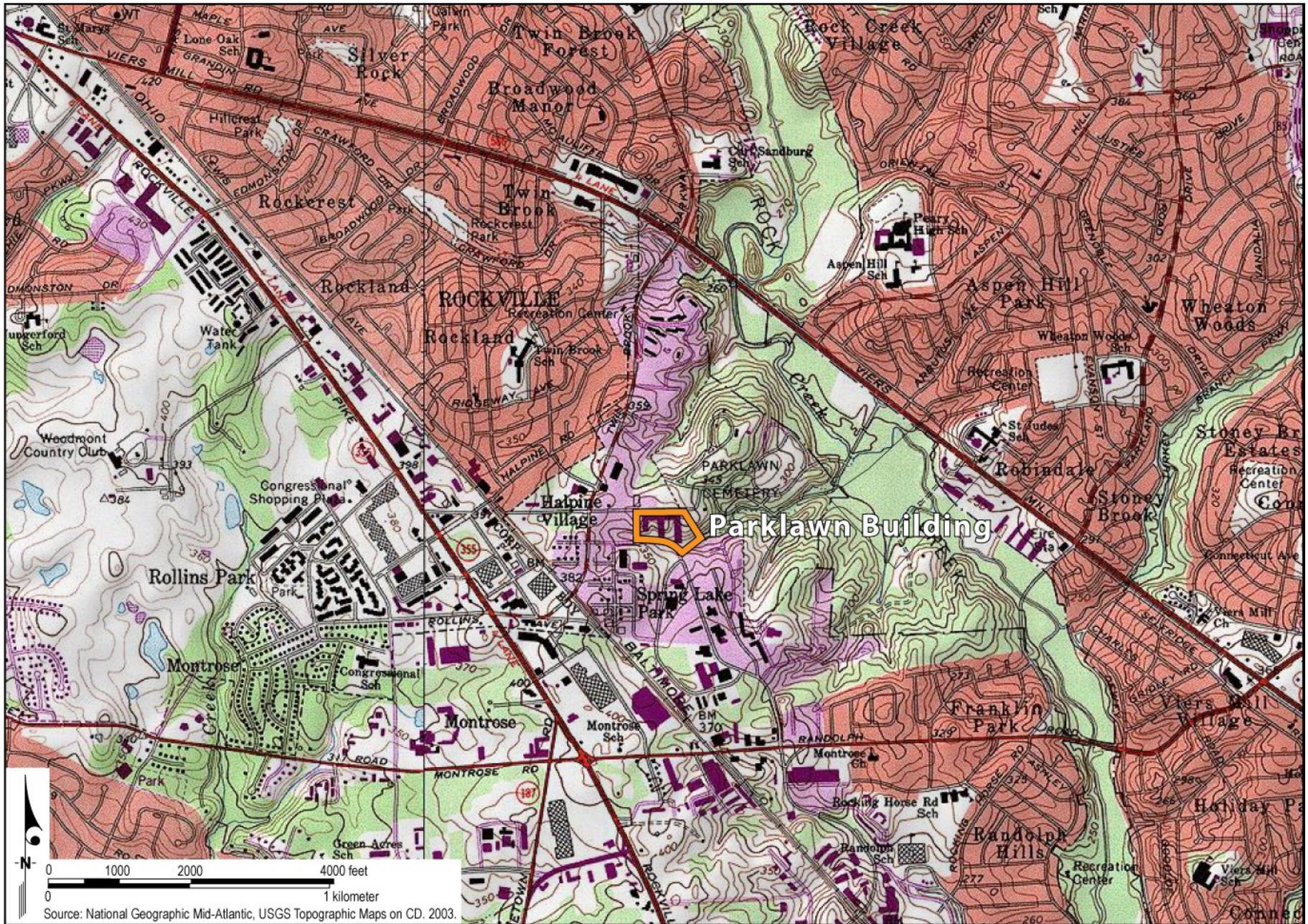


Figure A-4. USGS Quadrangle of Parklawn Building Site

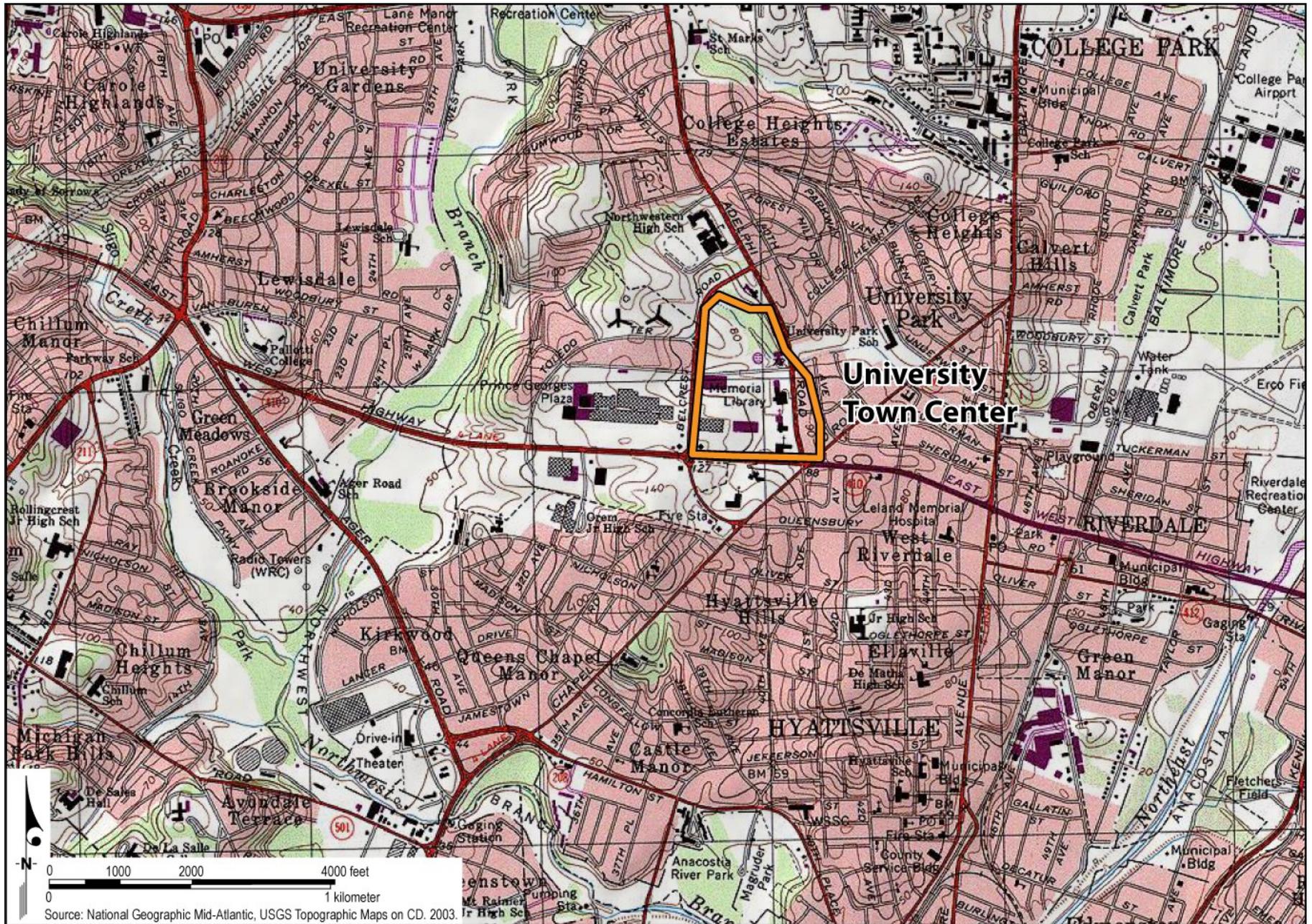


Figure A-5. USGS Quadrangle of University Town Center Site



Figure A-6. Soils Map Irvington Centre at King Farm Site



Figure A-7. Soils Map New Carrollton Metro Site



Figure A-8. Soils Map One Largo Metro Site



Figure A-9. Soils Map Parklawn Building Site



Figure A-10. Soils Map University Town Center Site

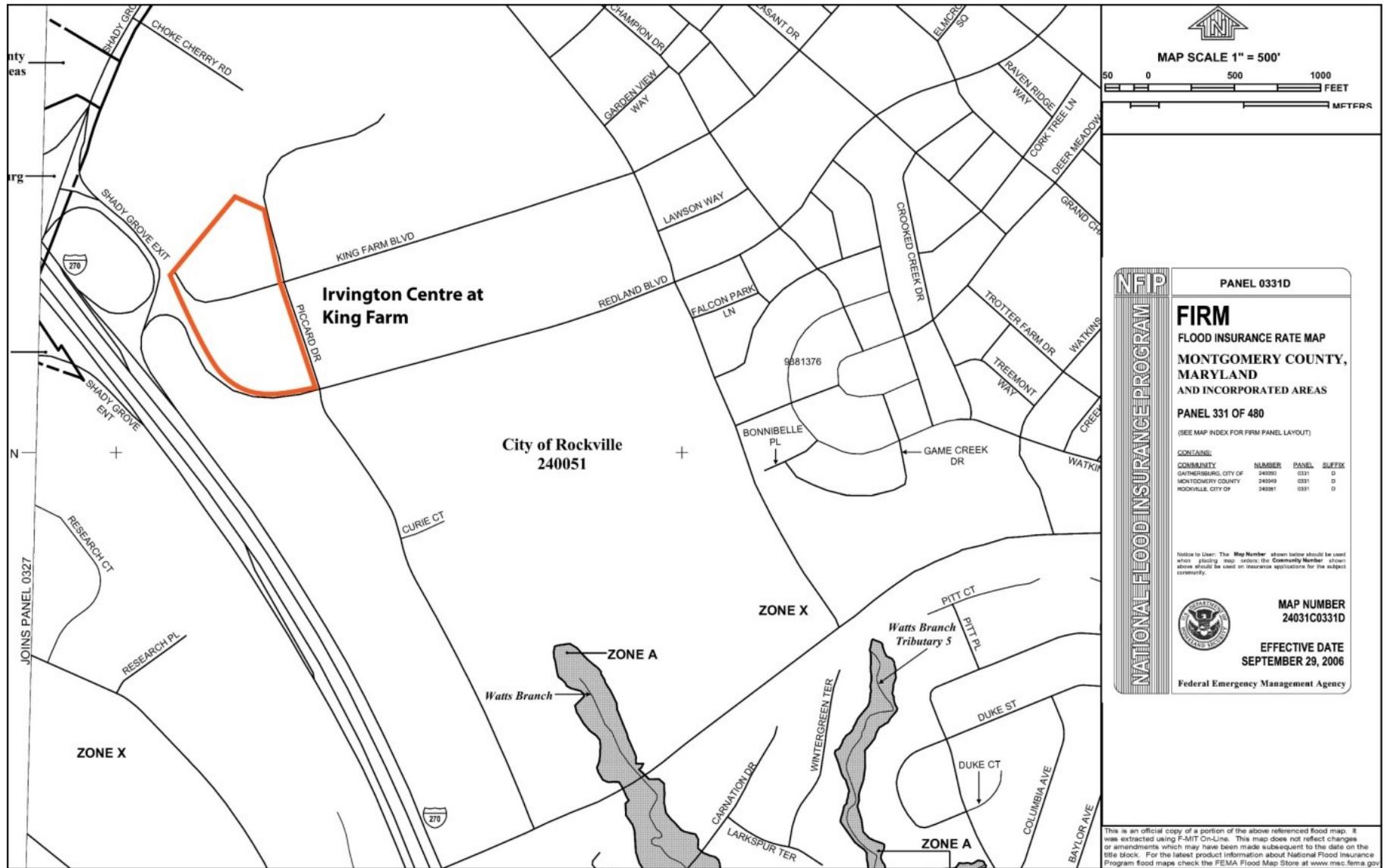


Figure A-11. Floodplain Map Irvington Centre at King Farm Site

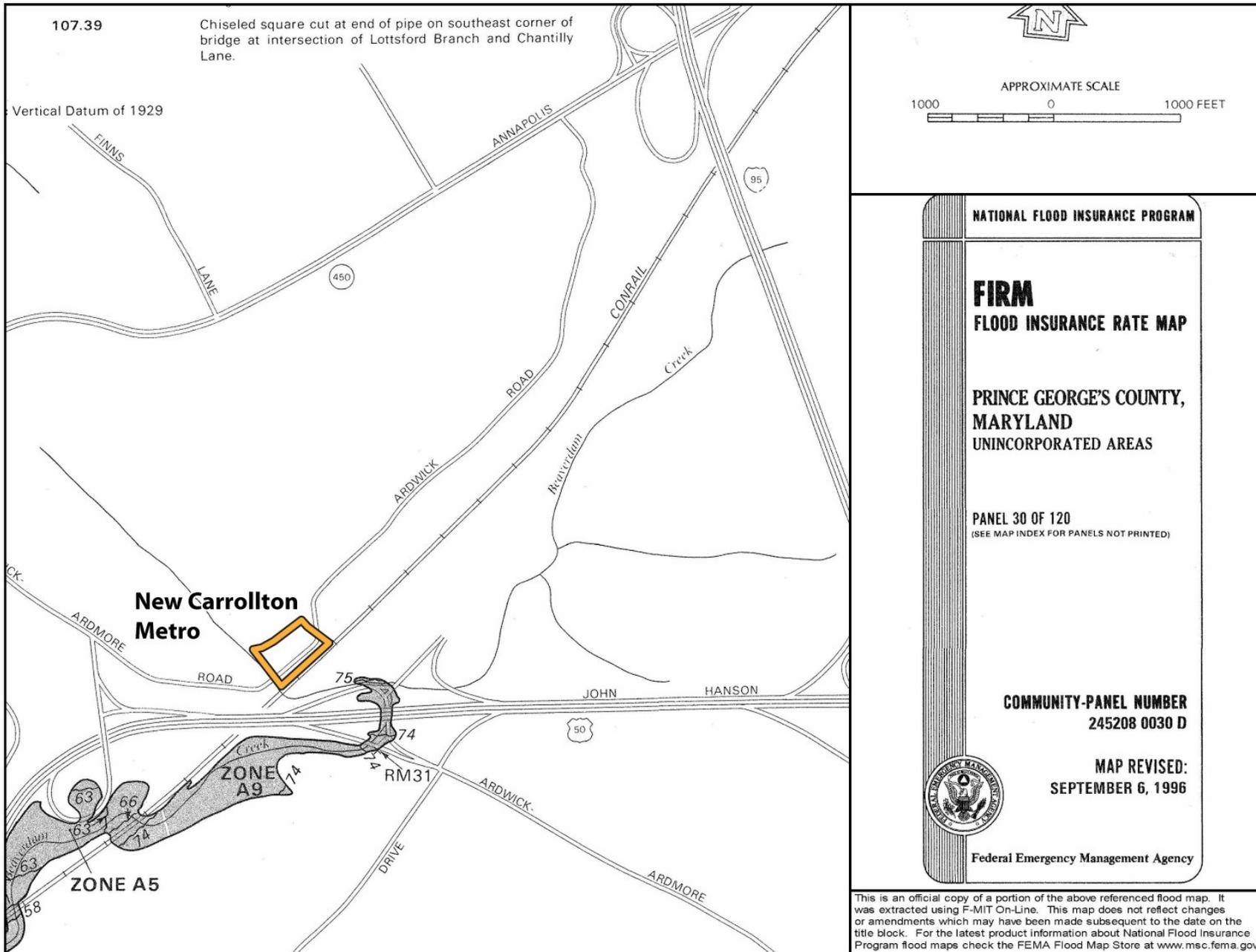


Figure A-12. Floodplain Map New Carrollton Metro Site

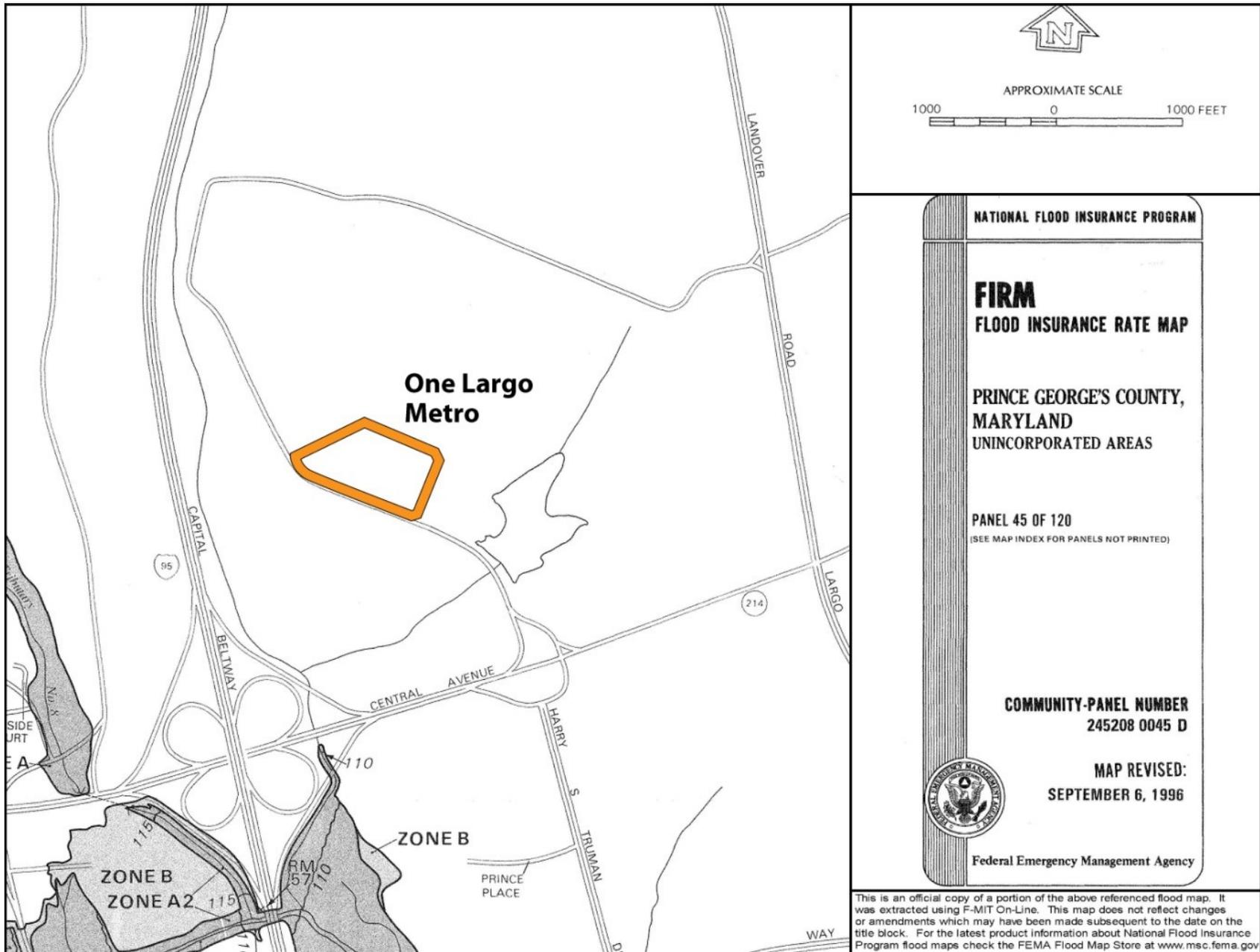


Figure A-13. Floodplain Map One Largo Metro Site

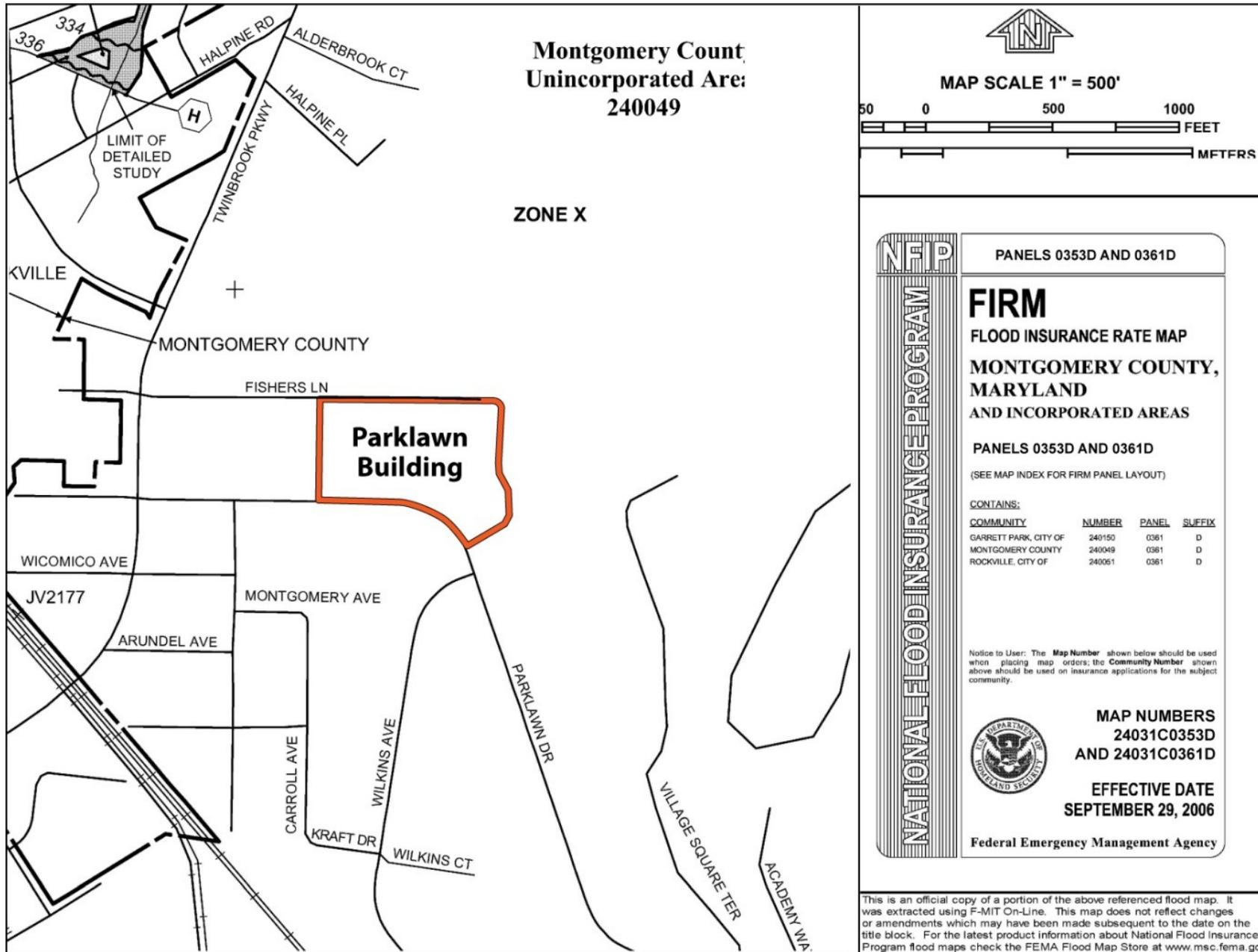


Figure A-14. Floodplain Map Parklawn Building Site

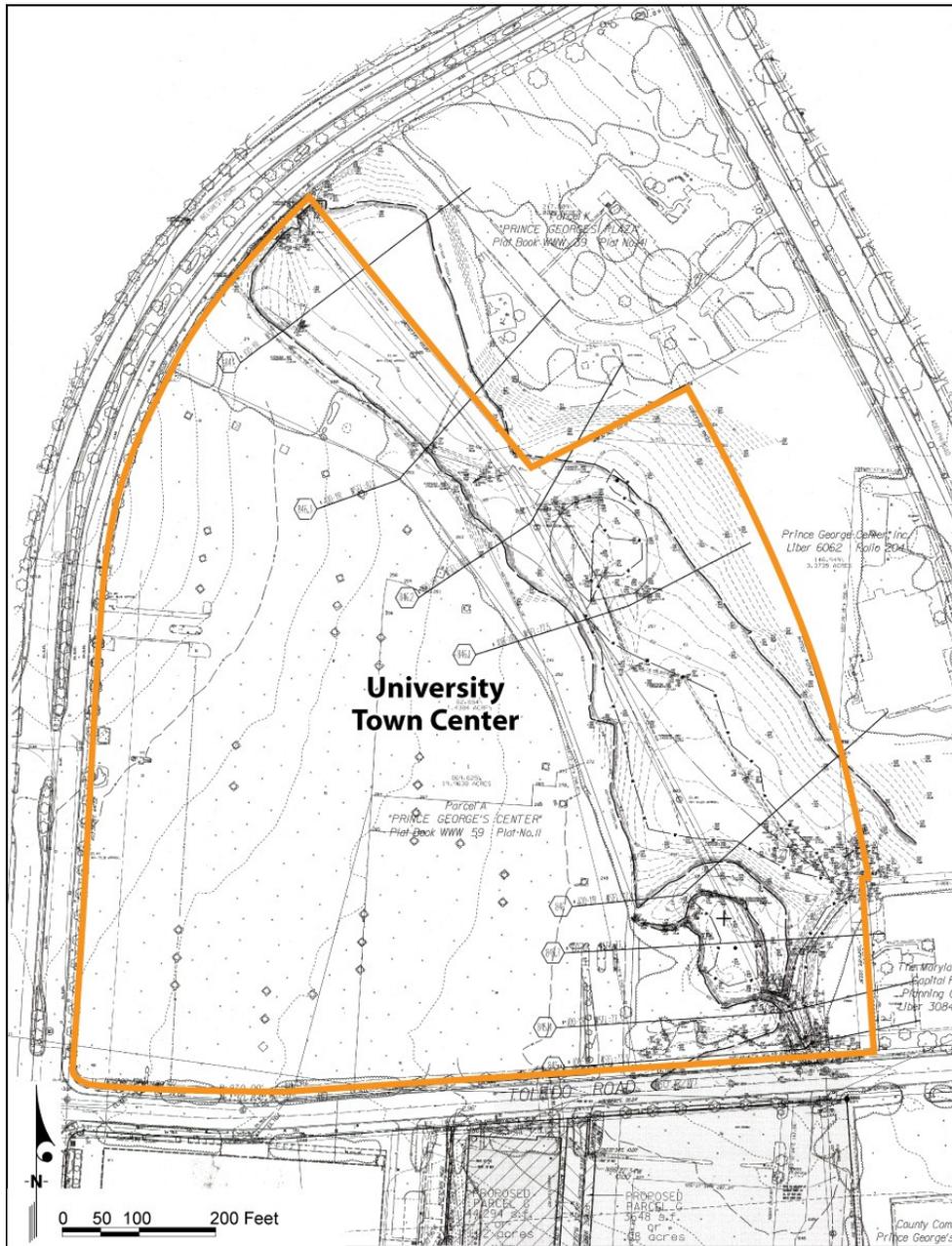


Figure A-15. Floodplain Map University Town Center Site

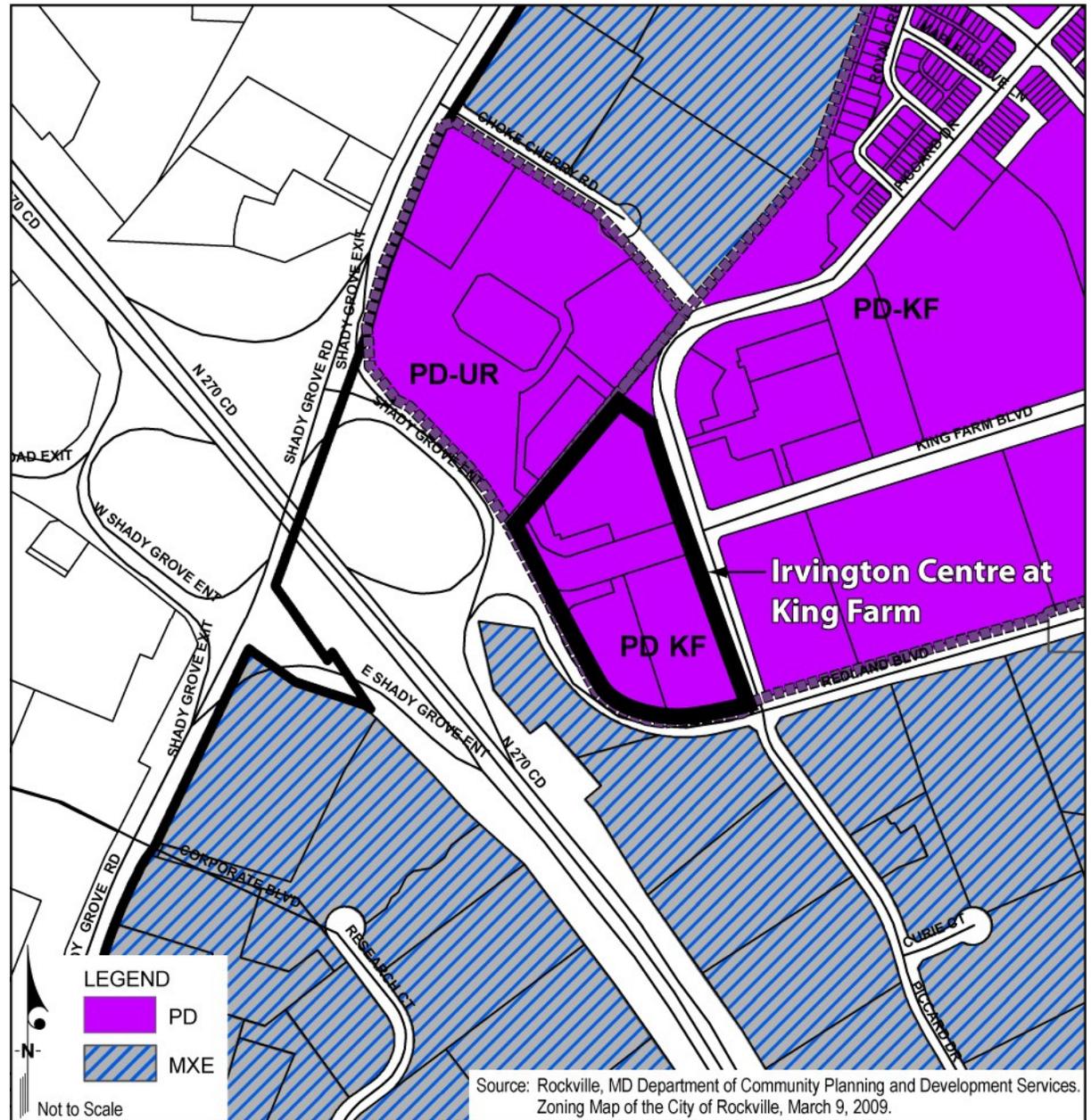


Figure A-16, Zoning Irvington Centre at King Farm Site

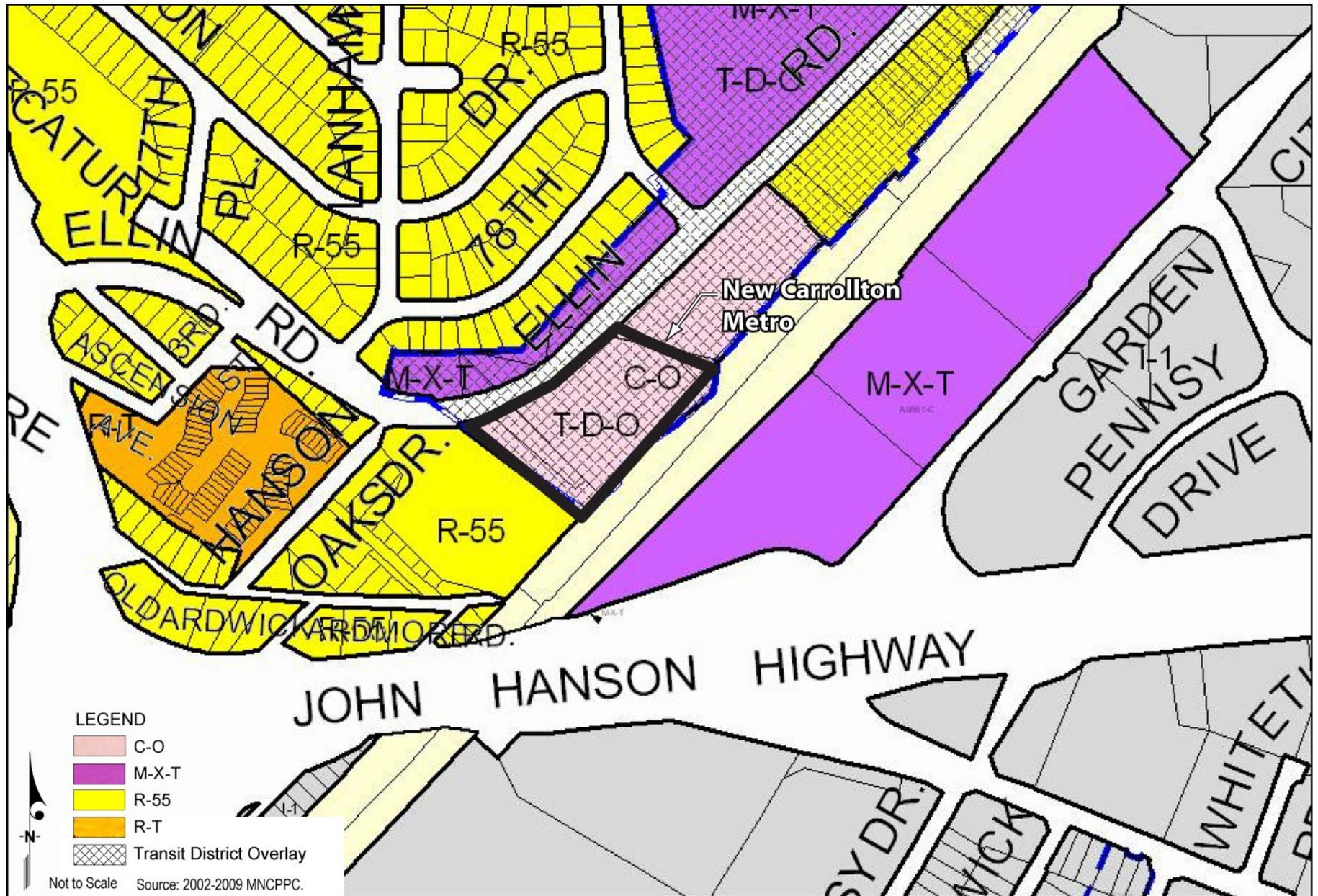


