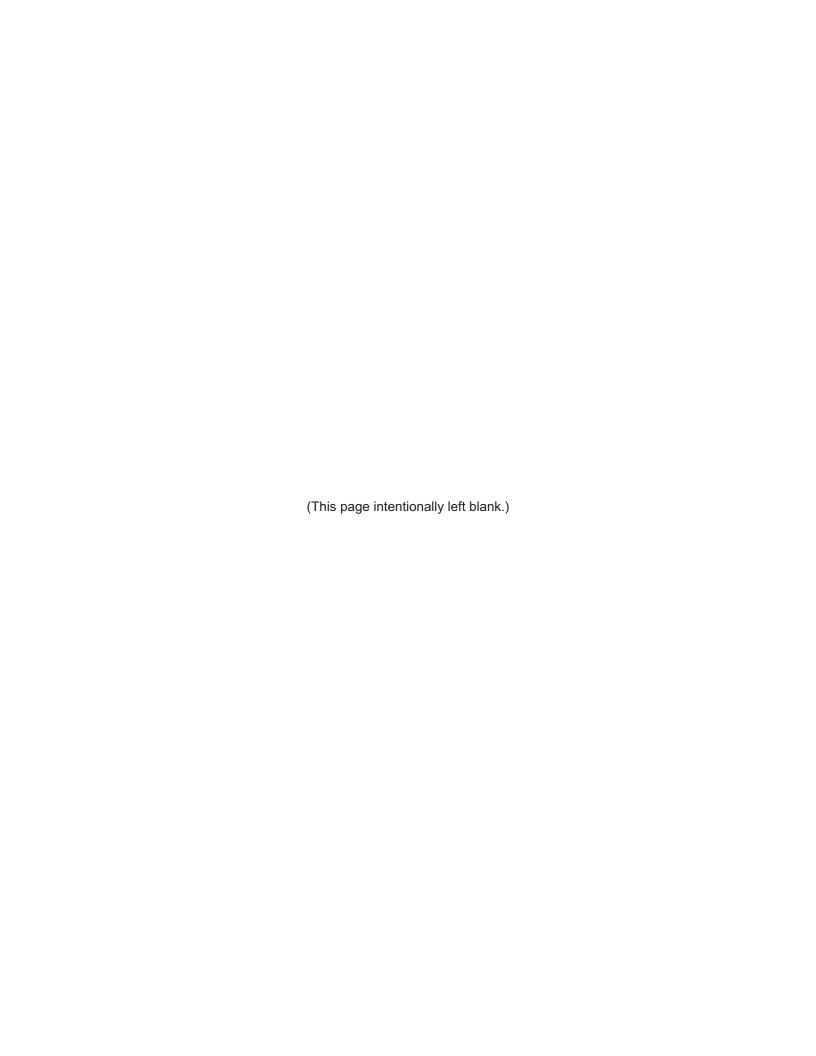




FBI Headquarters Consolidation

Appendix A: Public Scoping and Agency Correspondence



APPENDIX A: PUBLIC SCOPING AND AGENCY CORRESPONDENCE

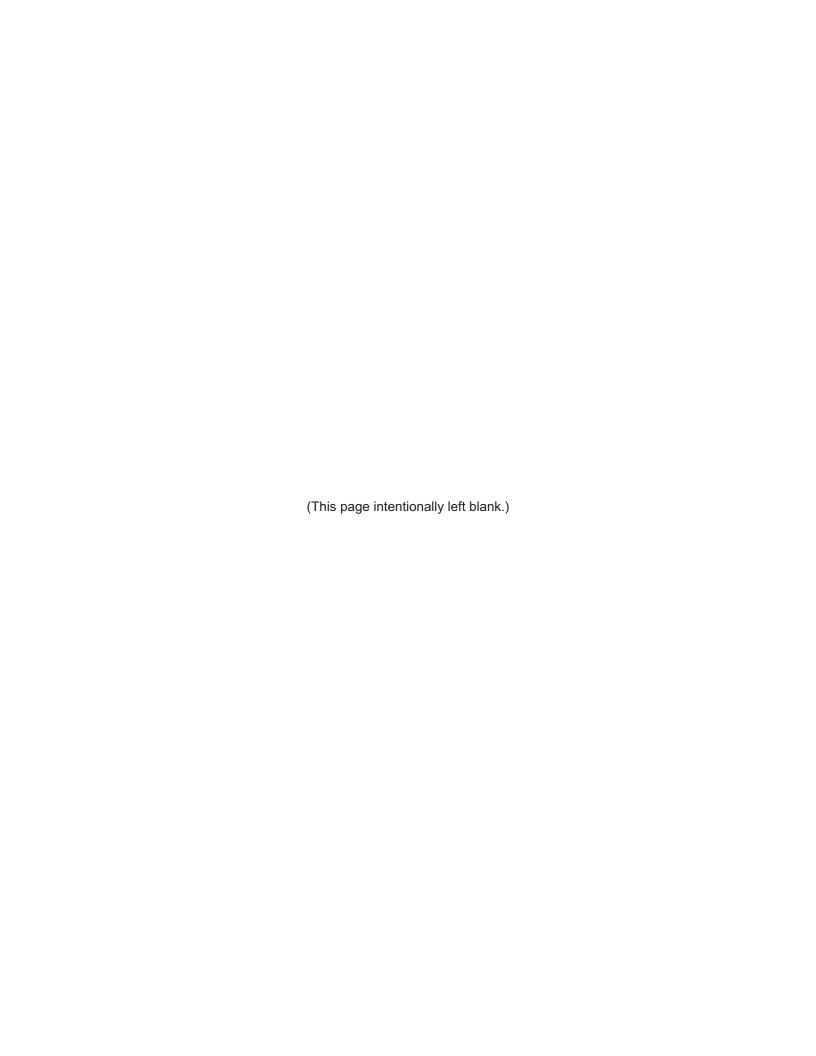


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PUBLIC SCOPING

		First and Last		
Code	Timestamp	Name	Email	Correspondence
2	9/22/2014 18:05:36	Angela Partida	ap1714@yahoo.com	1. Metro's ability to service the new transportation demands/needs to this area. Improvement of METRO BLUE LINE service, few 8 car trains as suggested, thus far. 2. What is the possible impact on local businesses, stores restaurants (recently renovated Springfield Mall). Will FBI employees bring money into this area supporting the economy of the area? 3. What about the impact of telecommuting on the need for this building project? 4. What is the projected cost for this project and will it be more useful functional than the Mark Center? 5. What is the plan for The security of this building in this area?
3				I am a strong believer that the Springfield location is the best proposed location. The location is convenient to both the Beltway and 95. More importantly it is within 1/4 mile of the Franconia Metro station. There is an existing local transit bus TAGS that serves the immediate vicintiy to take commuters to and from the Franconia Metro stop. This could be easily extended to serve the FBI HQ. The majority of the commuters from the FBI HQ on the Metro line would be commuting in reverse of the commuters utilizing this Metro station. This would work towards maximizing the efficiency of the Metro with a minimal increase in the burden. The transportation infrastructure is in place, the property is currently within the GSA possession, and there are great nearby amentities with the opening of the Springfield Town Center. This will help the surrounding community by
	9/23/2014 11:35:56	Eric Christensen	Christee@preit.com	bringing in a well paid and well educated population. Its a win-win!
4	9/23/2014 14:34:16	Daprena Boyd	daprena.boyd@ic.fbi.gov	Please do not consider FBIHQ to VA at all. This location will be an absolute nightmare for traffic and commuting purposes. The beltway in and around VA was designed for the influx of people who live there now and who have recently moved there. This location cannot possibly add more traffic to this area. It is crowded enough. A more feasible location would to remain somewhere in the District. Everyone, can and has been arriving to this location all along. And no one will be terribly uncomfortable with this decision. Thank you.
5	9/23/2014 18:03:46			I would like to be added to the 106 Consulting Party list for distribution of information. We are most interested in the outcome related to Greenbelt, but we work with local preservation organizations and would be able to distrubute information regarding mitigation strategies. Issues related to historic preservation, natural resources, or the use of artistic works from local artists are all of interest to our organization.
6				I love the idea of putting the FBI headquarters in Greenbelt! It wouldn't just be a boon to our city, it would be great for the Bureau also: the educated employee base (for the FBI or contractors), the transportation access, and the capacity to have more control over the development process than at the other sites are our strongest points. Other folks in the community might complain about environmental and transportation impact. That shouldn't take much to mitigate, and the
	9/23/2014 18:07:48	Jim Miers	jftmiers@gmail.com	benefits to our town would far outweigh the risks.
7		ю	W	I am wondering how the creek will be treated in regard to the security zone. I've seen trees go floating down the creek after a big rain. I am also opposed to 'giving' the developer the 29 acres as part of the project. It is being removed from public acess. I understand that the
	9/23/2014 18:11:21	Kurt Schneckenburger	kurt@olsonresearch.com	developer is not 'getting' the 29 acres but this deal wouldn't work if it wasn't removed from public access.