Figure A-17. Zoning New Carrollton Metro Site

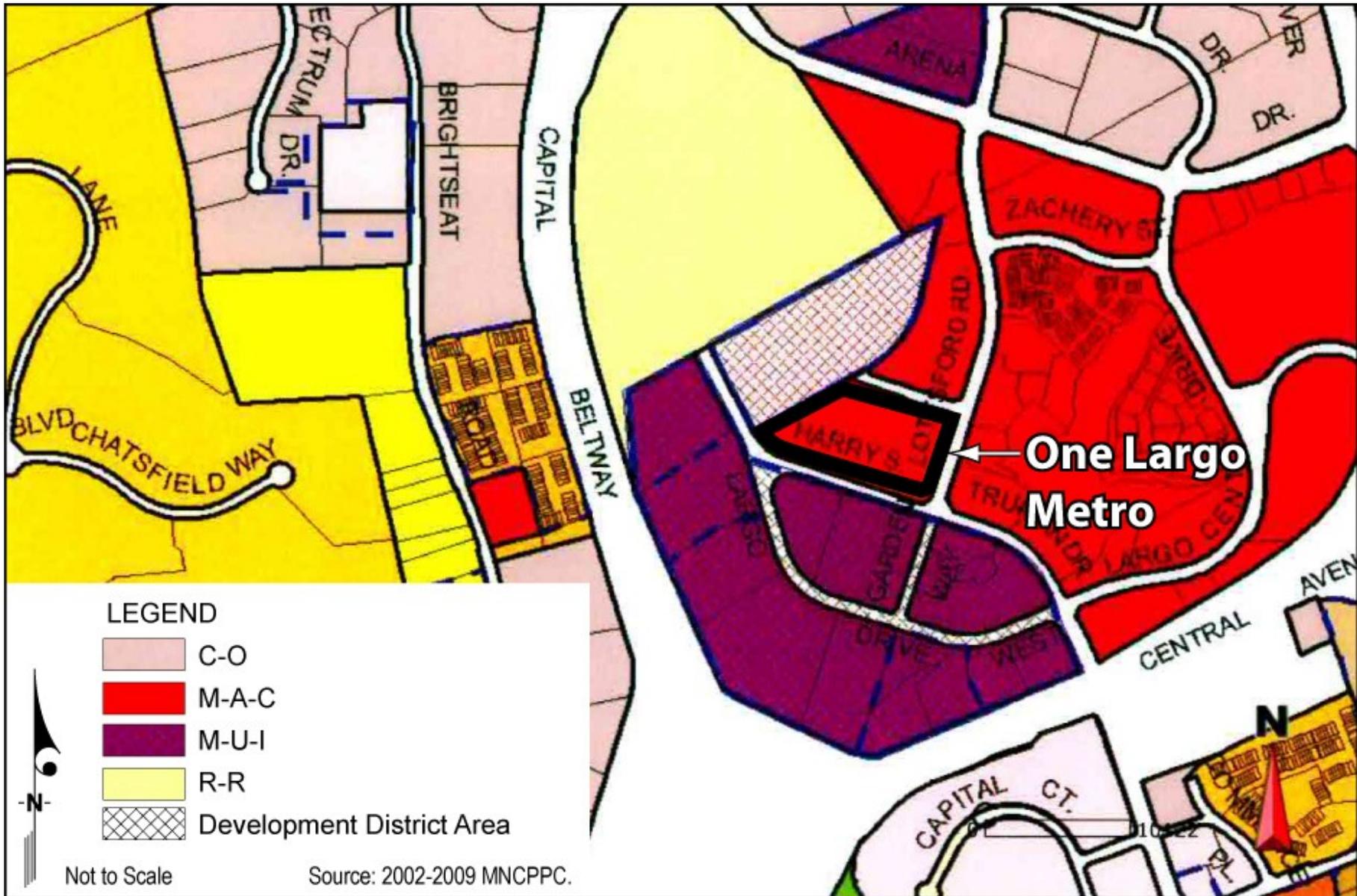


Figure A-18. Zoning One Largo Metro Site

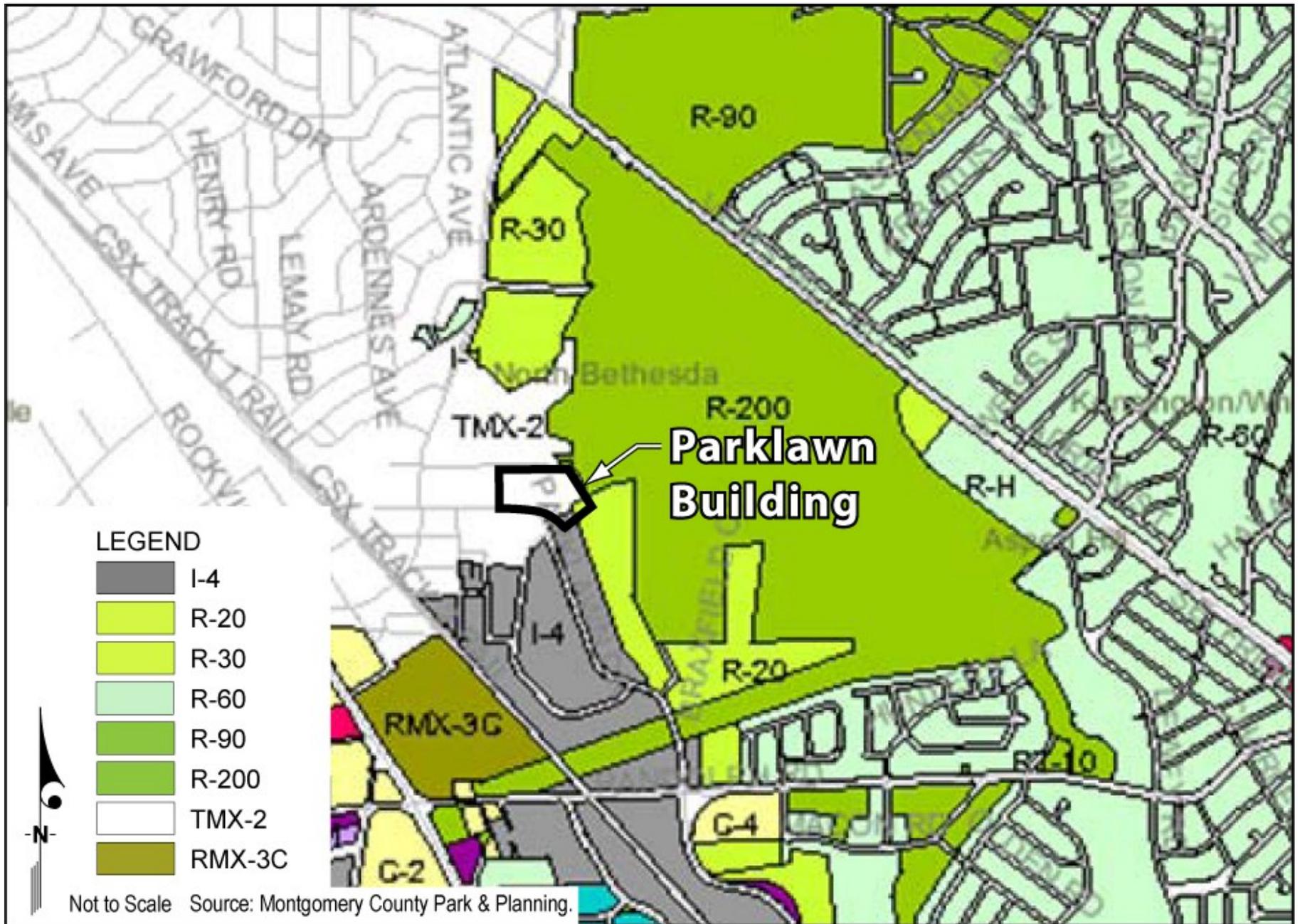


Figure A-19. Zoning Parklawn Building Site

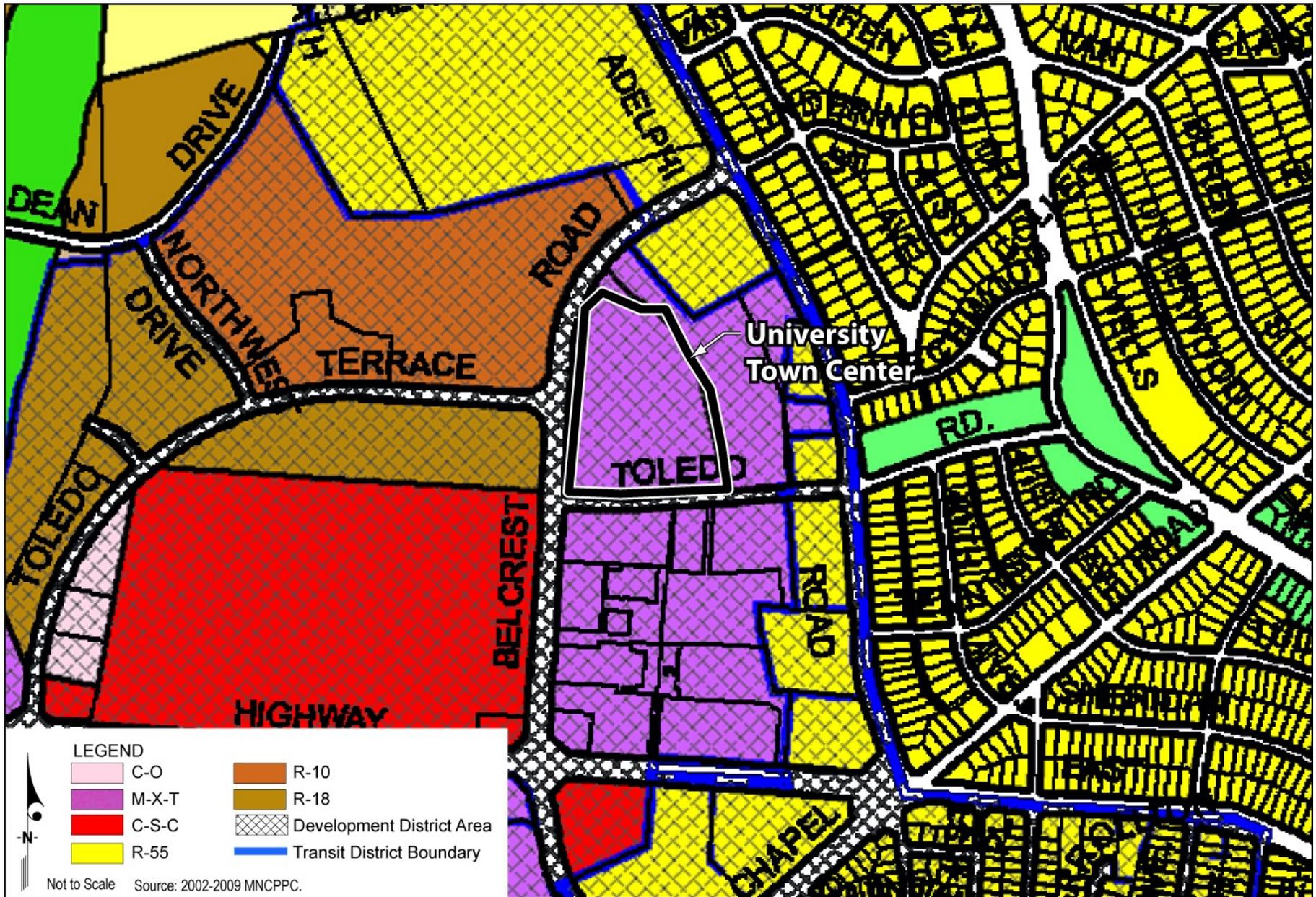


Figure A-20. Zoning University Town Center Site



Figure A-21. Metrorail System Map

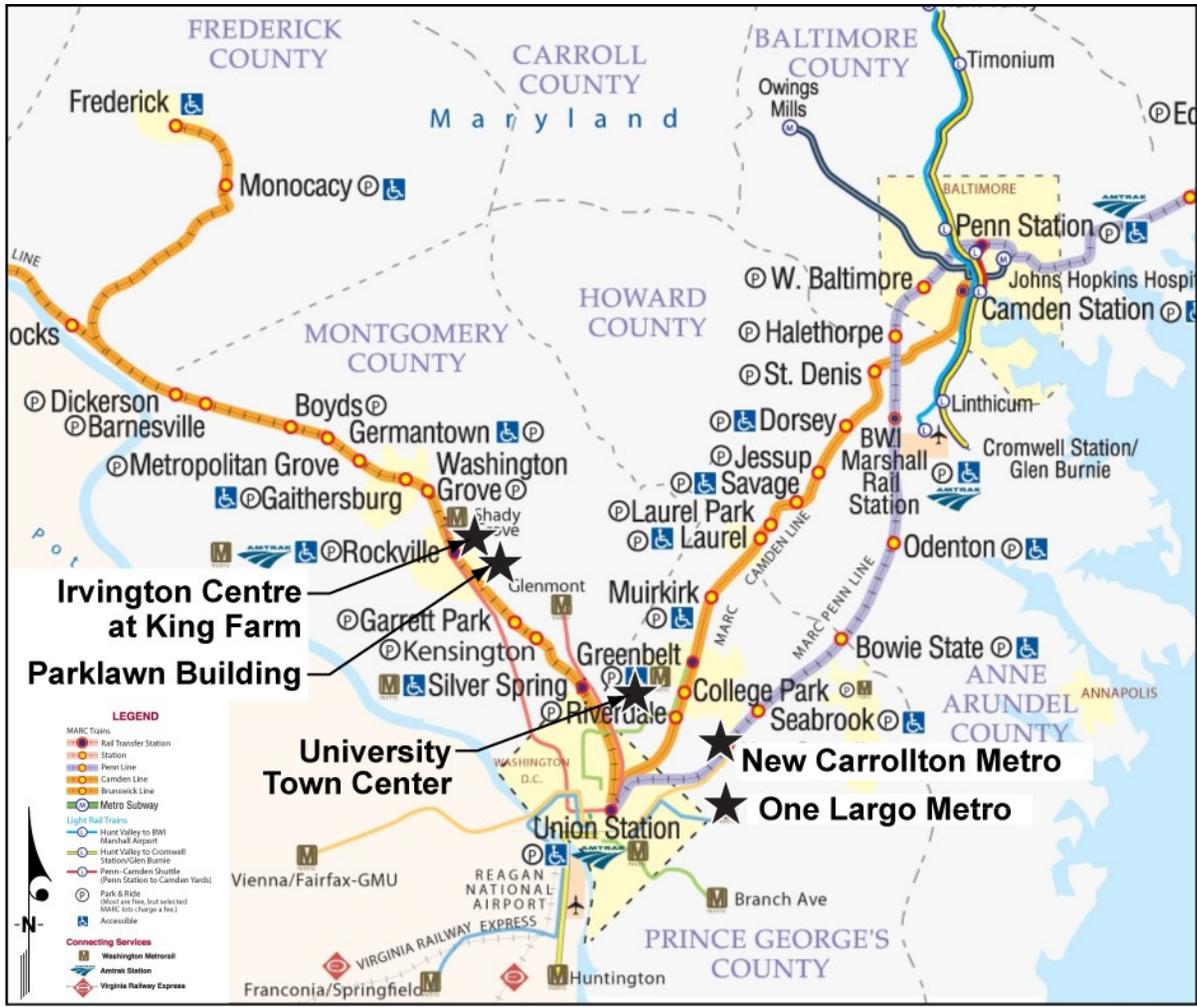


Figure A-22. MARC Rail System Map

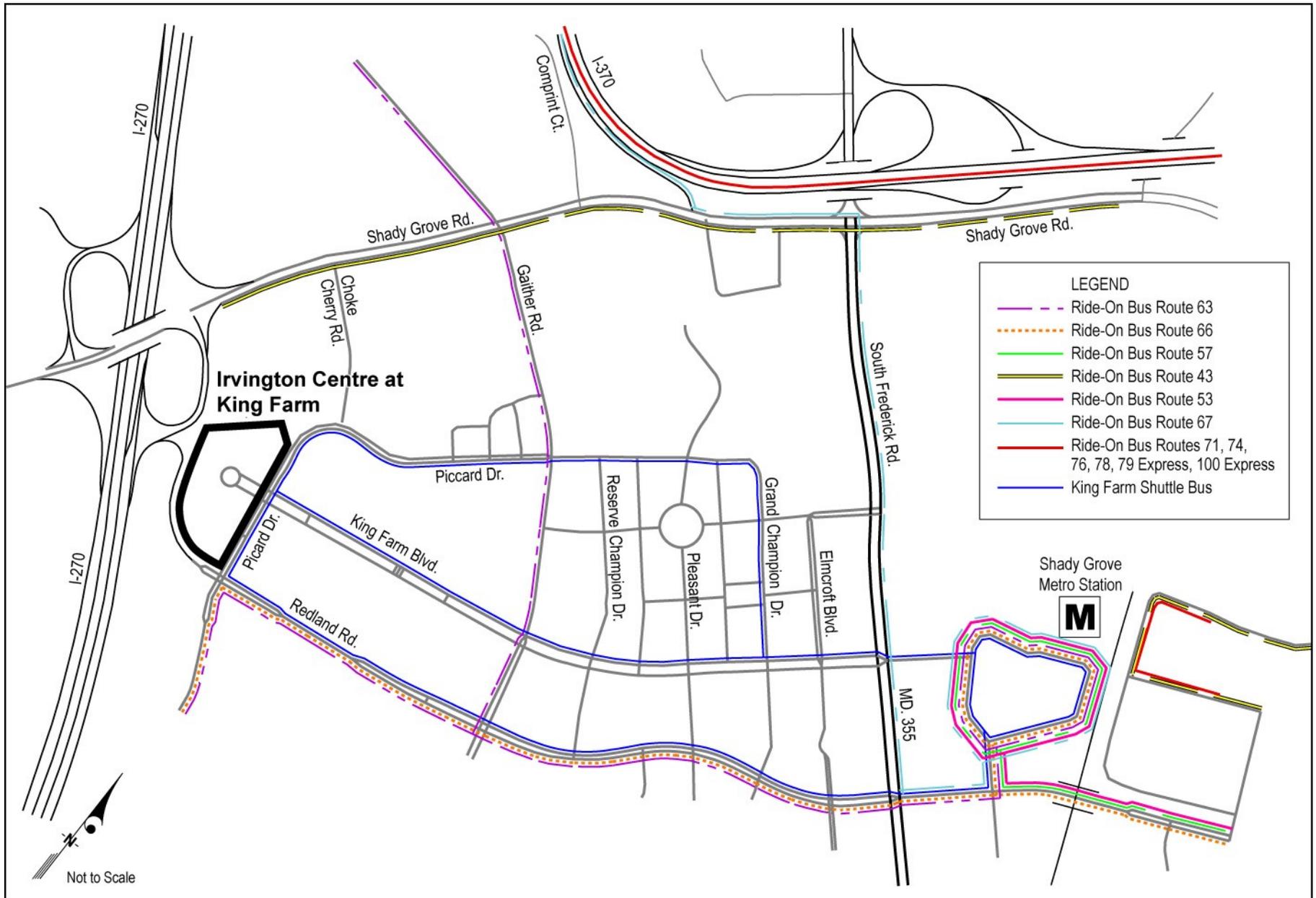


Figure A-23. Bus Routes Irvington Centre at King Farm Site

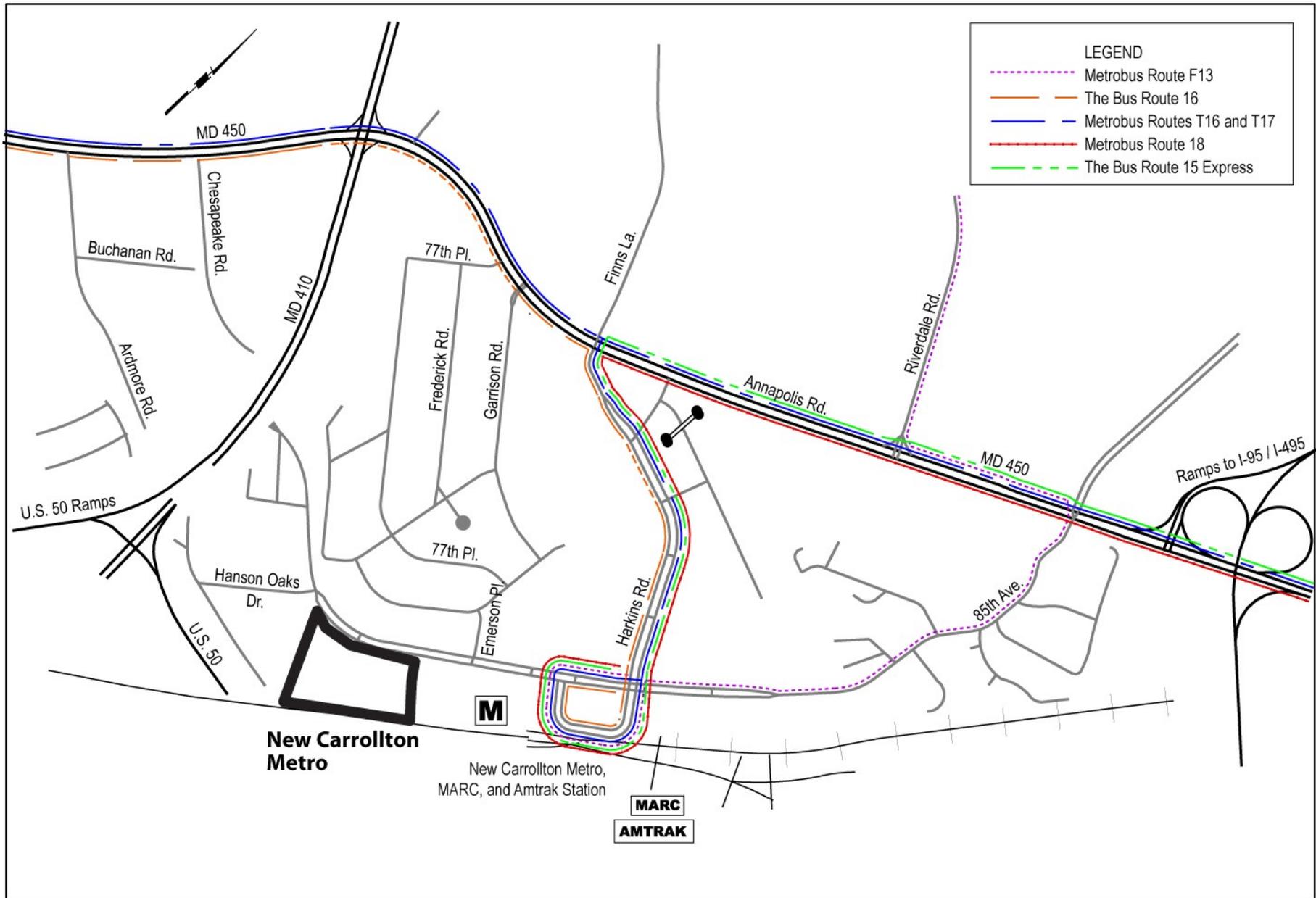


Figure A-24. Bus Routes New Carrollton Metro Site

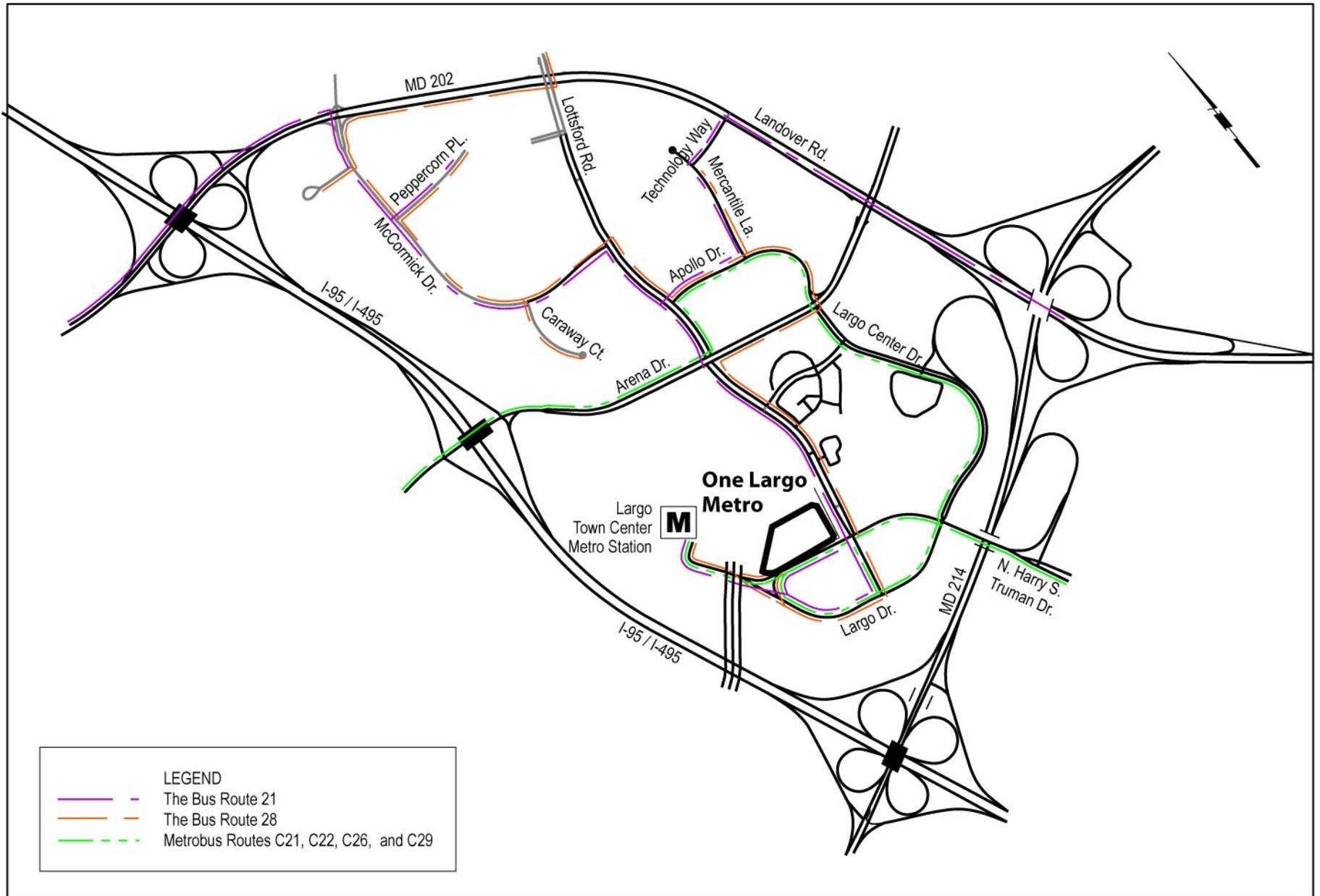


Figure A-25. Bus Routes One Largo Metro Site

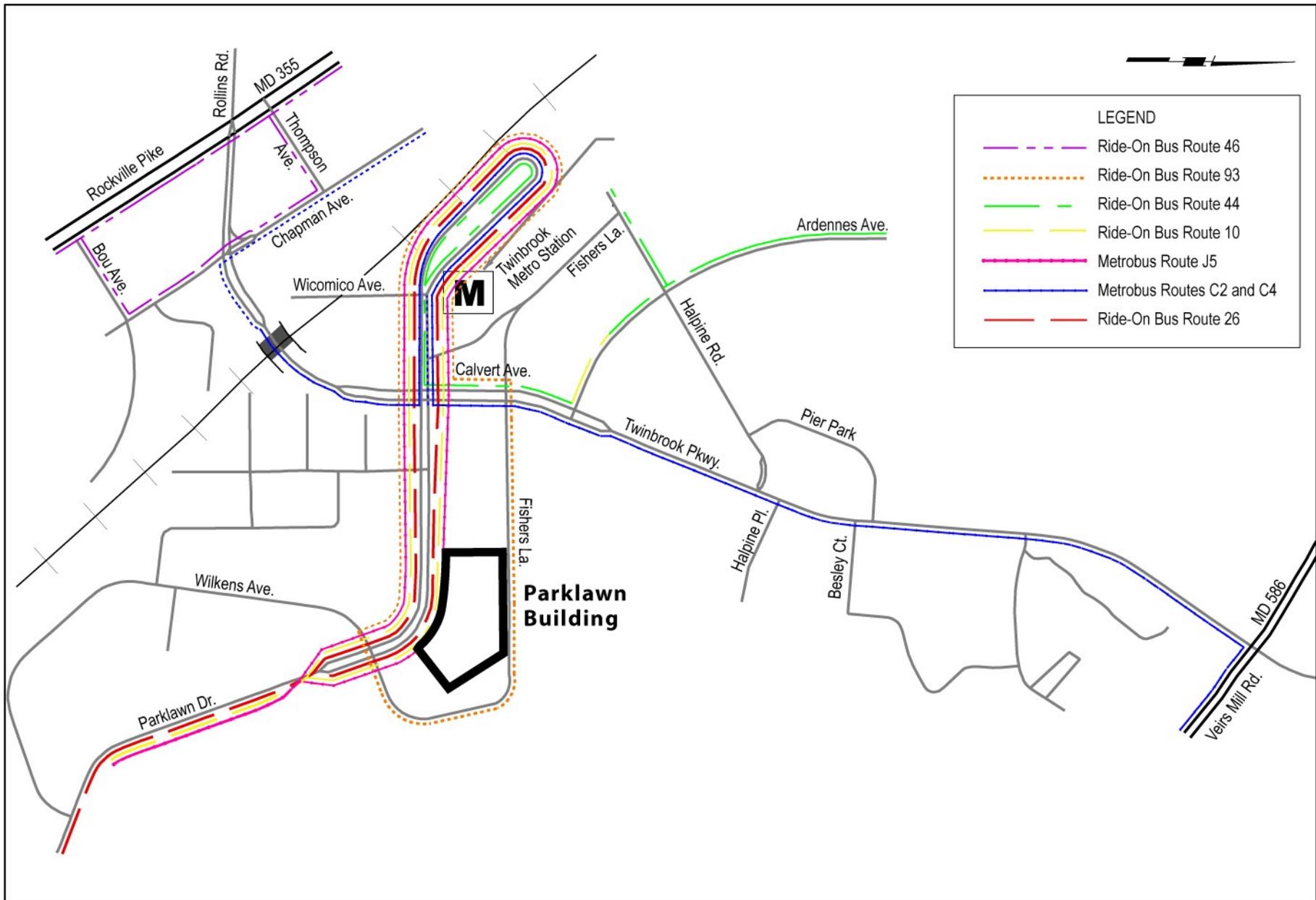


Figure A-26. Bus Routes Parklawn Building

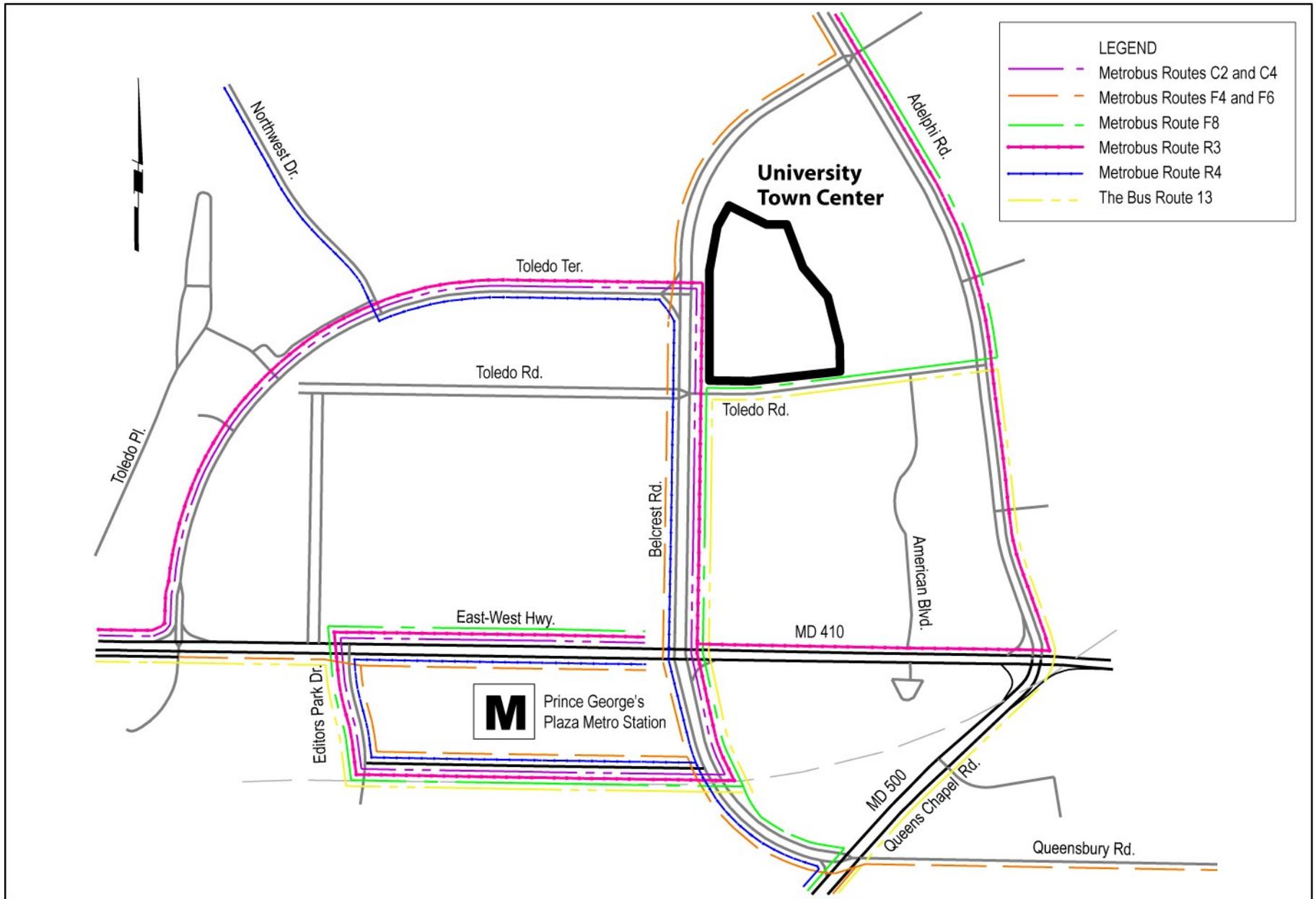


Figure A-27 Bus Routes University Town Center Site

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## Appendix B – Scoping Letters

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**Suzanne Hill/CONTRACTOR/WP/RW/G SA/GOV**

07/13/2010 12:30 PM

To: B Rosenbush

cc:

bcc:

Subject: RE: Request for information for the Lease Consolidation of U.S. Department of Health and Human Services in Suburban Maryland -response to request for map

Bob,

You had left me a message regarding a map showing all the sites. Please find attached a location map. Please note the following:

The U.S. General Services Administration (GSA) is preparing an Environmental Assessment (EA) to assess the potential impacts of the lease consolidation of the U.S. Department of Health and Human Services (HHS) in Suburban Maryland. GSA is proposing to acquire space through leasing in order to collocate four of HHS's current leased locations in suburban Maryland into one location to improve functional efficiency. The number of Federal employees to be collocated is approximately 2,900. GSA would enter into a lease agreement for up to 935,401 rentable square feet of space. The delineated area for the lease is Suburban Maryland, within Montgomery County and Prince George's County and within 3 miles driving distance of a Metrorail station. GSA has received multiple offers for sites that are potential locations for the lease consolidation. Potential locations that have been offered are as follows (see also the attached map):

- One Largo Town Center, the site is located at the northwest corner of Lottsford Road and Arena Drive, Largo, MD
- University Town Center, the site is located at the northwest corner of Toledo Road and Belcrest Road, Hyattsville, MD
- New Carrollton Metro Station, the site is located at approximately 4915 Ellin Road, Hyattsville, MD
- King Farm, the site is located at the southwest corner of King Farm Boulevard and Piccard Drive, Gaithersburg, MD
- Parklawn Building, the site is located at 5600 Fishers Lane, Rockville, MD

The purpose of this correspondence is to request a review of your databases to determine if your agency has any existing information/reports regarding any of the sites listed above. GSA is making this request and providing this information solely for the purpose of preparing the EA. This request does not permit the agency to conduct studies at the site or supply studies post-solicitation (ie-after the Lease is awarded) without prior notice to the Offeror and/or property owner.