			U	18
			i.	much favor the choice of Greenbelt as a site for the FBI facility. The availability of public transit and the proximity to the Beltway make Greenbelt an ideal site for commuters. No other site would be as convenient for workers who come by transit. The federal site at which I work used to have a shuttle but it was discontinued for budgetary reasons. Disabled workers must drive in because transit is not particularly conveniently located to the federal site. Other benefits to the agency and its employees are good and affordable
8		,	*	housing, an involved and active city government, and a pool of well-educated potential workers. There is a mall and a historic district not far from the site, allowing federal workers options for lunch and for shopping and entertainment after work. In comparison, the federal site at which I work is in an unsafe and undeveloped neighborhood; the federal workers do not often venture outside of the compound, so we are isolated from the life of the community and do not benefit nearby businesses.
				As a community member, I would like to see a large-scale development such as the FBI come to Greenbelt. Greenbelt isn't overly developed, and the presence of a large employer would spur economic development in a way that would revitalize existing businesses and bring in new businesses.
				I realize there are environmental concerns, but some of the wetlands would be in the protected area. A federal agency may be the best way to save the wetlands, since the property within the secure perimeter would be protected from other development. If such land were to fall into private hands, there is no telling what might happen to the wetlands.
				In short, I believe that the FBI development would be positive for the city of Greenbelt and I believe that the Greenbelt site would offer benefits to the agency and its workers.
	9/23/2014 18:45:51	Anna Socrates	annasoc1@verizon.net	Anna D. Socrates
9				While the consolidation of FBI into a secure location is necessary and unavoidable, I believe the Bureau should consider an alternative that allows them to retain some presence across from DOJ on Pennsylvania Avenue between the capitol and White House, rather than retreat to the suburbs and remain unavailable to the public. Surely the agency could determine some of its HQ functions that do not require isolation (liaising with executive, judicial, and legislative branches comes to mind) and house those employees in the present location (maybe in an improved building). It is an important statement to make that the nation's premier law enforcement agency is accessible to the public and near DOJ, with whom it is affiliated. FBI is NOT CIA, and it should be open to public view, both legally and structurally. The choice of the Springfield site, which is already federally owned, could offset the need to give away the present building to the developer as compensation for building a new HQ. I hope GSA will consider the value of keeping a presence in DC before executing this deal and find a way to retain a public face for FBI.
	g	es .		As for the three sites, I also hope GSA will consider the environmental and cost impact of having HQ even further removed from Quantico, which houses a variety of FBI services and personnel. The need to commute FBI employees between these two existing locations, particularly during rush hour, is already costly in terms of time and federal resources. If the Bureau moves its HQ to a site in Maryland that is so removed on the beltway from VA, the existing hour to 90 minute commute between HQ and QT will more than double. It will be nightmarish and costly. The Springfield site is the only site that shortens this distance instead of lengthening it. I do not see any of that information included in the displays offered during the public comment period. Over time, this distance will result in significant cost to the taxpayer and needs to be part of the discussion from the start.
	10/1/2014 18:10:54	Sandra Grady	sjegrady@juno.com	Thanks for allowing citizens to comment and being open about this process. We need to continue that openness.

10		-4/		I certainly believe the Greenbelt location appears to be the best location. It's right adjacent to a metro station and the traffic around the metro is really acceptable. I think the traffic would be accommodated best at this location. I also like the idea of a mixed-use property right next to it that would add retail. Great site.
	10/2/2014 18:10:04	Robert Malone	rmalone@m2minc.org	My second choice for the FBI replacement building would be at Landover, MD. Great space and an opportunity to truly transform a community. Strong workforces are available from University of Maryland and Prince George's Community College for both locations.
-11	10/2/2014 18:30:26	Margaret Boles	mboles3@verizon.net	I am writing to endorse the Greenbelt site because of the ease of use of the Metro and its proximity to the site. Also, Greenbelt has a good mix of local housing and many people that live near there work at the FBI facility downtown. We have many excellent bike trails that could facilitate bike to work options, thus cutting down on the amount of cars on the roads. There are adequate roadways and adequate public safety organizations in place, i.e. fire and police. This site does have some environmental concerns, but they could easily be addressed by planning and placement just as was done at the Johnson Space Center and Kennedy Space Center to even improve on the use of nearby environmental amenities. I hope that Greenbelt will become the number one site choice because it is the best option.
12	10/2/2014 18:44:27	Greg Garland	deskofgreggarland@yaho	My preferred site for Prince George's County, is Greenbelt Metro Station. The FBI site would be adjacent to the Metro and spur economic growth around the metro station, what our county needs. Lerner Enterprises has been a disservice to Prince George's County, when it comes to Landover Mall. There are no plans in place for revitalization for mall. We as a county should support the Greenbelt site, and send a message to Lerner Enterprises, saying no to Landover Mall site. If the FBI wasn't looking for new home, the site would still remain vacant. Landover Mall has no Metro, which would add more cars to road and not remove cars. If we as a county, want smart growth we have to create smart growth development, especially around our metro stations. The Landover Mall site would be a nightmare during FedEx Field events, during the work week.
13				Landover site would be a boon to the community as well as good for the FBI employees, the site is right off the beltway, metro is close by, there is ample space to park, great shopping nearby with Costco and Wegmans, state of the art Sportsplex to name a few of the reasons to select Landover!!!
	10/2/2014 19:06:01	karen wilcher	kmwilcher@aol.com	Economically speaking it would be a shot in the arm for nearby small businesses who could provide support services.
				My preference is either site in Prince Georges County with a slight nod to the Landover site. Both locations are close to Amtrak, Metro, and Marc rail lines. Major roadways like the Capital Beltway, Route 50, and 295 allow you to easily move from Baltimore, Washington DC, and Virginia. Also, the majority of the County Government is in Largo. The Blue Line and Silver Line to Downtown DC and Tyson's Corner is very close to site as well as the Greenbelt Station. Crime is going down, education is a priority in the County and improving, the lowest home prices in the region are here, businesses are locating to the area, . there is a new Regional Hosipital being built in Largo in addition to MGM Grand Hotel, National Harbor, and the Tanger Outlets are nearby.
14				The income and education levels are some of the highest in the country and the City of Bowie was named one of the top 10 places to live in the country by Money magazine.
				One of the major comments I hear is that Prince Georges County is not diverse enough but that only takes a major attraction to occur in the County such as the FBI Headquarters to change that issue. In speaking with some of the major developers in and around the city, most speak about Montgomery County, Downtown DC, or Northern Virginia. When I asked a few developers why Prince Georges County never comes up in these discussions thay basically mention they know little to nothing about the County!! Not a very good commentary.
	10/2/2014 19:08:30	Bruce Lucas	brucelucas@bmlpropertie s.com	All in all Prince Georges County deserves a major shot in the arm. Everything is lining up to be included in development and other discussions about the region, the citizens are ready, and its time!!! Welcome to Prince Georges County.

15	10/2/2014 19:14:10	Catherine Hollingsworth	hollihamm@yahoo.com	Greenbelt seems like an ideal spot for controlling traffic because of the massive Metro station there. Landover Metro is too small, it seems, and may fill up quickly. If Greenbelt is chosen, I would hope that extra steps would be taken to keep beautiful Greenbelt "green" and teeming with wonderful wildlife.
				Will the relocation plan accomodate for and project for as much needed space as possible. Sometimes government facilities are built and when the time comes to move in there is not enough space for everyone.
16		-		It is good that the relocation plan is considering distance from metro stations. Has thought been given to having transportation from the metro station to the FBI HQ and from the FBI HQ to the metro. The metro buses are very good at getting you to the metro but once you are at the metro sometimes you have a problem reaching your destination. Will there be shuttles for Federal employes to use to get back and forth especially for lower GS level employees who depend on public transportation. These should be done and government regulations should not prevent this kind of transportation. In the suburbs, if you do not have a car, getting around can be difficult.
	10/2/2014 19:23:08	Emily Hickey	erhickey150@gmail.com	How does the FBI HQ reloaction intend to deal with the concern that Federal agencies are leaving the District for the suburbs? According to the news article, I read it appears that the Federal Government is breaching an agreement it made with the District of Columbia.
17	10/3/2014 12:22:43		ezipeto@yahoo.com	#1 The Greenbelt location would be my first choice for relocating the FBI building. The Metro location would certainly be an employee favorite. An environmental impact study to the state owned marsh area would be welcome. #2 Landover would be better served as a mixed use housing location and developed as a TNI focus area. #3 Springfield, VA would make the most fiscal sense since it is government owned but the majority of employees would have the same distance difficulties with no direct public transportation available.
18	10/7/2014 13:13:55	Lisa Witmer	lisa.witmer@outlook.com	I am concerned that the FBI is not considering any space within the District of Columbia. The FBI's current headquarters is in a great location, making it accessible to the many employees who commute from as far away as Delaware and West Virginia. In addition, keeping FBI HQ in DC will serve as a reminder of the important functions performed by the FBI to those who live/work in the District as well as the many visitors. Visibility increases accountability as well as accessibility to citizens who need to report to HQ for various functions. I strongly urge you to reconsider this choice and keep HQ in DC.
19	10/9/2014 12:46:40	Heather Schmidt	suminjia@yahoo.com	I work for the Department of Justice as an attorney and have meetings at FBI Headquarters at least once a week. When FBI Headquarters is relocated, meetings will no longer consist of a three block walk between my office and HQ, but rather, a long commute. Multiply this commute by the number of employees and calculate how much productivity will be lost because of transit time. (Or consider the increase in pollution or traffic because of the necessity to travel for meetings.) To lesson the impact that commuting will have on productivity, traffic, and pollution, you should pick the location with the easiest access to public transportation — Greenbelt.
20	10/14/2014 13:43:17		christy.berghoff@ic.fbi.go	I am concerned if the government will be offering a reloaction assistance since the FBI HQ will no longer be centerally located in DC. My daily commute would range from 90 to 120 miles one-way. How many personnel will the FBI willing loose because it will no longer be in DC? Will all off-site locations be consolidated or will some remain?
21	10/15/2014 2-46-50	bbb	amail@amail.com	Moving to any of the 3 proposed locations will result in greater costs and wasted time and resources than rebuilding in the current location. Time wasted traveling to meetings on the Hill, at DOJ, the White House, etc, and back from any of the 3 remote proposed locations will erode taxpayer value over time. The increased burden on commuting employees will exact a price in effectiveness and productivity. Any short term financial gains realized from moving will be lost in wasted time, resources, and productivity. Execution of our mission will suffer in the long term. Alternatively, a new 11+ story building could be constructed in the JEH courtyard area. Some, but not all of the current JEH employees would be displaced during construction. The existing building could eventually be razed, resulting in the required setback of the new building. Expenses for
	10/15/2014 2:46:58	bbb	email@email.com	HEST NECT 및 2014 (ACCES) 및 178-74 (ACCES) 및 2014 및 1885 및 1887 (ACCES) 및 1886 및