Thank you, and please call if you have any questions.

Suzanne Hill, NEPA Program Specialist  
Portfolio Division  
Public Buildings Service  
National Capital Region



U.S General Services Administration Fig\_site locations.jpg  
301 7th Street, SW  
RM 7600  
Washington, DC 20407  
Office: (202)205-5821  
Cell: (202) 870-7849



GSA National Capital Region

Mr. John R. Griffin  
 Secretary  
 Maryland Department of Natural Resources  
 Tawes State Office Building C4  
 580 Taylor Avenue  
 Annapolis, MD 21401-2397

Dear Mr. Griffin:

Please be advised that the U.S. General Services Administration (GSA) intends to prepare an Environmental Assessment (EA) for the lease consolidation of the U.S. Department of Health and Human Services (HHS) in Suburban Maryland. GSA is proposing to acquire space through leasing in order to collocate four of HHS's current leased locations in Suburban Maryland into one location to improve functional efficiency. The number of Federal employees to be collocated is approximately 2,900. GSA would enter into a lease agreement for up to 935,401 rentable square feet of space. The delineated area for the lease is Suburban Maryland, within Montgomery County and Prince George's County and within 3 miles driving distance of a Metrorail station. GSA has received multiple offers for sites that are potential locations for the lease consolidation.

The EA is being prepared in accordance with Section 102 of the National Environmental Policy Act (NEPA). NEPA requires a Federal agency to provide the public with an opportunity to participate in the process of analyzing the impacts of Federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of an opportunity to assist GSA in identifying potential impacts that may occur as a result of the proposed Federal action. Your participation in this process is greatly appreciated.

GSA is accepting comments concerning the scope of the EA for 30 calendar days from the date stamped on this letter. Comments received during the scoping period will be used to refine the resource issues analyzed in the EA. GSA has identified the following as preliminary impact issues for analysis in the EA: Visual Resources; Natural Resources; Traffic and Transportation, Stormwater Management, Socioeconomics, and Sustainability.

The following sites have been offered as potential locations for the lease consolidation of HHS in Suburban Maryland:

- One Largo Town Center, the site is located at the northwest corner of Lotsford Road and Arena Drive, Largo, MD
- University Town Center, the site is located at the northwest corner of Toledo Road and Belcrest Road, Hyattsville, MD
- New Carrollton Metro Station, the site is located at approximately 4915 Ellin Road, Hyattsville, MD
- King Farm, the site is located at the southwest corner of King Farm Boulevard and Piccard Drive, Gaithersburg, MD
- Parklawn Building, the site is located at 5600 Fishers Lane, Rockville, MD

U.S. General Services Administration  
 301 7th Street, SW  
 Washington, DC 20407-0001  
 www.gsa.gov



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Shari T. Wilson  
Secretary

Anthony G. Brown  
Lieutenant Governor  
July 29, 2010

Robert M. Summers, Ph.D.  
Deputy Secretary

Ms. Suzanne Hill  
U.S. General Services Administration  
Room 7600  
301 7<sup>th</sup> Street  
Washington, DC 20407

RE: State Application Identifier: MD20100625-0617  
Project: Scoping prior to E.A.

Dear Ms. Hill:

Thank you for the opportunity to review the above referenced project. The document was circulated throughout the Maryland Department of the Environment (MDE) for review. Information is enclosed for your consideration.

Again, thank you for giving MDE the opportunity to review this project. If you have any questions or need additional information, please feel free to call me at (410) 537-4120.

Sincerely,

Joane D. Mueller  
MDE Clearinghouse Coordinator  
Office of Communications

Enclosure  
cc: Bob Rosenbush, State Clearinghouse

**US Department Of Health and Human Services Leasing Project**

Maryland Department of the Environment - Science Services Administration

**REVIEW FINDING: R1 Consistent with Qualifying Comments  
(MD2010 0625-0617)**

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

**A. Water Quality Impairments:** Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

**Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project's multiple locations are situated in the several watersheds, identified by the MD 8-digit codes below. All of which are currently impaired by several substances and subject to regulations regarding the Clean Water Act.**

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:  
[http://www.mde.state.md.us/Programs/WaterPrograms/TMDL/Maryland%20303%20dlist/2008\\_303d\\_search/index.asp](http://www.mde.state.md.us/Programs/WaterPrograms/TMDL/Maryland%20303%20dlist/2008_303d_search/index.asp)

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project's locations include the following:**

**One Largo Town Center Location (Map 1):**

Western Branch (02131103)

BOD: Tidal. A TMDL has been written and approved by EPA.

Sediments: Tidal. A TMDL is pending development.

Biological: Non-tidal. A TMDL is pending development.

**University Town Center & New Carrollton Metro Station Location (Map 2 & 3):**

Anacostia River (02140205)

Bacteria: Tidal. A TMDL has been written and approved by EPA.

Nutrients: Tidal. A TMDL has been written and approved by EPA.

Sediment: Tidal. A TMDL has been written and approved by EPA.

Trash: Tidal. A TMDL is pending development.

Trash: Non-tidal. A TMDL is pending development.

Sediment: Non-tidal. A TMDL has been written and approved by EPA.

and policy implementation procedures are located at  
<http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website:

<http://www.mde.state.md.us/ResearchCenter/Data/waterQualityStandards/Antidegradation/index.asp>

#### **ADDITIONAL COMMENTS**

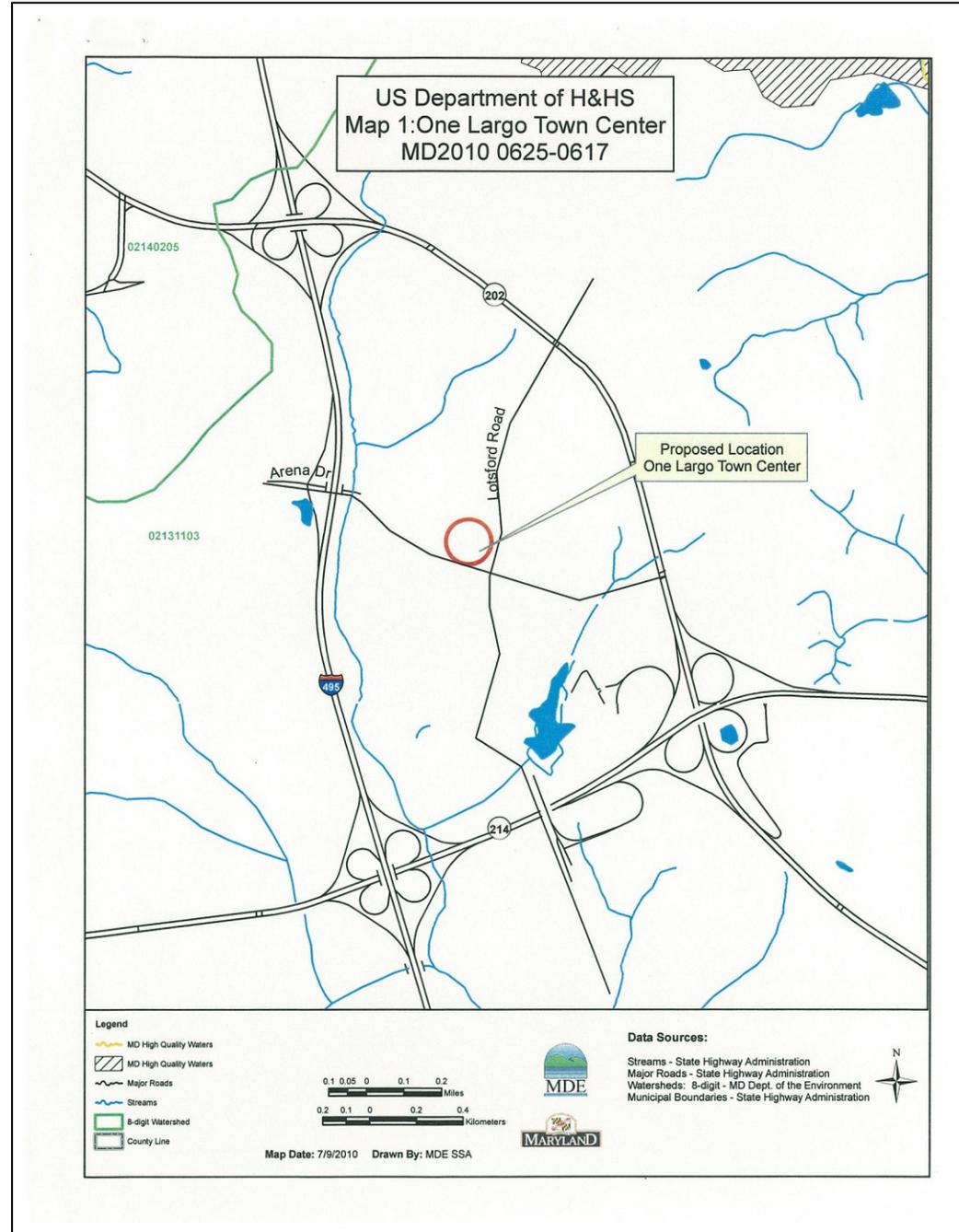
The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

Further Information:

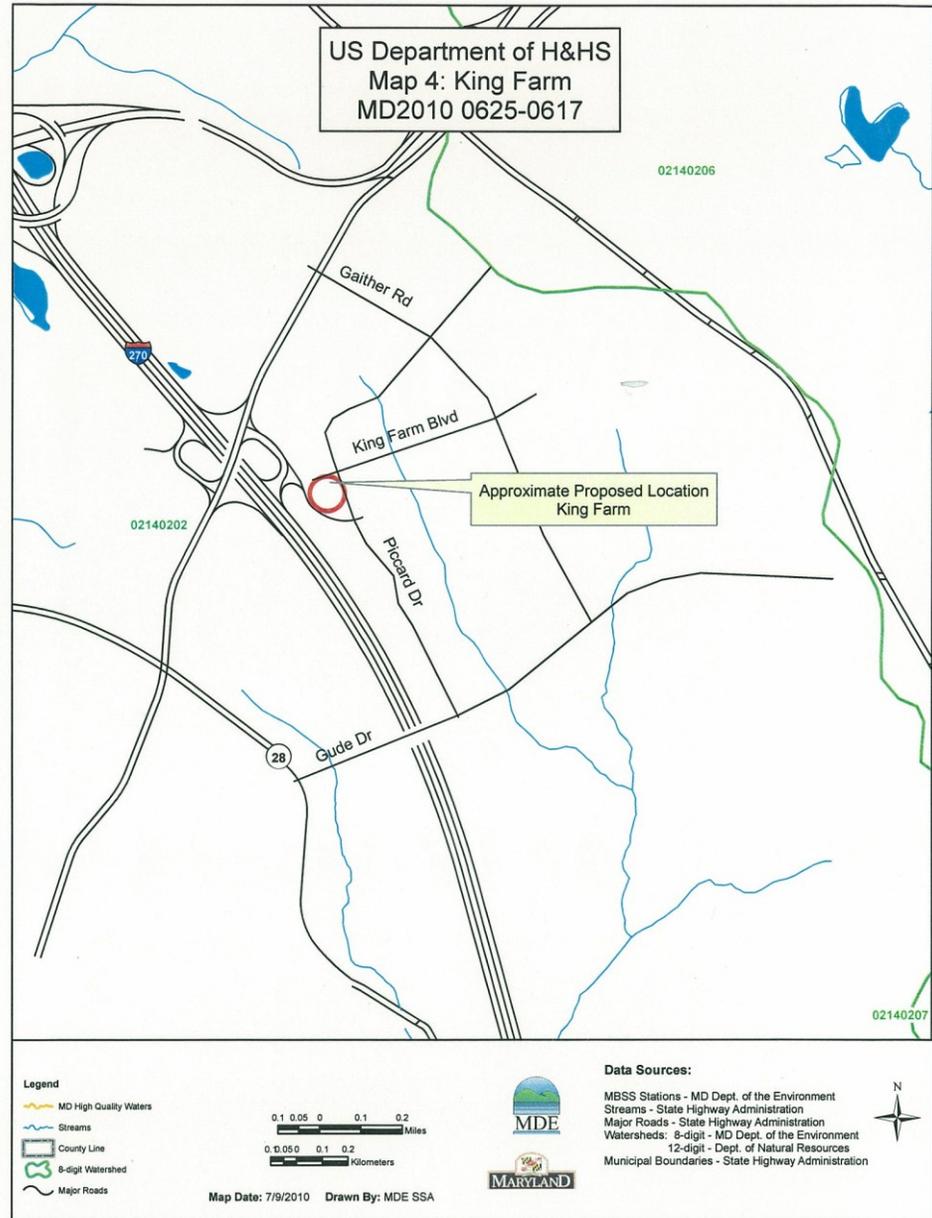
<http://www.mde.state.md.us/Programs/WaterPrograms/SedimentandStormwater/swm2007.asp>

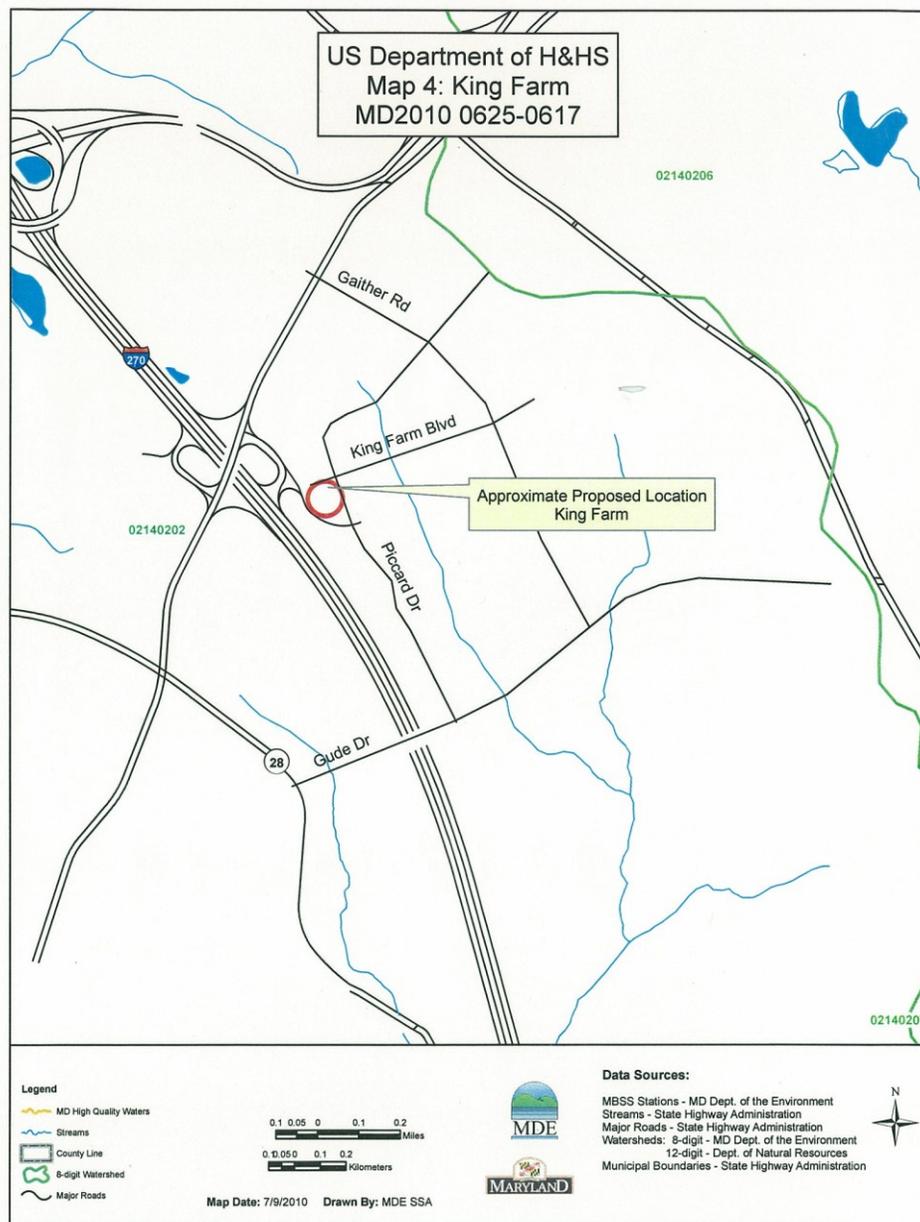
Environmental Site Design (Chapter 5):