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22	10/15/2014 11:50:02	Patrick McNelis	patrickmcnelis@gmail.co	It seems to me that the Greenbelt location would be the more ideal location for the new FBIHQ. Certainly it would potentially give me a shorter commute, but the reason seems more general than that. Looking at the sites, Springfield is already too congested. What is the point of moving from downtown DC because of setback and crowding concerns if you're just going to plop the new facility into the middle of more congestion. The access to the Springfield site would be a nightmare for anyone but those living within a few miles. There are several schools nearby, a large shopping mall and several smaller shopping locations and business parks. The interstate highways in the vicinity (95, 495, and 395) and the VA state highways are already parking lots with traffic trying to move through the area, could you imagine upwards of 10000 people a day trying to get to FBIHQ on those same roads? The Blue Line terminated at Springfiled, and the ride from central DC to the Springfield Metro station is 30 minutes or more. Now imagine having to come from anywhere in MD. It would be impossible to get there in under an hour from anywhere in MD. My commute would increase by 35 minutes from its current 1 hour and 15 minutes. Landover would make equally bad sense, as there is no easy way there, unless you are t planning to build a private exit ramp off of 495 a la NSA. And it is too far from a Metro rail station. Additionally, on game days or days when there is an event at FedEx Field, the traffic on 495 would be a parking lot. There is also nothing there. Nothing. The neighborhoods in the immediate area are not good, and there are no real off-campus options for lunch. Greenbelt would make the best choice. There is equal concern over local retail availability as with Landover, but the site would be far easier for most people to get to. The Metro rail station is right next door, and the planned Purple line is supposed to stop there as well, giving the location two Metro rail options (whereas the other two locations only have one). Highw
23			Ŷ.	even an accident and then I spoke to some Virginians and they told me that is normal. Imagine another 11,000 people adding to the current Virginia
Trans.	10/15/2014 12:16:40	Brownie	smbrown59@aol.com	traffic problem.
53				Dear Project Director, I visited the GSA/FBI project scoping meeting held at the Prince George's County Sports and Learning Complex in Landover, MD. I am a Councilwoman in the City of Glenarden and would like to express my support for the Landover location being selected for the GSA/FBI Consolidation Project. The selection of the Landover location would elevate an area that has declined over many years. Growing up in the City of Glenarden, I frequented the Landover Mall that was located on the Landover site. It was one of the premiere indoor malls during that era. During the scoping meeting, I learned the Landover location has 80 acres of land, which is a large amount of land to build a site, in addition to future growth and expansion development. The Landover location is within 3 Metro stations: New Carrollton, Landover, and Largo for employees who would be travelling via Metro and the location has immediate access to the Route 495, Route 50, Route 704, and other local arteries and access roads. The location is also near the Woodmoore Town Center at Glenarden that has numerous stores and food shops for employees wanting to get out during lunch. The location is also near the Prince George's County Sports and Learning Complex for those employees who want to work out after visiting the numerous food shops during lunch. If the GSA/FBI selected the Landover location, I believe it would bring a much needed economic springboard to launch other development to the area surrounding my city, while making it one of the premiere security facilities buildings within the area. Thank you for allowing me the opportunity to comment on your project.
	10/23/2014 19:41:57	Deboran Eason	deason@cityofglenarden.c	Councilwoman Deborah A. Eason, City of Glenarden, MD Ward 2.

54	10/23/2014 16:39:58	Benjamin Fischler	brf57@yahoo.com	While I am supportive of mixed use development on the existing WMATA parking lot at Greenbelt Station, I am concerned about impacts to the streams, wetlands, and forested floodplains adjacent to the parking lot. The "site boundary" shown at the scoping meeting encompasses not only part of the existing parking lot but also areas of floodplain, wetland, and streambed Impacts to these areas of floodplain, wetland, and streambed must be carefully studied because so much of such land has been lost to development within the Indian Creek watershed. Of particular concern is the area shown as a "State of Maryland Security Easement" as it is not clear how this land will be treated and because this land encompasses an sensitive braided stretch of Indian Creek, As GSA defines the Area of Potential Effects it is important that it include all areas where development is required in order for the FBI campus to be built. Of particular concern here is the north-south connector road that Prince George's County is calling Greenbelt Station Parkway. The preliminary plans show this road impacting forested floodplain to the immediate southwest of the proposed FBI campus. Attention should be paid to the evidence that this area of forested floodplain was not disturbed by the extensive 20th century mining in this area, which makes it very important that 21st century development not impact this area. My concerns about these environmental impacts are primary, given the highly degraded condition of much of the Indian Creek floodplain and streambed and the relatively good condition of the Indian Creek floodplain and streambed with the FBI project site and adjacent required development areas. I do also have concerns about adequate access to the Metro station for people using public transit and for pedestrians. Careful study is needed to develop clear requirements that allow full access to the Greenbelt Metro Station while the FBI campus is under construction and once it is in use. Thank you for considering my comments. Benjamin Fischler (
55	10/22/2014 19:11:24	Bruce	bruce.waagoner@verizon.	I am writing as a property owner in central Springfield for the past 20 years. The relocation of the FBI's HQ to the GSA site presents opportunities and challenges for local residents; I look at it from a cost-benefit perspective. Greater congestion will occur, particularly at first since the Bureau's workforce is dispersed in the DC Metro area. Thats a negative development. On the positive side, over time, more employees will gravitate to the greater Springfield area as long as Commonwealth schools remain viable and attractive. More than likely, the Bureau's presence will strengthen schools given its demographic. The FBI's employee demographic is enviable. Any community would benefit if only to have them patronizing local restaurants and businesses during the work day and after hours. FBI in Springfield only reinforces infrastructure improvements made and planned to enhance the Mixing Bowl area and drives the viability of the Springfield Town Center's residential plans. In that sense, the infrastructure would already be in place for the HQ, or at least would proceed in step with the build out of HQ. In sum, I'd prefer FBI to stay in DC where it draws in personnel like a wheel hub draws in spokes. But the District foolish doesn't want this gem. In that case, Virginia should fight for it given the FBI's prestige, job and high-end development generation. Let Maryland build another casino. Let's Virginia build an economy based on Law Enforcement and strong institutions.

56				Bill Dowd Project Administrator U.S. General Service Administration 1800 F St, NW Washington, DC 20405 Dear Mr. Dowd, I am writing on behalf of the Central Maryland Transportation Alliance to provide input for the NEPA scoping process for the site selection for the Federal Bureau of Investigation (FBI) headquarters. The Central Maryland Transportation Alliance (www.cmtalliance.org) is a non-profit formed in 2007 to advocate for a thriving region served by interconnected modes of transportation. We have spent the past seven years producing feasibility studies, conducting pilot projects, and doing direct advocacy to push for transportation improvements that connect people to jobs more efficiently and reliably. We have been active members of the Opportunity Collaborative, a consortium of non-profits, institutions and government partners who are implementing a \$3.5 million grant from the U.S. Department of Housing and Urban Development to create a regional plan that addresses the stark disparities in access to opportunities between low-income residents of the Central Maryland region and others.
	10/22/2014 11:02:53	Brian O'Malley	bomalley@cmtalliance.org	Through our work we have encountered the profound impact that location
57	10/22/2014 10:29:12	Adam Samue s	samuels7995@gmail.com	Benefits to Springfield location are access to existing METRO station, I-95/495/395 Expressway, and proximity of services in the FBI employees in area (child care, mall, auto maint, etc). Also closest to Quantico. Concern: Plans for roadway/METRO Station infrastructure to accompidate the additional traffic. The level of Holiday traffic at new Springfield Town Center may be a preview of daily level of traffic if FBI staff added to existing roadway traffic and at Metro Station. Is there room on Loisdale to expand the road to accompidate this level of traffic? Additional ATFP measures needed outside a new FBI building, or surrounding area since it line-of-sight to I-95N/ Franconia Springfield Parkway/ Mall Parking Lot structure? What have threats been to FBI existing FBI HQ in DC we should expect in Springfield?
58	10/21/2014 19:21:25	Mike Torphy	mitorphy@gmail.com	To minimize overall environmental impact, the new FBI Headquarters should be located close to existing facilities with significant FBI business that will otherwise be unaffected by the consolidation project. Such facilities include the FBI Academy and the National Counterterrorism Center. The Springfield location is far better suited to this critical need.
59	10/21/2014 7:25:37	suzanne malone	flyfishqrl@aol.com	Springfield is the clear choice. Access to Quantico, route 95, Washington dc, transportation and amenities for the employees

				communities that would be affected by this project.
				As a Council member for the City of Glenarden I am thrilled to see that the FBI is considering the Landover Mall site, which is adjacent to the city in which I live. This project would be a great economic boom for the City of Glenarden and the surrounding jurisdictions. This project will attract sorely needed economic development to the inner beltway communities.
st.				I feel the Landover Mall site would make an excellent location to house the FBI headquarters. The site is bordered by the capital beltway (95,495), Landover road (rte 202), route 50 is about a mile down the beltway and route 295 is about two miles down the beltway. It seems that these main roadways gives the FBI more than just one alternative when it comes to coming and going from the site.
60				The property sits on a site that already has the infrustructure in place so that will be a great cost savings and probably reduce the timeline of the project since most sensitive issues such as wetlands, storm water management, traffic studies (etc.) have already been performed. It seems that the property would be easy to secure since it is an elevated property that you can only access from the two main access roads that are already there.
				When it comes to transporation the site is accessible by at least 3 metro stations, New Carrollton and Landover on the Orange line and Largo Town Center on the Blue line. The are three metro buses that service the property, the F14, the A12 and the A11 and one County bus, the 21 from New Carollton metro station. The Marc rail stops at New Carrollton metro as well as Trailways bus. All of the metro stations, Marc rail and Trailways are within a 1 to 2 mile radius of the site.
	10/20/2014 11:53:26 Ja	ames Herring	jherringward1@aol.com	Another plus to selecting the Landover Mall site is that it is adjacent to the Woodmore Town Center at Glenarden shopping center. A bridge is slated
61	10/15/2014 12:16:40 Bi		smbrown59@aol.com	FBI needs to move to MD because Virginia traffic is a mess. I went to Quantico on a Sunday at 3pm and sat in traffic for an hour. There wasn't even an accident and then I spoke to some Virginians and they told me that is normal. Imagine another 11,000 people adding to the current Virginia traffic problem.

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Code		First and Last Name	Email	Please submit your comment(s) below	Zip Code
				Per the Public Scoping Process for NEPA, we are submitting the following comments to GSA for consideration as part of the NEPA process. We understand that the GSA is preparing an Environmental Impact Statement to analyze the potential impacts resulting from the proposed action, which includes 1) site acquisition for a consolidated FBI HQ at a new permanent location and 2) exchange the JEH parcel. Our comments specifically relate to the first action (acquisition of a consolidated FBI HQ at a new permanent location. Our comments also relate to one site in particular; the "Landover Alternative". Below are our comments as they relate to the "Issues of Interest at the Landover Site" as described in the materials presented at the public scoping sessions: 1)"Compatibility with existing zoning and land use": the site is currently zoned MXT which allows for this use and substantially more density than being proposed 2)"Potential traffic impacts on Study Area" Please refer to the enclosed USB Flash Drive which contains a video presentation of the site that was presented to the State of Maryland and Prince Georges' County on September 23, 2014. 3)"Environmental Contamination": The site was previously a shopping mail, and there was a small component which included a Sears Auto Repair facility. That facility is in the process of being demolished, and we believe that any environmental contamination, if it currently exists, will be removed by early 2015. 4) "Impacts to Metro Service": the site has close proximity to four metro stations which serve three different metro lines, and although only one of the stations is within two miles within paved roads, each of the other stations are just over two miles and have the ability to miltigate the strain that might be caused by having only one station that services the site.	
52	21-Oct-14	Alan H. Golllieb		As mentioned above, Lerner Enterprises held an information session with several representatives from the State of Maryland and Prince George's County. In that presentation, the Lerner team outlined some of the attributes of the Landover Alternative, including: 1) Shovel-ready. The buildings can be under construction quickly since the site has no known encumbrances to development. 2) Excellent access: The site offers great transportation redundancy with 1. An existing interchange to 1.495 that may require only minor improvements and 2. Four different Metro stops on three metro lines and 3. Multiple access points to the site. 3) Flexible: The 80 acre, relatively flat, oval-shaped site would provide for a very efficient headquarters; over 20% expansion capability for future growth. 4) Sustainable: the site can provide many "green" elements, including hundreds of trees and low environmental impact. 5) Secure: The site's size and shape is excellent from a security standpoint because it provides the greatest amount of flexibility for setbacks and the ability to design a low-rise complex in a private campus setting. A video of the presentation is on the enclosed USB Flash Drive. Since the video contains several facts about the site, and the Lerner Team's analysis, we are submitting the video to GSA for consideration as part of the NEPA Scoping Public Comments process.	

Code		4		4	
	Timestamp	First and Last Name	Email	Please submit your comment(s) below	Zip Code
			Iden@	MD DNR Comments to MD State Clearinghouse, for MD20140909-0736 Re: Notice of Intent to Prepare Environmental Impact Statement for the Proposed Federal Bureau oflnvestigation (FBI) Headquarters Consolidation Attention: Bob Rosenbush, MDP Prepared by: MD DNR, Project Review Division, Integrated Policy and Review Unit, attn: Greg Golden October 17, 2014 MD Department of Natural Resources (DNR) is pleased to have the opportunity to provide scoping comments on this important project. We have natural resource information and analysis capability for the two sites within Maryland, Greenbelt and Landover. Both Maryland sites offer important opportunities for environmentally sensitive redevelopment, where new impacts to natural resources can be appropriately avoided and minimized, and beneficial activities to include stormwater retrofits, habitat restoration, and other natural resource improvements can be conducted to improve existing conditions during redevelopment. Both Maryland sites offer opportunities for environmentally sensitive design atld restoration that will benefit both the site itself, and downstream and downslope habitats and watershed reaches. For these reasons, we are very enthusiastic to play a review role in scoping and planning for the two Maryland sites. Before providing notes on each of two Maryland sites, we provide the following support and encouragement for state-of-the-art redevelopment approaches,	
89	10/1//2014	Greg Golden	nd.gov	which we understand this project will utilize. Environmentally sensitive design,	
90	10/14/2014	Beth Cole	beth.co le@ma ryland.	Thank you for your recent letter, dated September 4, 2014 and received by the Maryland Historical Trust (Trust) on September 8, 2014, 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. We understand that GSA proposes to consolidate components of the FBI Headquarters into a rentable facility (up to 2.1 million square feet) to provide secure space to meet program requirements. GSA's study will examine three site alternatives, including two located in Maryland (Greenbelt and Landover) and one in Virginia. The Trust, Maryland's State Historic Preservation Office, will be involved in the review of the project's Maryland alternatives for effects on historic properties, pursuant to Section I 06 of the National Historic Preservation Act (NI-IPA) of 1966, as amended. We look forward to working with GSA and other involved patties as planning progresses 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 amanda.apple@maryland.gov or me (for archeology) at 410-514-7631 I beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.	

Anacostia Watershed Society Chesapeake Bay Foundation Clean Water Action Coalition for Smarter Growth 1000 Friends of MD

October 21, 2014

Nia Francis, Project Manager U.S. General Services Administration, NCR 301 7th Street, SW, Room 4004 Washington, DC 20407

SUBJECT: NEPA Scoping Comments

Electronic submission: fbi-hq-consolidation@gsa.gov

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Dear Ms. Francis:

On behalf of the undersigned organizations, please accept these comments on the scoping of the Environmental Impact Statement to be prepared for a new Federal Bureau of Investigation ("FBI") headquarters. Our understanding is that the purpose of that project is to consolidate some 11,000 headquarters staff (almost half of which is now scattered around the region) in a new, secure but accessible, state-of-the-art facility.

The 200,000+ members of the undersigned organizations are keenly interested in major development and redevelopment projects, as these have the potential for helping to keep the Chesapeake Bay watershed on track to meet Chesapeake Bay Clean Water Blueprint (Total Maximum Daily Load – "TMDL") objectives; protecting and restoring local streams and rivers; and promoting sustainable patterns of growth across the Washington region. Such projects also have the potential to exacerbate current problems. We are encouraged that the FBI/GSA's development criteria for the proposed relocation and consolidation of the FBI have led to three area sites being considered that are redevelopment sites (Greenbelt Metro, MD, Landover Mall, MD, and Franconia Warehouse, VA) rather than "greenfield" sites far removed from existing urban and suburban development. At the same time, of course, not all redevelopment sites are created equal.

First, for water quality across the Chesapeake region, air pollution deposition provides a significant proportion of nitrogen pollution — about 25 percent — and in metropolitan Washington, transportations sources of this pollutant are the most prominent. When the EIS for the FBI's relocation is prepared, it is crucial that the analysis consider all the environmental impacts of transportation access to the facility by the thousands of relocated employees, for each alternative or candidate site, including: (1) the direct NOx, CO2, and CO air quality-related impacts associated both with new vehicle trips ("VT") and with vehicle miles of travel ("VMT") to/from each of the sites; (2) transit access and proximity, availability, reasonably expected usage, and overall impact; (3) traffic impacts in the immediate area of the proposed facility, as well as along access routes; and (4) size of and impacts from the construction, operation, and maintenance of any new road, parking, or potential private transit activities for access to the facility/site.