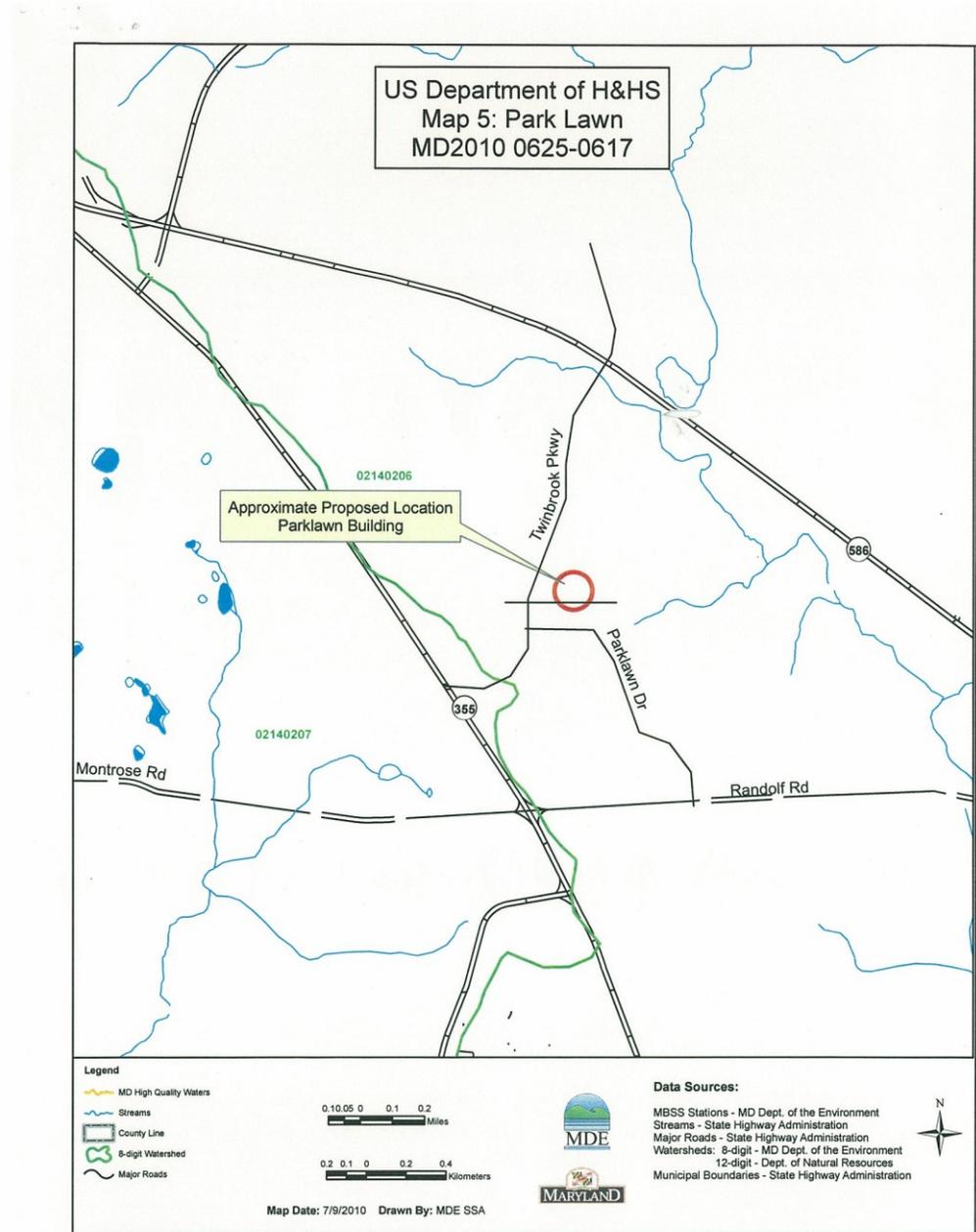
<http://www.mde.state.md.us/assets/document/Design%20Manual%20Chapter%2005%2003%2024%202009.pdf>













**MDP**  
Maryland Department of Planning

Martin O'Malley  
Governor

Anthony G. Brown  
Lt. Governor

Richard Eberhart Hall  
Secretary

Matthew J. Power  
Deputy Secretary

June 25, 2010

Ms. Suzanne Hill  
NEPA Program Specialist, Public Buildings Service, National Capital Region  
U.S. General Services Administration  
Room 7600  
301 7th Street  
Washington, DC 20407

**STATE CLEARINGHOUSE REVIEW PROCESS**

**State Application Identifier:** MD20100625-0617

**Reviewer Comments Due By:** July 11, 2010

**Project Description:** Scoping prior to E.A.: lease consolidation: +/- 935,401 square feet of space for U.S. Department of Health and Human Services: five sites identified

**Project Location:** Counties of Montgomery, and Prince George's

**Clearinghouse Contact:** Bob Rosenbush

Dear Ms. Hill:

Thank you for submitting your project for intergovernmental review. Participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps ensure project consistency with plans, programs, and objectives of State agencies and local governments. MIRC enhances opportunities for approval and/or funding and minimizes delays by resolving issues before project implementation.

The following agencies and/or jurisdictions have been forwarded a copy of your project for their review: the Maryland Departments of Natural Resources, Transportation, the Environment; the Counties of Prince George's, and Montgomery; the Maryland-National Capital Park and Planning Commission in Prince George's, and Montgomery Counties; and the Maryland Department of Planning, including the Maryland Historical Trust. They have been requested to contact your agency directly by **July 11, 2010** with any comments or concerns and to provide a copy of those comments to the State Clearinghouse for Intergovernmental Assistance. Please be assured that after **July 11, 2010** all MIRC requirements will have been met in accordance with Code of Maryland Regulations (COMAR 34.02.01.04- .06). The project has been assigned a unique State Application Identifier that should be used on all documents and correspondence.

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at [rosenbush@mdp.state.md.us](mailto:rosenbush@mdp.state.md.us). Thank you for your cooperation with the MIRC process.

Sincerely,



Linda C. Janey, J.D., Assistant Secretary  
for Clearinghouse and Communications

LCJ:BR

cc: Beth Cole – MHT\*

Roland Limpert – DNR\*

Cindy Johnson – MDOT\*

Joane Mueller – MDE\*

Beverly Warfield – PGEO\*

Diane Jones – MTGM\*

Kate Fritz – MNCPPCP\*

John Carter – MNCPPCM\*

Steve Allan – MDPL\*

Mike Paone – MDPL\*

10-0617\_NDC.NEW.doc

301 West Preston Street • Suite 1101 • Baltimore, Maryland 21201-2305  
Telephone: 410.767.4500 • Fax: 410.767.4480 • Toll Free: 1.877.767.6272 • TTY Users: Maryland Relay  
Internet: [Planning.Maryland.gov](http://Planning.Maryland.gov)



Maryland Department of Planning  
Maryland Historical Trust

*Martin O'Malley*  
Governor

*Anthony G. Brown*  
Lt. Governor

*Richard Eberhart Hall*  
Secretary

*Matthew J. Power*  
Deputy Secretary

July 14, 2010

Ms. Suzanne Hill  
NEPA Program Specialist  
Portfolio Management Division  
Public Buildings Service  
GSA National Capital Region  
301 7<sup>th</sup> Street, SW  
Room 7600  
Washington DC 20407

Re: Lease Consolidation for the U.S. Department of Health and Human Services  
In Suburban Maryland  
State Clearinghouse No. MD20100625-0617  
Montgomery and Prince George's County, Maryland

Dear Ms. Hill:

Thank you for your recent letter, dated and received by the Maryland Historical Trust (Trust) on June 14, 2010, regarding the above-referenced undertaking. The Maryland State Clearinghouse for Intergovernmental Assistance also provided the Trust with notice of GSA's study for this project.

The Trust, Maryland's State Historic Preservation Office, will be involved in the review of the project for its effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. GSA's scoping process for the Environmental Assessment should include appropriate consideration of cultural resources and address Section 106 consultation requirements. We offer the following preliminary comments regarding historic preservation issues for this project and request further information on the proposed undertaking.

**Project Description:** According to your letter, GSA proposes to acquire space through leasing in order to consolidate four locations of the U.S. Department of Health and Human Services (HHS) in one combined location in Suburban Maryland. GSA would lease up to 935,401 square feet of office space in Montgomery or Prince George's County, within 3 miles driving distance of a Metrorail station. The leased space may be within existing or newly constructed facilities. GSA has received multiple offers for sites that may be potential locations for the leased consolidation including: One Largo Town Center, University Town Center, New Carrollton Metro Station, King Farm, and Parklawn Building. Depending upon the site selected for the consolidation, the project may have the potential to affect historic and archeological properties, particularly for new construction or use of space within or near historic properties.

**Section 106 Review:** In order to continue our review of the proposed undertaking and provide informed comments on the project's effects on historic and archeological properties, we request that GSA provide us with the following information when it becomes available in the project planning process:

- Detailed descriptions of the various locations under consideration, including dates of construction for any that entail existing facilities;
- Map locations showing the exact location and extent of the project alternatives;

100 Community Place • Crownsville, Maryland 21032-2023  
Telephone: 410.514.7600 • Fax: 410.987.4071 • Toll Free: 1.800.756.0119 • TTY Users: Maryland Relay  
Internet: [www.marylandhistoricaltrust.net](http://www.marylandhistoricaltrust.net)



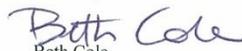
Suzanne Hill  
Lease Consolidation for the U.S. Department of Health and Human Services  
In Suburban Maryland  
July 14, 2010  
Page 2 of 2

- Photographs of any historic properties, or properties older than 50 years, that are located within or adjacent to the alternative sites;
- Copies of any comments regarding cultural resources or historic preservation issues that GSA receives from the public, local governments, or other sources;
- GSA's assessment of the undertaking's effects on historic properties, with supporting justification.

Once we have received the additional information requested in this letter, the Trust will continue its review of the undertaking and provide appropriate comments and recommendations.

We look forward to working with GSA to successfully complete the project's historic preservation review. If you have questions or require further assistance, please contact Amanda Apple (for historic built environment) at 410-514-7630 or [aapple@mdp.state.md.us](mailto:aapple@mdp.state.md.us) or me (for archeology) at 410-514-7631 / [bcole@mdp.state.md.us](mailto:bcole@mdp.state.md.us). Thank you for providing us this opportunity to comment.

Sincerely,



Beth Cole  
Administrator, Project Review & Compliance  
Maryland Historical Trust

EJC/ 20103229

cc: Bob Rosenbush (MDP)  
Scott Whipple (M-NCPPC, Montgomery County)  
Gail Rothrock (M-NCPPC, Prince George's County)

Martin O'Malley, *Governor*  
Anthony G. Brown, *Lt. Governor*



Beverley K. Swaim-Staley, *Secretary*  
Neil J. Pedersen, *Administrator*

July 1, 2010

Ms. Suzanne Hill, NEPA Program Specialist  
Portfolio Management Division  
Public Buildings Service  
National Capital Region  
US General Services Administration  
RM 7600  
301 7<sup>th</sup> Street, SW  
Washington DC 20407

Dear Ms. Hill:

The Maryland State Highway Administration (SHA) received the June 14 letter from Mr. Bart Bush, Regional Commissioner, Public Buildings Service, regarding the U.S. General Services Administration's (GSA) intent to prepare an Environmental Assessment (EA) for the U.S. Department of Health and Human Services' consolidation in suburban Maryland. Mr. Bush asked me to respond to you, and it is my pleasure to do so.

The SHA appreciates the opportunity to provide assistance and comments during the development of the EA for these consolidation efforts. At this stage of your process, SHA's comments are limited, until further investigation is complete and documents are available for review and comment. The SHA looks forward to being an active stakeholder, to ensure that the safety and integrity of the state highway network is maintained in an acceptable manner. Because of the high number of employees (2,900) expected at the sites under evaluation, the EA studies should evaluate the traffic impacts of the various alternatives on the state roadway network, along with improvements required to mitigate those traffic impacts. This includes ensuring that the EA includes the traffic mitigation measures and roadway improvements for all locations considered. SHA would be pleased to participate in meetings with those who are preparing traffic analyses to discuss methodology and assumptions prior to their analysis being performed.

As more information becomes available, SHA looks forward to reviewing the EA to provide feedback on proposed traffic-mitigation measures and impacts to the state's roadways and rights-of-way. The SHA's Engineering Access Permits Division will coordinate the internal SHA reviews of this development-related EA and subsequent roadway-improvements plans. All roadway work within SHA right-of-way will require an access permit from SHA. The GSA would apply for an access permit when engineering plans for roadway improvements have completed a pre-permit review.

My telephone number/toll-free number is [410-545-0400](tel:410-545-0400) or [1-800-206-0770](tel:1-800-206-0770).  
Maryland Relay Service for Impaired Hearing or Speech 1.800.735.2258 Statewide Toll Free

Street Address: 707 North Calvert Street • Baltimore, Maryland 21202 • Phone 410.545.0300 • [www.roads.maryland.com](http://www.roads.maryland.com)

Ms. Suzanne Hill  
Page Two

Thank you again for your letter. If we may be of further assistance, please do not hesitate to contact me or Mr. Steven D. Foster, Chief, Engineering Access Permits Division, SHA at 410-545-5601, toll free at 1-800-876-4742 or via email at sfoster1@sha.state.md.us.

Sincerely,



Neil J. Pedersen  
Administrator

cc: Mr. Steven D. Foster, Chief, Engineering Access Permits Division, SHA



*Martin O'Malley, Governor*  
*Anthony G. Brown, Lt. Governor*  
*John R. Griffin, Secretary*  
*Joseph P. Gill, Deputy Secretary*

July 2, 2010

Mr. Bart Bush  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW  
Washington, DC 20407

Dear Mr. Bush:

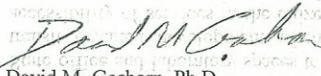
Thank you for your letter to Secretary John Griffin regarding the lease consolidation of the U.S Department of Health and Human Services (HHS) in Suburban Maryland. Secretary Griffin has asked me to respond on his behalf.

The State of Maryland supports the location of public facilities in existing communities that support Smart, Green and Growing efforts. Governor O'Malley's 2009 Executive Order calls for State office and laboratory spaces to be located within a half-mile radius of transit stations at a transit oriented development whenever appropriate and feasible, without diminishing the accessibility of services to the citizens of the State. It is important to work with our federal partners to support these goals and efforts.

We look forward to the Environmental Assessments document that will provide more detailed information on the potential locations. We understand that the Department of Natural Resources will have 30 days to review the document and provide comments. The review will be conducted by our Environmental Review division. The contact for this review will be Greg Golden, [ggolden@dnr.state.md.us](mailto:ggolden@dnr.state.md.us) or 410-260-8331.

Thank you again for your letter. If you have any questions, please contact me at [dgoshorn@dnr.state.md.us](mailto:dgoshorn@dnr.state.md.us) or 410-260-8119.

Sincerely,



David M. Goshorn, Ph.D.  
Director  
Office of Sustainable Future

cc: Greg Golden  
Suzanne Hill

Tawes State Office Building – 580 Taylor Avenue – Annapolis, Maryland 21401  
410-260-8DNR or toll free in Maryland 877-620-8DNR – [www.dnr.maryland.gov](http://www.dnr.maryland.gov) – TTY Users Call via the Maryland Relay



**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

June 24, 2010

Ms. Suzanne Hill  
NEPA Program Specialist, Portfolio Management Division  
Public Buildings Service, National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW, RM 7600  
Washington, DC 20407-001

**SUBJECT:** Comments on the future Environmental Assessment (EA) for the lease consolidation of the U.S. Department of Health and Human Services (HHS). MR No. 10726-GSA-2.

Dear Ms. Hill:

Thank you for the opportunity to comment on the EA scope in the lease consolidation for HHS for the Montgomery County site. We would like to strongly encourage you to consider reusing the Parklawn Building located at 5600 Fishers Lane, the only building site listed for consideration for the HHS lease consolidation. The reuse of 1.3 million square foot office building and surrounding vacant site would offer the functional efficiency you are looking for in a location as well as make fiscal and environmental sense.

The Montgomery County Council recently approved and adopted the Twinbrook Sector Plan to create a technology node that builds on existing federal government agencies and private businesses. Currently, the NIH, HHS and a few FDA offices are located in the Twinbrook area. The Parklawn Building is located just over a ¼ of a mile from the Twinbrook metro station and it is one of the largest office buildings in Montgomery County. Recommendations for the Parklawn site include grandfathering the existing height and density (5.16 FAR) and rezoning the building to a mixed-use zone "to keep the building viable and generate employees, residents, and street activity at an urban scale." (p. 40) Re-using the Parklawn Building would be the most sustainable—both economically and environmentally.

Located two blocks from the Parklawn Building at the Metro station, is an award winning, 2.2 million square foot LEED Gold mixed-use community that will provide 1,595 multi-family residential units; 220,000 square feet of ground-floor retail; 325,000 square feet of Class-A commercial space and a new park.

With the synergy of a new mixed use community at the Metro station, the existing advanced technology and biotechnology functions in Twinbrook, the presence of other federal agencies and the reuse of 1.3 million square foot building, the 5600 Fishers Lane site would offer the efficiencies you are looking for in a location. I've attached a copy of the Twinbrook Sector Plan for your review. If you have any questions, please feel free to contact John Carter, Chief of Urban Design at (301) 495-4575 or via email at [John.Carter@montgomeryplanning.org](mailto:John.Carter@montgomeryplanning.org).