Nia Francis, Project Manager U.S. General Services Administration, NCR 301 7th Street, SW, Room 4004 Washington, DC 20407 Page 2

Second, urban/suburban stormwater runoff provides between 25-30% of nitrogen and phosphorus pollution to the rivers of the national capital region, and it is the one source among all in the Chesapeake watershed which continues to grow; the development profile and location of major development and redevelopment projects thus becomes extremely important. It is therefore critical to consider what effect development on each site will have upon **land uses and runoff pollution** currently present at each site, for example: (1) will the project reduce or increase existing imperviousness (and existing polluted runoff) on-site and if so by how much; (2) what are the plans for treating polluted stormwater runoff, and what will likely be the resulting new pollutant loads that are generated by the project as a whole? Environmental analyses should also consider any additional facilities required, or development/land use changes planned, connected to or reasonably expected to occur as a result of the FBI relocation, including any which may occur nearby or off-site.

Finally, as to existing **environmental and natural resources** that could be impacted, the EIS should of course include a thorough analysis of any reasonably expected negative impacts upon natural resources, as well as any beneficial impacts from any natural resource restoration that is either recent, planned or on-going at each site, or might reasonably be undertaken as mitigation (if necessary). Any natural resource acreage secured in conservation use should also be noted.

Again, thank you for the opportunity to provide our recommendations for the scoping and EIS development process. If you have any questions about our comments, please feel free to contact Lee Epstein at the Chesapeake Bay Foundation, 410/268-8816 or lepstein@cbf.org. We look forward to reviewing the resulting analyses.

Sincerely,

Anacostia Watershed Society

Chesapeake Bay Foundation

Clean Water Action

Coalition for Smarter Growth

1000 Friends of MD

October 23, 2014

Ms. Nia Francis OPDQ Project Manager U.S. General Services Administration National Capitol Region Room 4004 Washington, DC 20407

Re: NEPA Scoping Comments

Electronic submission: fbi-hq-concolidation@gsa.gov

Dear Ms. Francis:

Thank you for the opportunity to as part of the NEPA scoping process to comment on the potential alternatives for relocation of the FBI headquarters. Our comments will primarily focus on the Greenbelt alternative.

We would like to first express the request for an open and transparent process that lookes honestly at all of the purported alternative sites on merit and any other sites that might be suggested during this process. We request that a complete study which includes all facets of the project which will encompass the FBI HQ.

We ask that studies include the impact of air pollution; traffic impacts, stormwater runoff, size of impact from the construction, operation and maintainance of any new road parking or potential private transit activities for security or access to the facility/site. Please include the area that the state highway administration has started design work for widening the 495 Beltway to accommodate the development of the FBI HQ at this site and it should be included in the EIS study.

We would also like to note at this site that the size of the project which includes the FBI HQ encroaches on a conservation area purchased by the State of Maryland as reserved open space which would insure the protection of Indian Creek and its floodplain.

Sincerely, Vicky Hageman Chair



City of College Park 240-487-3501

www.collegeparkmd.gov

Office of the Mayor and City Council

4500 Knox Road College Park, MD 20740

Mayor

Andrew M. Fellows 5807 Bryn Mawr Road 301-441-8141

City Council

District 1

Fazlul Kabir 9817 53rd Avenue 301-659-6295

Patrick L. Wojahn 5015 Lackawanna Street 240-988-7763

District 2

P. J. Brennan 4500 Knox Road 301-220-1640

Monroe S. Dennis 8117 51st Avenue 301-474-6270

District 3

Robert W. Day 7410 Baylor Avenue 301-741-1962

Stephanie Stullich 7400 Dartmouth Avenue 301-742-4442

District 4

Alan Y. Hew 9118 Autoville Drive 240-391-8678

Denise C. Mitchell 3501 Marlbrough Way 240-475-7196 October 22, 2014

Ms. Nia Francis
OPDQ Project Manager
U.S. General Services Administration
National Capitol Region
301 7th Street, SW
Room 4004
Washington, DC 20407

Re:

NEPA Scoping Comment FBI Headquarters Consolidation

Dear Ms. Francis:

The City of College Park supports the Greenbelt alternative for the relocation of the FBI Headquarters and appreciates the opportunity to provide comments during the scoping phase of the Environmental Impact Statement (EIS) process. While the Greenbelt Station site lies within the municipal boundaries of the City of Greenbelt, the City of College Park neighborhoods of Hollywood and Sunnyside adjoin the site to the west of the rail lines.

Due to their close proximity, the City is concerned about the cumulative impacts of the project on these neighborhoods. It is important to preserve their single-family residential character. Specific concerns that have been raised include groundwater drainage, flooding caused by new development, noise and light reflection into nearby homes, air quality and the protection of environmentally-sensitive areas. The Renard Development Company, LLC has attended neighborhood meetings over the past year and is expected to continue to meet with neighborhood residents.

Transportation and traffic issues need to be fully and adequately studied during the preparation of the Draft EIS. The need for beltway access improvements including new ramps into and out of the site has the potential for significant property impacts to College Park residents. The Maryland State Highway Administration (SHA) is examining the need to widen the beltway to accommodate these ramps and the Draft EIS should encompass the same study area. The City supports the preparation of a Transportation Management Plan (TMP) that takes full advantage of an on-site Metro station and utilization of GSA incentives and subsidies to encourage ridership.

Water resources, particularly the impact on wetlands and floodplains, should be given special attention. The preservation of the Indian Creek Stream Valley Park and Narragansett Run are extremely important to the City. All impacts to water quality and quantity should be very clearly stated.

GSA Greenbelt Station EIS Scoping Letter October 22, 2014 Page 2

Aesthetics and visual resources are also important. The view of the project from College Park's low-rise neighborhoods should have an attractive appearance and all impacts resulting from building heights and materials should be measured.

Finally, the City asks that bicycle and pedestrian infrastructure in and surrounding the project area be addressed.

The City of College Park looks forward to reviewing and commenting on the Draft EIS and thanks the GSA for this comment period during the scoping process.

Sincerely,

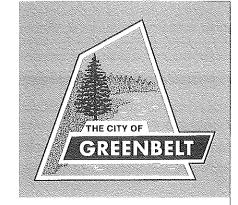
Andrew M. Fellows Jim
Andrew M. Fellows

Mayor

66

CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886



October 14, 2014

U.S. General Services Administration – NCR Public Buildings Service Office of Planning and Design Quality Attn: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, DC 20407

CITY COUNCIL

Emmett V. Jordan, Mayor Judith F. Davis, Mayor Pro Tem Konrad E. Herling Leta M. Mach Silke I. Pope Edward V.J. Putens Rodney M. Roberts

Dear Ms. Francis:

Thank you for the opportunity to provide comments for the scoping process of the FBI Facility Consolidation and Relocation Environmental Impact Statement (EIS). We understand that the EIS will analyze potential impacts of this project on three alternative sites in the Washington metropolitan area. Relocation to a new consolidated facility will have considerable benefits to the region and will impact our local community in many ways. Since the Greenbelt Metro site is located within the City of Greenbelt limits, we appreciate the opportunity to help determine issues to be studied and addressed through the EIS.

We believe there are many positive outcomes that would result from relocation of the FBI facilities to the Greenbelt Metro site for our community, the region, and for FBI employees. This site is adjacent to the Greenbelt Metro station and other robust regional transportation infrastructure. As the EIS studies transportation, traffic and parking impacts, we hope it will evaluate the benefits unique to the Greenbelt site, including but not limited to, reduced employee traveling time to the site, the improved balance of reverse commutes on Metro, the benefits of the site being walkable from the Metro station and its close proximity to mixed use development amenities. The City believes these benefits cannot be overlooked and are just some of the reasons why Greenbelt is the ideal site for the new FBI headquarters.

Greenbelt is a strong advocate for projects that positively impact the natural environment. Currently, the Greenbelt Metro site has 40 acres of impervious surface parking generating untreated stormwater runoff into Indian Creek. Redeveloping this site to serve as the new FBI HQ will change this dynamic by incorporating state of the art stormwater measures and low impact development. We encourage the General Services Administration to consider how best practice environmental site design may not only impact but improve the environmental conditions of the site and nearby stream valley.

U.S. General Services Administration – NCR Office of Planning and Design Quality Attn: Nia Francis, Project Manager October 14, 2014 Page 2 of 2

The City is supportive of the issues that the EIS will analyze and believes there are additional issues that should be considered, including the following:

- The Council would like the EIS to study and provide impact analysis on elements of site design that may be associated with Level V security standards. In particular, we are interested in impacts associated with fencing, gates and roads in the wetland areas of the site and potential mitigation of impacts for such facilities.
- At the scoping meeting held on September 23, 2014, many of the graphics appeared to represent outdated delineations of floodplains and wetland areas. We recommend the EIS study process reflect and utilize current updates or changes to these features of the Greenbelt Metro site.
- As the EIS develops comparisons of no build and build scenarios, we also encourage the General Service Administration to include impact analysis for the total timeframe of construction, including recycling of debris and use of sustainable building materials.

On behalf of the City Council, I want to thank you again for this opportunity to comment and to reiterate that the city would like to be included in all upcoming process opportunities.

Sincerely,

Emmett V. Jordan

Mayor

/jb

cc: City Council

Honorable Barbara Mikulski

Honorable Benjamin Cardin

Honorable Steny Hoyer

Honorable Rushern Baker

Honorable Ingrid Turner

David Iannucci, Assistant Deputy Chief Administrative Officer,

Economic Development and Public Infrastructure

Garth Beall, Attorney, McNamee Hosea

Michael McLaughlin, City Manager

Celia Craze, Director, Planning & Community Development

Coalition for Smarter Growth

DC • MD • VA

October 30, 2014

Nia Francis, Project Manager U.S. General Services Administration, NCR 301 7th Street, SW, Room 4004 Washington, DC 20407

SUBJECT: NEPA Comments

Electronic submission: fbi-hq-consolidation@gsa.gov

Dear Ms. Francis:

The Coalition for Smarter Growth submitted joint scoping comments on October 21, 2014 in conjunction with the Chesapeake Bay Foundation, 1000 Friends of Maryland, Anacostia Watershed Society and Clean Water Action regarding the proposed consolidation of the Federal Bureau of Investigation (FBI). We incorporate those comments by reference here, and while we realize we are past your October 23rd deadline, we wish to share the following additional comments related to our long-standing support for transit-oriented development as the most sustainable and transportation-efficient way for our region to grow. Transit-oriented development is a regional priority as expressed in the Metropolitan Washington Council of Governments' compact known as *Region Forward*, and supporting documents including their *Activity Centers* and *Regional Transportation Priorities Plan*.

Accessibility to Metrorail should be a high priority in the government's analysis due to direct benefits to the Federal government and the region in providing increased transportation options for workers, reduced parking costs and traffic impacts, reduced air, water and climate pollution, and greater utilization of the federal government's multi-billion dollar investment in Metrorail. If the FBI is to be located outside of the District of Columbia, locating the agency at a Metrorail station will ensure it remains closely connected with other federal agencies in the District, while also increasing the efficiency of the Metrorail system by utilizing the excess capacity available in the reverse commute direction.

A transit-oriented FBI headquarters, particularly when located within one-quarter mile of a Metro station entrance, offers the potential for significant associated mixed-use development in a walkable environment and local economic benefits from services and retail provided to the large number of employees walking to and from the Metro station. These services and retail would also provide a more convenient and attractive workplace for the agency, helping it recruit and retain quality employees, particularly in view of the growing demand for vibrant, urban environments from the next generation workforce.

Regarding the two potential Maryland sites, the Greenbelt Metro site has many advantages over the Landover Mall site given quick walk access to the Metrorail station, along with MARC and bus connections to the DC region, BWI and Baltimore. The Landover Mall site is isolated and would not

allow for any walk access to Metrorail, which is 1.5 miles away. Direct access to high-capacity transit at Greenbelt Metro will provide good transportation redundancy, improve access for workers and visitors, and help to reduce traffic and pollution. Compared to the isolated Landover Mall campus, mixed-use redevelopment of Greenbelt Metro in conjunction with the FBI will be supported by a larger market of people who are living and working in the area and using the transit facilities.

The wetlands, streams and parkland preserved at Greenbelt Metro offer an excellent security buffer, an amenity, and an opportunity for environmental restoration through redevelopment of the impervious parking lot at the Metro using modern stormwater management techniques. This combination of on-site environmental restoration, along with the reduced vehicle miles traveled, CO2, ozone and particulate pollution, will provide significant net environmental benefits over the Landover site.

Regarding the two Metrorail sites of Greenbelt and Springfield, both are preferred over a non-Metrorail site, and in weighing the two sites, the agency should consider walking proximity to the Metrorail station, opportunity for associated mixed-use development, current residential locations of employees, regional jobs/housing imbalances, and reverse commute capacity of Metrorail among other issues. COG's *Region Forward* compact identifies addressing the region's east-west economic divide -- first identified in the 1999 Brookings Institution report *A Region Divided* -- as a significant priority for enhancing long-term regional prosperity and addressing traffic, and should be considered in the evaluation. Regarding the Landover Mall site, redevelopment of this site is a goal we share, but we believe that a major federal employer like the FBI must be located at a Metro station to provide the greatest net benefits for the agency, its employees, and the region as a whole.

Thank you for consideration of our comments.

Sincerely,

Stewart Schwartz
Executive Director

Sturt Whomas

The Committee of 100 on the Federal City





Founded 1923

Chair

Nancy J. MacWood

Vice-Chair Monte Edwards

Secretary Meg Maguire

Treasurer Carol F. Aten

Trustees

Judy Chesser **Dorothy Douglas** Bobbie Faul-Zeitler Alma Gates

Stephen Hansen Erik Hein Kathy Henderson Cornish Hitchcock George Idelson Laura M. Richards, Esq. Marilyn J. Simon Frank Vespe Bill Wright Evelyn Wrin

945 G Street, N.W. Washington, D.C. 20001 202.681.0225 info@committeeof100.net October 22, 2014

U.S. General Services Administration – NCR

Public Buildings Service

Office of Planning and Design Quality Attention: Nia Francis, Project Manager

301 7th Street, SW, Room 4004

Washington, DC 20407

SUBJECT: NEPA Scoping Comment

Dear Ms. Francis:

This letter responds to the General Service Administration's request for scoping comments on the proposed Environmental Impact Statement and the Section 106 review under the Historic Preservation Act regarding the acquisition of a consolidated FBI Headquarters at a new location and the exchange of the existing J. Edgar Hoover-FBI Headquarters Building (JEH-FBI) parcel. Our principal concerns are with regard to the future of the JEH-FBI site and how future redevelopment of that site can enhance the vitality of Pennsylvania Avenue.

The Committee of 100 on the Federal City (Committee of 100), founded in 1923, is the District of Columbia's oldest citizen planning organization. The Committee of 100 has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning and design work of the McMillan Commission (1901-02). Both of these plans have been important in shaping the "Monumental Core" of Washington, D.C. Pennsylvania Avenue between the Capitol and the White House is a key element of the L'Enfant Plan and the Monumental Core and adjacent areas.

The proposed exchange of the JEH-FBI site is not just the transfer of any piece of valuable property in downtown Washington, DC. It is a large site with a block long frontage on arguably the most important street in the United States. Sometimes called the "Main Street of America", it is the place of Presidential Inaugural Parades and many other national and local events. It was also recently

U.S. General Services Administration – NCR October 22, 2014 Page Two

designated by the American Planning Association as one of the great places in America. Pennsylvania Avenue is truly a national street recognized across the nation and around the world.

In addition to its historic and ceremonial role, Pennsylvania Avenue has long been seen as a "bridge" between Downtown to the north and the Federal Triangle and National Mall to the south. This role is even more important now and in the future in view of the continued revitalization of Downtown and new attractions and improvement on the National Mall and nearby. Redevelopment of the FBI building site, with good design and an appropriate mix of uses, is a key step in achieving a more active Pennsylvania Avenue in the future.

Obviously, redevelopment is some years into the future. However, it is important not to limit the future redevelopment of the JEH-FBI site by short-sighted and limited decisions that focus more on a new FBI campus and less on the future of the current headquarters site. Accordingly, EIS alternatives and any redevelopment stipulations must include the ability to respond to changes and new plans such as the Pennsylvania Avenue Initiative recently begun by the National Capital Planning Commission, the General Services Administration and the National Park Service. Nevertheless, all of the proposed alternatives and stipulations on the transfer of the JEH-FBI site to a developer should be formulated to enhance the future of the avenue and be consistent with the Pennsylvania Avenue Initiative.

This cannot be simply an attempt to maximize the financial return to the Federal government. The Federal government has been involved in revitalizing Pennsylvania Avenue for over fifty years; GSA as a Federal agency has a responsibility to ensure that the future use of the JEH-FBI Headquarters site meets the highest standards for design and uses as befitting the most significant street in this country. This opportunity should not be wasted.

We look forward to engaging in future public consultation opportunities, commenting on the draft environmental impact statement, and participating in the Section 106 review process.

Sincerely,

Nancy MacWood

Chair

Molly Joseph Ward Secretary of Natural Resources

Clyde E. Cristman Director



Joe Elton Deputy Director of Operations

Rochelle Altholz Deputy Director of Administration and Finance

COMMONWEALTH of VIRGINIA

DEPARTMENT OF CONSERVATION AND RECREATION

600 East Main Street, 24th Floor Richmond, Virginia 23219 (804)786-6124

October 17, 2014

U.S. General Services Administration – NCR Public Buildings Service Office of planning and Design Quality Attn: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, DC 20407

Re: Scoping Notice for Proposed FBI Headquarters Consolidation - Springfield Site

Dear Ms. Francis:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources within two miles of the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from http://vafwis.org/fwis/ or contact Gladys Cason (804-367-0909 or Gladys.Cason@dgif.virginia.gov).