Sincerely,

  
Rollin Stanley  
Planning Director

cc. Mr. Bart Bush, Regional Commissioner  
John Carter, Chief, Urban Design Division

8787 Georgia Avenue, Silver Spring, Maryland 20910 Director's Office: 301.495.4500 Fax: 301.495.1310

[www.MontgomeryPlanning.org](http://www.MontgomeryPlanning.org)

100% recycled paper



14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-4366  
www.mncppc.org/pgco  
(301) 952-3595  
D0-061402

June 28, 2010

Mr. Bart Bush  
Regional Commissioner  
Public Buildings Service  
GSA National Capital Region  
301 7<sup>th</sup> Street, SW  
Washington, DC 20407-0001

**RE: Request for Comments Concerning the Scope  
of an Environmental Assessment in Suburban  
Maryland**

Dear Mr. Bush:

Thank you for your letter dated June 14, 2010, regarding the preparation of an Environmental Assessment (EA) for the lease consolidation of the U.S. Department of Health and Human Services (HHS) in suburban Maryland. As you know, three of the potential sites are located within Prince George's County. Planning Department staff contacted Ms. Suzanne Hill of General Services Administration and submitted electronic correspondence regarding project web sites relevant to the planning areas where each of the three sites is located. When Ms. Hill provides Planning Department staff with specific parcel information, we will share any approved environmental plans specific to each site.

We look forward to reviewing the draft EA when it is released and providing comments at that time. Should you have any further questions, please contact Kate Fritz at [Katharine.Fritz@ppd.mncppc.org](mailto:Katharine.Fritz@ppd.mncppc.org) or 301-952-5402.

Sincerely,

Fern V. Piret  
Planning Director

cc: Suzanne Hill, NEPA Program Specialist, GSA  
John Funk, Chief, Countywide Planning Division  
Maria Martin, Supervisor, Special Projects Section  
Kate Fritz, Senior Planner, Countywide Planning Division



**THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION**

14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-4366  
www.mncppc.org/pgco

*WPT 7/27*

**Historic Preservation Section, Countywide Planning Division, M-NCPCC 301-952-3520**

July 19, 2010

Bart Bush  
Regional Commissioner  
Public Buildings Service  
US GSA  
301 7<sup>th</sup> Street, SW  
Washington, DC 20407-0001

Subject: Section 102 National Environmental Policy Act  
GSA - HHS 3 Locations in Prince George's County 2 in Montgomery County

Dear Mr. Bush:

I have reviewed your letter to Ms. Gail Rothrock, Prince George's County Historic Preservation Section Supervisor, regarding the three proposed locations of HHS offices within 3 miles of a Metrorail station within Prince George's County, Maryland.

Site 1 - One Largo Town Center is within one mile of Prince George's County Historic Site Waring's Grove PG:70-004. Site 2 - University Town Center is within one mile of National Register Historic Site Hitching Post Hill/Ash Hill PG:68-001 and Prince George's County Historic Sites Bloomfield/Deakman House PG:66-029-05 and Paxton House PG:68-076. Site 3 - New Carrollton Metro Station is within one mile of Prince George's County Historic Sites Thomas Hunster House PG:69-023-27 and Wormley House PG:69-023-17. Sites 4 and 5 - are within Montgomery County, Maryland. Please refer to that jurisdiction for comments.

Our office knows of no effect on historic resources or archeological resources or Native American religious sites in this area, although for a definite answer to this question, you should contact Beth Cole at the Maryland Historical Trust.

Thank you for the opportunity to comment on this project.

Sincerely,  
*Cecelia Garcia Moore*  
Cecelia Garcia Moore  
Historic Preservation Section  
301-952-3756

I:\HISTORIC\106\2010\Other\GSA-HHS 3 PGC locations.docx



OFFICE OF THE COUNTY EXECUTIVE  
ROCKVILLE, MARYLAND 20850

Isiah Leggett  
*County Executive*

July 8, 2010

Ms. Suzanne Hill, NEPA Program Specialist  
Portfolio Management Division  
Public Buildings National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW, RM 7600  
Washington, DC 20407

Dear Ms. Hill:

I am writing in response to your letter dated June 14, 2010 requesting comments to the scope of the Environmental Assessment process for five potential Department of Health and Human Services sites. I appreciate the opportunity to comment on issues that are important in the Environmental Assessment process.

There are a number of critical factors that we feel need to be examined for each of the proposed alternatives, factors that are highlighted below.

In the Traffic and Transportation section:

- One of the most important factors to consider is the location of HHS employees by their residences and their current commuting patterns.
- We hope that GSA will analyze how the commuting patterns will change depending on the selected site and the environmental impacts of these changes. Increased travel time and distance, whether by mass transit or by car, should be taken into account and changes in greenhouse gas emissions and air quality should be quantified.
- In considering all alternative scenarios, we suggest that GSA analyze future transportation demand due to increases in regional traffic and direct traffic loads for the selected development. The best options for reducing or meeting that demand need to be identified through demand management and improvements to the transportation system. Specifically, greatly enhanced transit, improved roadway connectivity, and better service for pedestrians and bicyclists will have to be provided for the sites were not only a building needs to be constructed, but also the infrastructure needs to be developed, as opposed to the sites where the infrastructure already exists.
- We suggest that the capacity of mass transit to handle passenger increases, including capacity for increased ridership for each adjacent Metro Station, be analyzed.

Ms. Suzanne Hill, NEPA Program Specialist  
July 8, 2010  
Page 2 of 2

- We also believe that it is important that the assessment place value on proximity to supporting services that would minimize the need for additional and longer trips whether it is related to access to agencies, business and services related to HHS's work or to the services that a workforce of 4000 needs such as stores, dry cleaners, restaurants, etc.

In the Socio-Economic Impacts section:

- The assessment should address the cost of developing raw land and the related infrastructure needed to support the selected development.
- If the HHS moves to a new location, the adverse impacts on local economy at the current site should be quantified.
- The likelihood and cost of relocating HHS employee households should also be analyzed along with the burden on school systems resulting from such relocations.

In the Sustainability section:

- The Presidential Memorandum of June 10, 2010 directs GSA and all federal agencies to reduce the costs associated with federal leases and better utilize real property assets. We hope that the assessment will take into account how each of the proposed alternatives complies with the directives of this memorandum. An analysis of overhead costs of new construction versus energy efficiency and workplace management improvements in existing buildings should be conducted.
- The overhead and administrative costs of relocating 2,900 employees need to be factored in.

Thank you again for the opportunity to be engaged in the EA process. We look forward to reviewing and commenting on the draft Environmental Assessment once it becomes available.

Please let us know if we can provide any additional information.

Sincerely,



Isiah Leggett  
County Executive

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+CITY OF NEW CARROLLTON MEMORANDUM

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**TO:** MS. SUZANNE HILL, NEPA PROGRAM SPECIALIST  
**FROM:** MIKE DOWNES, CITY ADMINISTRATIVE OFFICER   
**SUBJECT:** REQUEST FOR IMPACT STATEMENT ON HUMAN ENVIRONMENT, HHS BUILDING AT  
NEW CARROLLTON METRO STATION  
**DATE:** 6/22/10  
**CC:** N/A

---

PLEASE ACCEPT THE ENCLOSED LETTER AS THE CITY OF NEW CARROLLTON'S  
COMMENTS RELATIVE TO THE POSITIVE IMPACT OF THE PROPOSED LOCATION OF A NEW  
HHS BUILDING AT THE NEW CARROLLTON METRO STATION.

CC: ENCLOSURE



## CITY of NEW CARROLLTON

6016 PRINCESS GARDEN PARKWAY • NEW CARROLLTON, MARYLAND 20784-2898  
(301) 459-6100 FAX (301) 459-8172

June 1, 2010

Martha N. Johnson, Administrator  
United States General Services Administration  
1800 F Street, NW  
Washington, DC 20405

Dear Administrator Johnson:

The Mayor and Council of the City of New Carrollton, Maryland want to express our strong support for the relocation of the Health and Human Services (HSS) Headquarters to the proposed New Carrollton Metro Station site in Prince George's County. From our association with the Carl Williams Group and perusal of the plans and concept drawings of the proposed HHS Building, we are confident that the Carl Williams Group will deliver an iconic, serviceable facility which will stand as a yardstick by which future GSA buildings will be measured.

As you are aware, the County recently updated the zoning for the New Carrollton Metro Station development area, adopting a Transit District Development Plan to stimulate development of the area. Maryland National Capital Park and Planning project manager Bill Washburn was quoted as saying, "We think the plan has the potential to create a real downtown for Prince George's County." This new development will provide convenient upscale housing, restaurants, services and amenities for the existing IRS and CSC workforces and the HHS workforce should you choose to relocate here. Meanwhile, our city offers a variety of retail and service establishments along Rte. 450, including our Town Center's Four Points by Sheraton and adjacent food establishments, all eager to serve the needs of the HHS workforce.

We urge you to give serious consideration to the New Carrollton Metro site and the Carl Williams Group's proposal. The multi-modal transportation element of the New Carrollton Metro Station site is paramount to the satisfaction of a potentially relocated workforce, and the addition of the Purple Line, with the ability to serve Montgomery County residents, will further add to this satisfaction.

Sincerely,

  
Andrew C. Hanko  
Mayor

  
Richard Bechtold  
Council Chairman

Cc: The Honorable Steny Hoyer, U.S. House of Representatives  
The Honorable Eleanor Holmes Norton, U. S. House of Representatives  
The Honorable Donna Edwards, U.S. House of Representatives

## KING FARM

---

Ms. Suzanne Hill, NEPA Program Specialist  
Portfolio Management Division  
Public Buildings Service  
National Capitol Region  
US General Services Administration  
301 7<sup>th</sup> Street SW  
RM 7800  
Washington DC 20407

July 12, 2010

Dear Ms. Hill:

On behalf of the King Farm Citizen's Assembly, I am submitting comments regarding the environmental impact of the construction of a new building to house 2900 Health and Human Services employees at the South West corner of King Farm Blvd and Picard Drive. As President of the Assembly, we would gladly welcome you to the King Farm community.

King Farm is a Neo-traditional mixed-use community, comprised of residential, retail, and commercial office space. We have over 3000 residential units and 8500 residents situated between I-270 and the Shady Grove Metro, within a mile of the new Inter County Connector (ICC). King Farm is located in the heart of Montgomery County's bio-technology corridor, near the National Institutes of Health, the Substance Abuse and Mental Health Services Administration (SAMSHA), easily accessible via Metro to downtown Washington, and less than a 20 minute drive to Johns Hopkins University Shady Grove Campus, Montgomery College, and the newly approved Shady Grove Life Sciences Center. King Farm is home to many federal workers from various agencies, National Institute of Health (NIH) scientists and National Institute of Science and Technology (NIST) employees. Most importantly, the Shady Grove Metro Station, across MD355 from King Farm, is 6 minutes and two stops away from the current HHS building at Parklawn Drive. This is close enough for employees to work face-to-face with their colleagues when needed while avoiding additional traffic congestion. The King Farm Shuttle Service runs from 6:30 am to 7:30 pm between numerous points in King Farm and the Shady Grove Station.

Recently, one of our larger commercial tenants commissioned a study that indicated that because of their proximity to metro, and their decision to subsidize fares and provide a shuttle bus to the metro, 40% more of their employees took metro than they had anticipated. This reduced the number of vehicles on the roads, and substantially slashed their costs for maintaining the parking facilities. We are hopeful that you will be able to use either the King Farm Shuttle, or a similar shuttle from the Shady Grove Metro to your office and save taxpayer funds by minimizing the need for parking spaces.

We have two environmental concerns and one suggestion to bring to your attention. King Farm is designed as a walking community, however we have a number of trucks that use Redland Blvd as a cut-through for construction traffic. We ask as a courtesy to the residents, that construction traffic be

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King Farm Citizens Assembly • 300 Saddle Ridge Circle • Rockville, MD 20850 • Phone (301) 987-0122 • Fax (301) 947-6546

routed either via I-270, or down Shady Grove Road, which are better constructed to handle heavy truck loads. Additionally, we have a number of natural green spaces within the community, and ask that design and construction limit the amount of storm water discharge into our natural areas.

Finally, we offer you a suggestion that meets both the goals of the community and President Obama's emphasis on alternative energy sources: the installation of solar panels on the facility. As a community, King Farm is encouraging the installation of solar panels by the residents and is taking steps to potentially place them on the roofs of our community centers. Installing solar panels during construction could greatly offset the long-term utility costs associated with running the building, and decrease the carbon footprint of your employees. Given that your facility would be viewable from I-270, installing solar panels would be a literal beacon of light to other Federal Agencies who wish to support the administration's green energy policies.

In short, on behalf of the King Farm Citizen's Assembly, we would gladly welcome you to our community, and look forward to working with you in the future to develop this project.

Sincerely,



Martin Green

President, King Farm Citizen's Assembly

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## Appendix C – Section 106 Consultation

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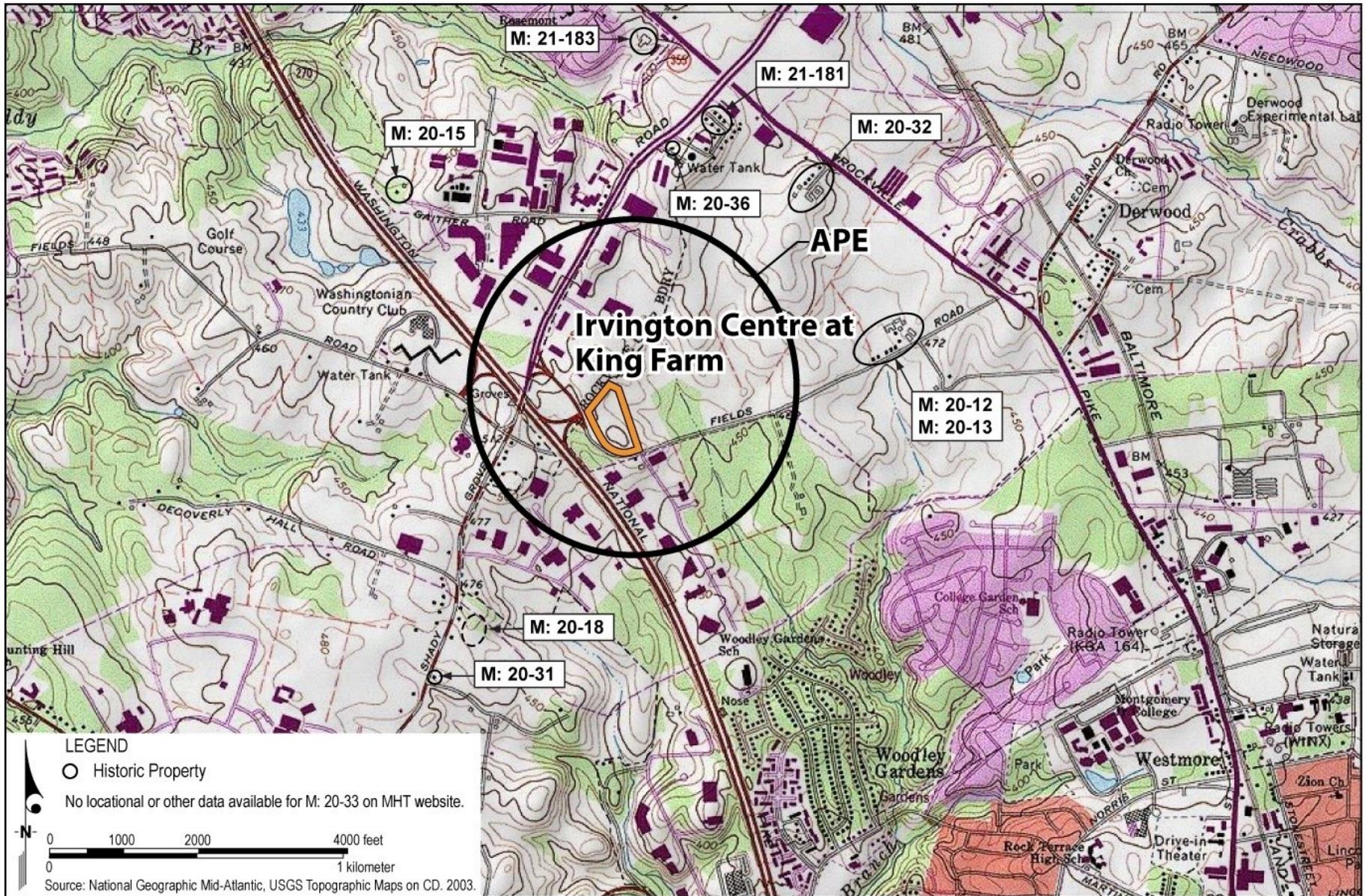


Figure C-1

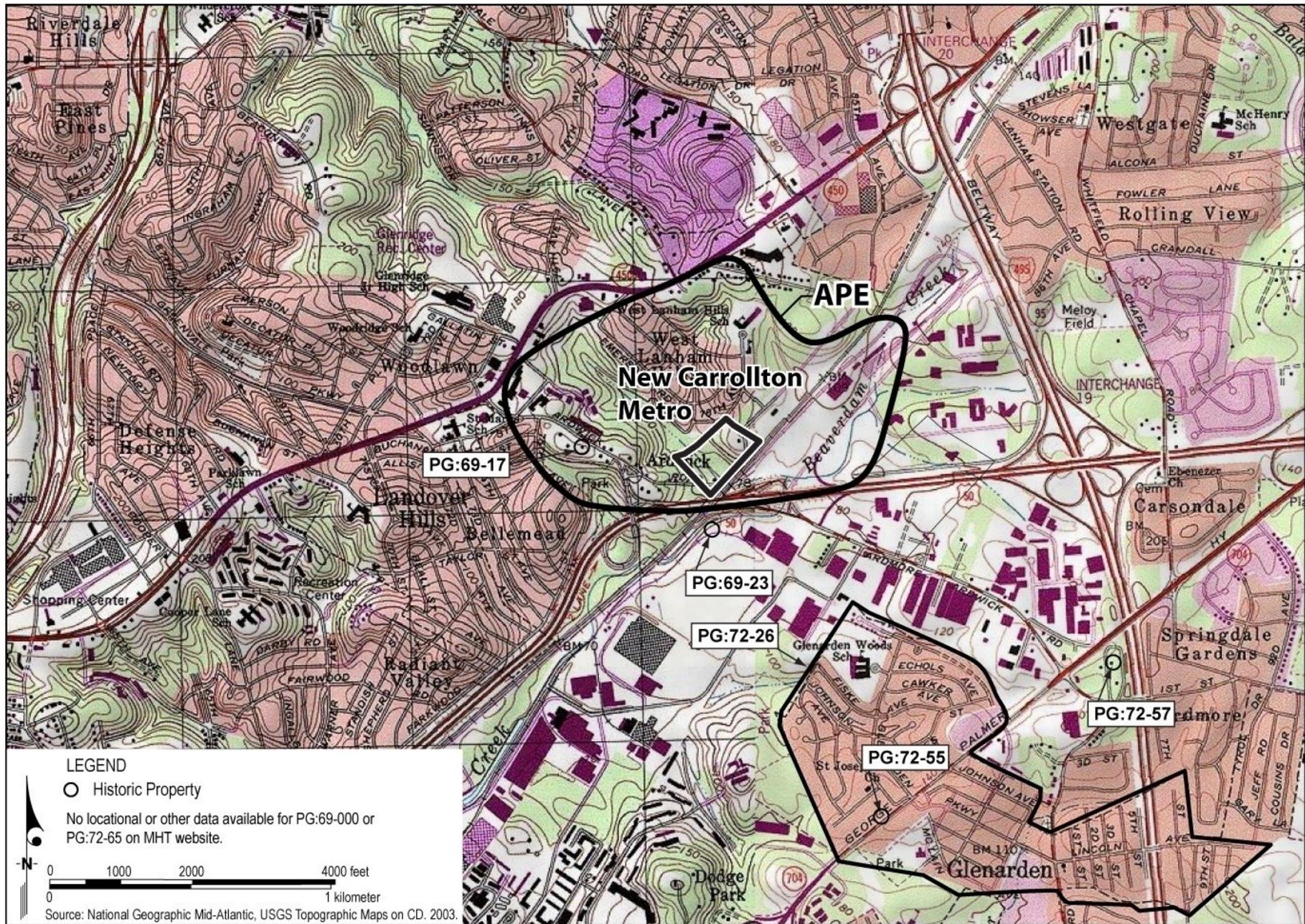


Figure C 2

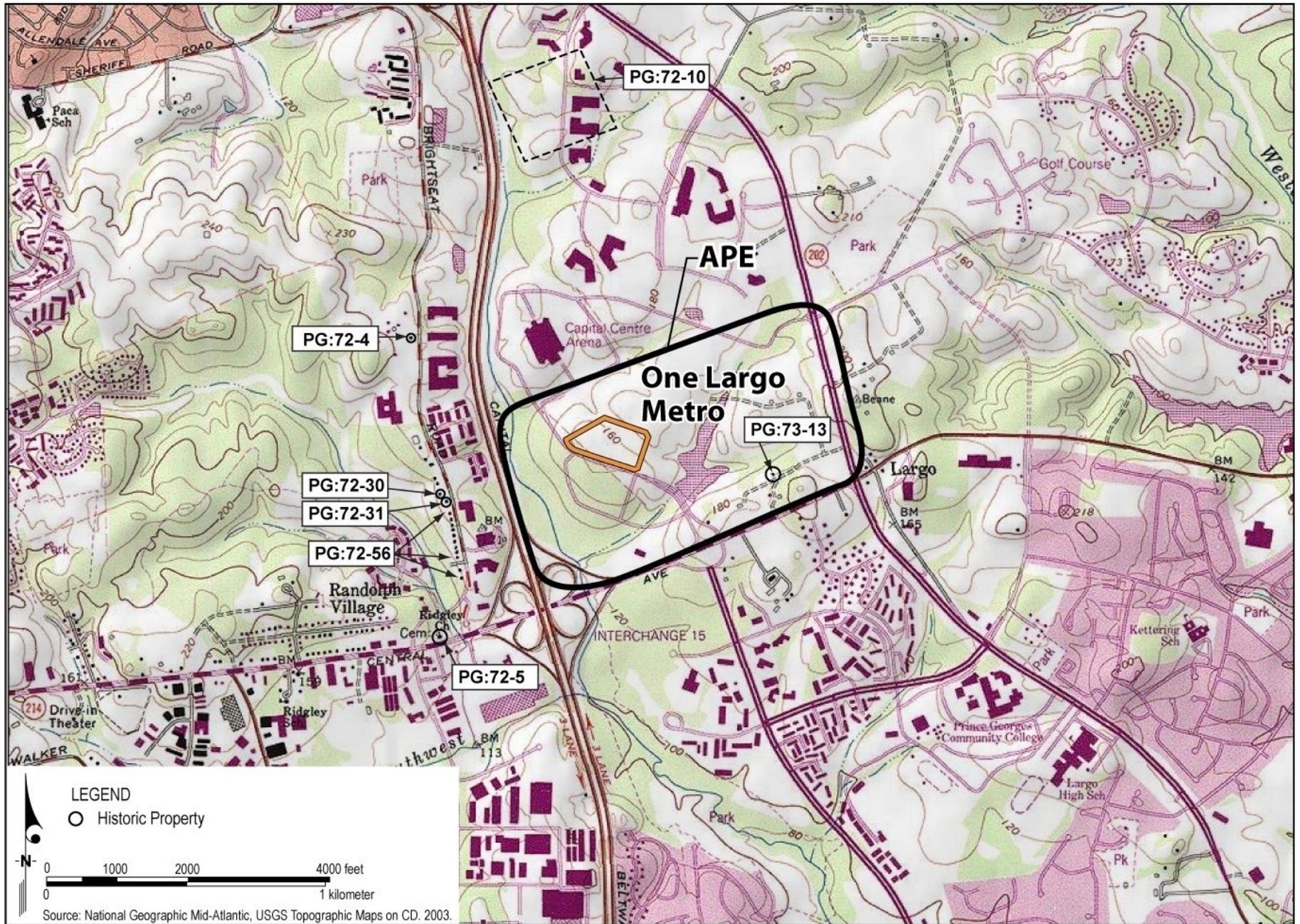


Figure C 3

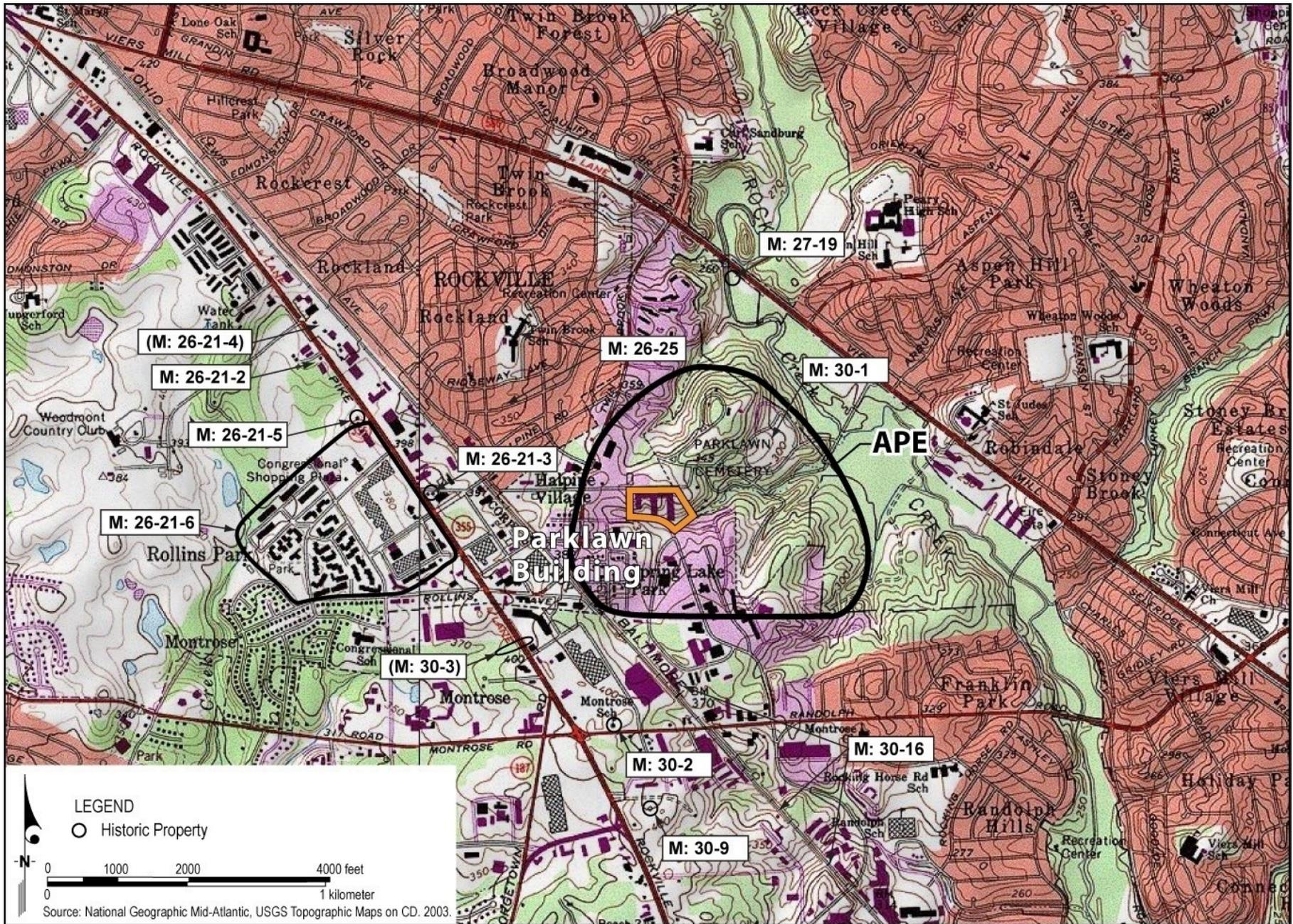


Figure C 4

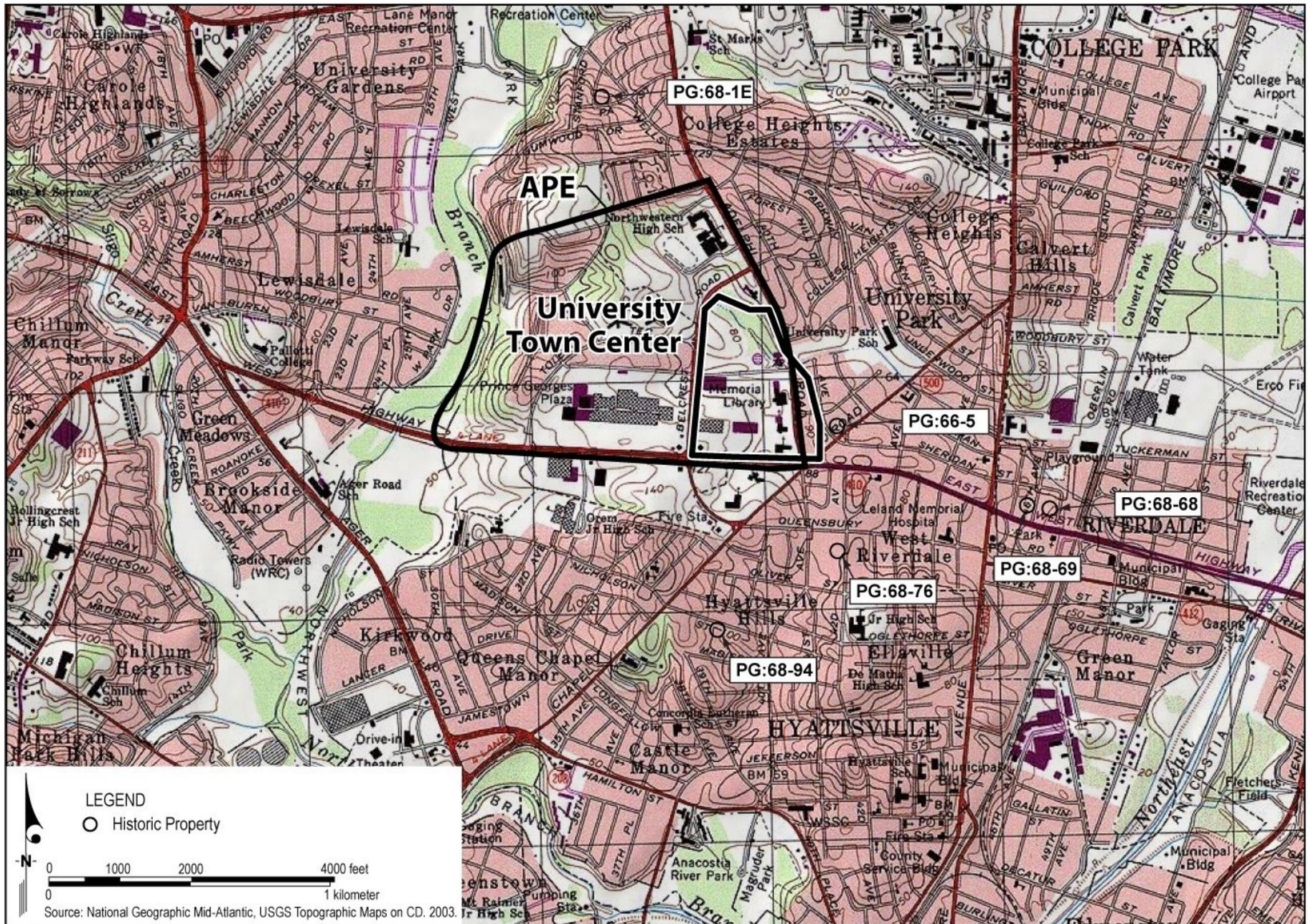


Figure C 5

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## **Appendix D – Endangered Species Act Agency Coordination**

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## United States Department of the Interior



### FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office  
177 Admiral Cochrane Drive  
Annapolis, Maryland 21401  
<http://www.fws.gov/chesapeakebay>

June 24, 2010

Greenhorne & O'Mara  
6110 Frost Place  
Laurel, MD 20707

*RE: Largo Town center, University Town Center, New Carrollton Metro Center, King Farm and Parklawn MD*

Dear Duncan Simpson:

This responds to your letter, received, June 2, 2010, requesting information on the presence of species which are federally listed or proposed for listing as endangered or threatened within the vicinity of the above reference project area. We have reviewed the information you enclosed and are providing comments in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the project impact 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 information on the presence of other rare species, you should contact Lori Byrne of the Maryland Wildlife and Heritage Division at (410) 260-8573.

Effective August 8, 2007, under the authority of the Endangered Species Act of 1973, as amended, the U.S. Fish and Wildlife Service (Service) removed (delist) the bald eagle in the lower 48 States of the United States from the Federal List of Endangered and Threatened Wildlife. However, the bald eagle will still be protected by the Bald and Golden Eagle Protection Act, Lacey Act and the Migratory Bird Treaty Act. As a result, starting on August 8, 2007, if your project may cause "disturbance" to the bald eagle, please consult the "National Bald Eagle Management Guidelines" dated May 2007.



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If any planned or ongoing activities cannot be conducted in compliance with the National Bald Eagle Management Guidelines (Eagle Management Guidelines), please contact the Chesapeake Bay Ecological Services Field Office at 410-573-4573 for technical assistance. The Eagle Management Guidelines can be found at:

<http://www.fws.gov/migratorybirds/issues/BaldEagle/NationalBaldEagleManagementGuidelines.pdf>.

In the future, if your project can not avoid disturbance to the bald eagle by complying with the Eagle Management Guidelines, you will be able to apply for a permit that authorizes the take of bald and golden eagles under the Bald and Golden Eagle Protection Act, generally where the take to be authorized is associated with otherwise lawful activities. This proposed permit process will not be available until the Service issues a final rule for the issuance of these take permits under the Bald and Golden Eagle Protection Act.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if construction in wetlands is proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Devin Ray at (410) 573-4531.

Sincerely,



Leopoldo Miranda  
Field Supervisor



*Martin O'Malley, Governor*  
*Anthony G. Brown, Lt. Governor*  
*John R. Griffin, Secretary*  
*Joseph P. Gill, Deputy Secretary*

August 11, 2010

Duncan Simpson  
Greenhorne and O'Mara  
6110 Frost Place  
Laurel, MD 20707

**RE: Environmental Review for proposed consolidation Department of Health and Human Services at 5 potential sites; Largo Town Center, University Town Center, New Carrollton Metro Center, King Farm, Parklawn, Montgomery/Prince George's County, MD.**

Dear Mr. Simpson:

The Wildlife and Heritage Service has determined that there are no State or Federal records for rare, threatened or endangered species within the boundaries of the project site as delineated. As a result, we have no specific comments or requirements pertaining to protection measures at this time. This statement should not be interpreted however as meaning that rare, threatened or endangered species are not in fact present. If appropriate habitat is available, certain species could be present without documentation because adequate surveys have not been conducted.

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# 2010.0786.mopg

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