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,

Alli Baird, LA, ASLA

Coastal Zone Locality Liaison



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

September 16, 2014

David K. Paylor Director

(804) 698-4000 1-800-592-5482

U.S. General Services Administration – NCR Public Buildings Service Office of Planning and Design Quality Attn: Ms. Nia Francis, Project Manager, Room 4004 301 7th Street, S.W. Washington, D.C. 20407

RE: Proposed FBI Headquarters Consolidation and Exchange of Hoover Building, Notice of Intent to Prepare an Environmental Impact Statement

Dear Ms. Francis:

Molly Joseph Ward

Secretary of Natural Resources

This letter responds to the letter from Darren Blue, dated September 4, 2014, addressed to the Virginia Department of Environmental Quality's Northern Regional Office in Woodbridge, Virginia. Accompanying that letter was a draft notice for the Federal Register indicating the intent of the General Services Administration ("GSA") to prepare an Environmental Impact Statement ("EIS") concerning acquisition of a consolidated Federal Bureau of Investigation ("FBI") headquarters at a new permanent location and the exchange of the J. Edgar Hoover Building ("Hoover Building").

The Virginia Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act for projects and activities affecting Virginia, and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating Virginia's review of federal consistency determinations, prepared pursuant to the Coastal Zone Management Act, affecting Virginia's coastal uses and coastal resources and responding as above.

DESCRIPTION OF PROPOSED ACTION

According to the draft notice for the <u>Federal Register</u> ("Draft Notice"), the proposed action involves acquisition of a consolidated FBI headquarters building at a new permanent location and the exchange of the Hoover Building, as indicated above. The purpose is to consolidate existing FBI headquarters offices and divisions into one location in the greater Washington area, and to provide the FBI with a headquarters

building that meets security standards for agencies with mission functions critical to national security or continuation of government. The existing Hoover Building, situated in Washington, currently houses only 52 percent of headquarters staff; the consolidation is needed to eliminate redundancies and provide for significant space savings (Draft Notice, pages 3-4).

The new FBI headquarters would be built by a developer, on one of three acceptable sites identified by the GSA and the FBI. Following construction of the new buildings and acceptance by GSA, title to the Hoover Building would be transferred to the developer to offset the cost of the new headquarters (Draft Notice, page 5). GSA and the FBI announced three alternative sites on July 29, 2014; two of these are in Maryland suburbs of Washington, while the third is at the GSA Franconia Warehouse Complex, along Loisdale Road in Springfield, Fairfax County, Virginia (Draft Notice, pages 5-6). Our focus in this response to Mr. Blue's letter and the Draft Notice is upon the Springfield, Virginia alternative site.

ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT

The roles of DEQ in relation to the proposed project are as follows. First, DEQ's Office of Environmental Impact Review (OEIR) will coordinate Virginia's review of the Draft and Final EISs and comment to GSA on behalf of the Commonwealth. A similar review process will pertain to the Federal Consistency Determination (FCD) (see "Federal Consistency..." heading, below). If the FCD is provided as part of the Final EIS, there can be a common review.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities affecting Virginia's coastal resources or coastal uses must be consistent with the Virginia Coastal Zone Management Program (VCP) (see section 307(c)(1) of the Act and the Federal Consistency Regulations, 15 CFR Part 930, subparts A through C). GSA must provide a consistency determination which includes an analysis of the proposed activities in light of the enforceable policies of the VCP (first enclosure) and a commitment to comply with the enforceable policies. In addition, we invite your attention to the advisory policies of the VCP (second enclosure). As indicated, the FCD may be provided as part of the EIS or separately, depending on GSA's preference. We recommend, in the interests of an effective review, that the FCD be provided with the Final EIS document and that at least 60 days be allowed for review, in keeping with the Federal Consistency Regulations (see section 930.41(a)). Section 930.39 of the Federal Consistency Regulations, and Virginia's Federal Consistency Information Package (available at

http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistency Reviews.aspx) present the requirements for the FCD.

PROJECT SCOPING AND AGENCY INVOLVEMENT

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Accordingly, we are sharing our response to the letter with selected state and local Virginia agencies which have responsibilities bearing on the riature and scope of the proposed project. These are likely to include the following (note: starred (*) agencies administer one or more of the enforceable policies of the VCP):

Department of Environmental Quality:

- Office of Environmental Impact Review
- Northern Regional Office*
- Division of Air Program Coordination*
- Division of Water Programs, Office of Stormwater Management*
- Division of Land Protection and Revitalization (formerly Waste Division)

Department of Conservation and Recreation

Department of Health

- Bureau of Shellfish Sanitation*
- Office of Drinking Water

Department of Game and Inland Fisheries*
Virginia Marine Resources Commission*
Department of Forestry
Department of Historic Resources
Department of Transportation
Northern Virginia Regional Commission
Fairfax County.

In order to ensure an effective coordinated review of the EIS and the FCD, we will require 18 copies of the EA and FCD when they are published. The submission may include 3 hard copies and 15 CDs or 3 hard copies and an electronic copy available for download at a website, file transfer protocol (ftp) site or the VITAShare file transfer system (https://vitashare.vita.virginia.gov). The document should include a U.S. Geological Survey topographic map as part of its information. We recommend, as well, that project details unfamiliar to people outside GSA be adequately described.

DATABASE LIST

Below is a list of databases that may assist GSA in the preparation of the EIS:

DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource

Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory

- www.deg.virginia.gov/ConnectWithDEQ/VEGIS.aspx
- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data

- o http://128.172.160.131/gems2/
- DEQ Permit Expert

Helps determine if a DEQ permit is necessary

- o www.deg.virginia.gov/permitexpert/
- DHR Data Sharing System

Survey records in the DHR inventory

- o www.dhr.virginia.gov/archives/data sharing sys.htm
- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions

- www.dcr.virginia.gov/natural heritage/dbsearchtool.shtml
- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources

- o http://vafwis.org/fwis/
- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)
 Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL

- www.epa.gov/superfund/sites/cursites/index.htm
- EPA RCRAInfo Search

Information on hazardous waste facilities

www.epa.gov/enviro/facts/rcrainfo/search.html

EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports

- o www.epa.gov/enviro/index.html
- EPA NEPAssist Database

Facilitates the environmental review process and project planning

o http://nepaassisttool.epa.gov/nepassist/entry.aspx

If you have questions about the environmental review process or the federal consistency review process, please feel free to call me (telephone (804) 698-4325 or e-mail ellie.irons@deq.virginia.gov) or John Fisher of this Office (telephone (804) 698-4339 or e-mail john.fisher@deq.virginia.gov).

I hope this information is helpful to you.

Sincerely,

Ellie L. Irons, Program Manager Environmental Impact Review

Attachments

ec: Daniel Burstein, DEQ-NRO Kotur S. Narasimhan, DEQ-DAPC G. Stephen Coe, DEQ-DLPR Daniel Moore, DEQ-OSM Larry Gavan, DEQ-OSM Shantelle Nicholson, DEQ-OSM Roberta Rhur, DCR Amy M. Ewing, DGIF Barry Matthews, VDH Roger W. Kirchen, DHR Tony Watkinson, VMRC Gregory Evans, DOF Alfred Ray, VDOT Elizabeth Jordan, VDOT G. Mark Gibb, NVRC Marianne R. Gardner, Fairfax County Pamela Nee, Fairfax County



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
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www.deq.virginia.gov

David K. Paylor Director

(804) 698-4020 1-800-592-5482

Attachment 1

Molly Joseph Ward

Secretary of Natural Resources

Enforceable Regulatory Programs comprising Virginia's Coastal Zone Management Program (VCP)

a. <u>Fisheries Management</u> - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC) (Virginia Code §28.2-200 to §28.2-713) and the Department of Game and Inland Fisheries (DGIF) (Virginia Code §29.1-100 to §29.1-570).

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities (Virginia Code §3.2-3904 and 3.2-3935 to §3.2-3937).

- b. <u>Subaqueous Lands Management</u> The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Virginia Marine Resources Commission (VMRC) (Virginia Code §28.2-1200 to §28.2-1213).
- c. <u>Wetlands Management</u> The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.
 - The tidal wetlands program is administered by VMRC (Virginia Code §28.2-1301 through §28.2-1320).
 - (2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands - both tidal and non-tidal - (Virginia Code §62.1-44.15:5) and Water Quality Certification pursuant to Section 401 of the Clean Water Act.

Attachment 1 continued

Page 2

- d. <u>Dunes Management</u> Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by VMRC (Virginia Code §28.2-1400 through §28.2-1420).
- e. <u>Non-point Source Pollution Control</u> (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by DEQ (Virginia Code §62.1-44.15:51 *et seq.*).
 - (2) Coastal Lands Management is a state-local cooperative program administered by DEQ's Water Division and 84 localities in Tidewater (see i) Virginia (Virginia Code §62.1-44.15:67 62.1-44.15:79 and Virginia Administrative Code 9 VAC 25-830-10 *et seg.*).
- f. <u>Point Source Pollution Control</u> The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of:
 - (1) The National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to Section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.
 - (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ (Virginia Code §62.1-44.15:5) and Water Quality Certification pursuant to Section 401 of the Clean Water Act.
- g. <u>Shoreline Sanitation</u> The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (VDH) (Virginia Code §32.1-164 through §32.1-165).
- h. <u>Air Pollution Control</u> The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (DEQ) (Virginia Code §10-1.1300 through §10.1-1320).
- i. <u>Coastal Lands Management</u> A state-local cooperative program administered by DEQ's Water Division and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act (Virginia Code §62.1-44.15:67 62.1-44.15:79) and Chesapeake Bay Preservation Area Designation and Management Regulations (Virginia Administrative Code 9 VAC 25-830-10 *et seq.*).



COMMONWEALTH of VIRGINIA

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Attachment 2

Molly Joseph Ward

Secretary of Natural Resources

Advisory Policies for Geographic Areas of Particular Concern

- Coastal Natural Resource Areas These areas are vital to estuarine and marine a. ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:
 - a) Wetlands
 - b) Aquatic Spawning, Nursery, and Feeding Grounds
 - Coastal Primary Sand Dunes C)
 - d) Barrier Islands
 - Significant Wildlife Habitat Areas e)
 - Public Recreation Areas f)
 - Sand and Gravel Resources g)
 - Underwater Historic Sites.
- Coastal Natural Hazard Areas This policy covers areas vulnerable to continuing b. and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:
 - Highly Erodible Areas
 - ii) Coastal High Hazard Areas, including flood plains.
- Waterfront Development Areas These areas are vital to the Commonwealth C. because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:
 - i) Commercial Ports
 - ii) Commercial Fishing Piers
 - iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCP is encouraged.

Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCP recognizes two broad classes of priority uses for waterfront development APC:

i) water access dependent activities;

ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

Advisory Policies for Shorefront Access Planning and Protection

- a. <u>Virginia Public Beaches</u> Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.
- b. <u>Virginia Outdoors Plan</u> Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.
- c. Parks, Natural Areas, and Wildlife Management Areas Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.
- d. <u>Waterfront Recreational Land Acquisition</u> It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.
- e. <u>Waterfront Recreational Facilities</u> This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.
- f. Waterfront Historic Properties The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.

Molly Joseph Ward Secretary of Natural Resources David K. Paylor Director

(804) 698-4000 1-800-592-5482

MEMORANDUM

TO: Nia Francis, Project Manager, Office of Planning and Design Quality, GSA

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: September 29, 2014

SUBJECT: FBI: Proposed Headquarters Consolidation—Springfield, Virginia

We have reviewed the scoping letter for the above-referenced project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations):

The proposed project lists three potential sites for development: Greenbelt Maryland, Landover Maryland and Springfield Virginia. Of these three only the Springfield Virginia site would require compliance with the *Chesapeake Bay Preservation Act* and the Regulations.

In Fairfax County, the areas protected by the Chesapeake Bay Preservation Act, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. RMAs, which require less stringent performance criteria, include those areas of the County not included in the RPAs.

Under the Federal Consistency Regulations of the *Coastal Zone Management Act of 1972*, federal actions in Virginia must be conducted in a manner "consistent to the maximum extent practicable" with the enforceable policies of the Virginia Coastal Zone Management Program. Those enforceable policies are administered through the Chesapeake Bay Preservation Act and Regulations. Federal actions on installations located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands analogous to locally designated RPAs and RMAs, as provided in §9VAC25-830-130 and 140 of the Regulations.

If the Springfield site is selected over the two Maryland sites, the proposed project would impact lands analogous to locally-designated RMA lands. Projects on lands analogous to local RMA lands must minimize land disturbance, retain existing vegetation and minimize impervious cover. For land disturbances over 2,500 square feet, the project must comply with the requirements of the *Virginia Erosion and Sediment Control Handbook*, Third Edition. 1992. Additionally, stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations* shall be satisfied. All land disturbance, clearing, grading or filling related to the activity proposed within RMAs and RPAs must comply with the *Chesapeake Bay Preservation Act* and Regulations. If site development were to impact RPA lands, the project would need to adhere to 9VAC25-830-140 of the Regulations which governs development criteria for RPA lands.



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward Secretary of Natural Resources 2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan Director Tel: (804) 367-2323 Fax: (804) 367-2391 www.dhr.virginia.gov

October 7, 2014

U.S. General Services Administration - NCR Public Buildings Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street SW, Room 4004 Washington, D.C. 20427

Re: Section 106 Compliance for FBI Headquarters Consolidation

Virginia

DHR File No. 2014-1093

Dear Ms. Francis.

On September 8, 2014, the Virginia Department of Historic Resources (DHR) received information pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We understand that the General Services Administration is preparing an EIS for the consolidation of the FBI Headquarters and exchange of the J. Edgar Hoover Building parcel. From your letter, we also understand that GSA intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process

It is our opinion that this undertaking has the potential to impact historic properties. We request that GSA continue to consult with DHR as the project progresses. Should you have additional questions, please contact me at (804) 482-6084, or via email at andrea.kampinen@dhr.virginia.gov.

Sincerely,

Andrea Kampinen

Andrea Kampinen

Architectural Historian, Office of Review and Compliance



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

CHARLES A. KILPATRICK, P.E. COMMISSIONER

4975 Alliance Drive Fairfax, VA 22030

October 21, 2014

General Services Administration Attention: Ms. Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, D.C. 20407

Subject: NEPA scoping comment – Proposed FBI Headquarters Consolidation

Dear Ms. Francis:

This letter responds to the General Services Administration ("GSA") notice of intent to prepare an Environmental Impact Statement ("EIS") for the proposed Federal Bureau of Investigation ("FBI") Headquarters consolidation at a permanent location and the exchange of the J. Edgar Hoover Building. The Virginia Department of Transportation, Northern Virginia District Office (Environmental, Traffic Engineering, Land Development and Transportation Planning Sections) reviewed the subject notice and the comments provided by VDOT staff have been consolidated in this letter for convenience:

- The NEPA process and preparation is not under the purview of the FHWA and the Virginia DEQ has the responsibility for coordinating Virginia's review of NEPA documents prepared by other federal agencies and providing a response on behalf of the Commonwealth.
- Since VDOT is not a environmental regulatory agency, scoping comments
 provided by VDOT are primarily focused how the action affects negatively and
 positively the existing and planned transportation network around the GSA
 Franconia Warehouse Complex.
- The study should focus on the impact to the transportation system not only by the consolidation and relocation of FBI Headquarters staff at this location but also effects of supporting consultant firms/vendor services that may also relocate in the general area as well as visitors to the facility.
- Mitigating highway/transit improvements needed at this site should be considered as connected actions as defined in 40 CFR Section 1508.25(a)(1).

- With respect to I-95, any changes in limited access control would be subject to not only FHWA approval but also subject to CTB approval under Virginia Administrative Code. One of the requirements for CTB approval is an environmental analysis; if the approved FEIS included evaluation of proposed limited access changes, it would suffice for CTB action.
- With respect to travel demand forecasts to assess the impacts to the surrounding roadway network, the latest land use data and tools for travel forecasting should be used.
- The EIS should include an aggressive Transportation Demand Management Plan to take advantage of multimodal facilities available in the vicinity of the site such as the Metro rail service, VRE commuter rail service and bus service available at the Franconia Springfield Metro Centre, which is within a quarter mile of the site, HOV lanes on I-95 and the available bike and pedestrian infrastructure in the area.

I hope this information is helpful to you.

Sincerely,

Norman Whitaker, AICP

Transportation Planning Director,

VDOT, Northern Virginia District

cc: Ms. Helen Cuervo, P.E., VDOT

Ms. Rene'e Hamilton, VDOT

Ms. Maria Sinner, VDOT

Mr. John Fisher, DEQ

Mr. Jim Cromwell, VDOT

Mr. Alfred Ray, VDOT

Ms. Elizabeth Jordan, VDOT

Ms. Lauren Mollerup, VDOT

Mr. Hari Sripathi, VDOT

Mr. John Muse, VDOT

Mr. Paul Kraucunus, VDOT



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

October 23, 2014

U.S. General Services Administration – NCR Public Building Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, D.C. 20407

Dear Ms. Francis:

The potential relocation of the consolidated Federal Bureau of Investigation (FBI) Headquarters to the General Services Administration (GSA)-Parr Warehouse in Springfield, VA presents an exciting opportunity for Fairfax County, and the county welcomes the ability to participate in the scoping of the Environmental Impact Statement and the Section 106 process for the relocation. Fairfax County is considered an economic anchor for the region with 25% of the metro area's office space and 15% of the regional population with 1.13 million residents. The county is the second largest suburban office market in the United States with 114 million square feet of office space and is the fifth wealthiest county in the United States according to Forbes' 2014 list of the richest counties. The 2012 median household income is approximately \$107,000, and the county's unemployment rate is 3.6% as of December 2013.

The county offers a strong economy with access to the Washington-Dulles International and Reagan National airports and highly rated public schools and parks and recreational services. Seventy-four percent of the county high-school graduates enroll in post-secondary education, and the county school system is nationally recognized as an Advanced Placement Achievement District. Twenty higher educational institutions are located within the county. The Fairfax County Park Authority won the 2010 National Gold Medal Award for Excellence and since 2008 is one of 116 jurisdictions nationally accredited by the Commission for Accreditation of Park and Recreation Agencies (CAPRA).

The county envisions its continued success centered around growth and development in activity centers, one of which is the location of the GSA-Parr Warehouse site. In the Comprehensive Plan, redevelopment of the warehouse site is part of the vibrant, multi-modal, mixed-use center destination called the Franconia-Springfield Area, an area that provides essential and luxury goods and services to the local community and the region. The county, the Commonwealth of Virginia, and private development have made robust investments in the area in furtherance of this vision.

As part of the vision, the Franconia-Springfield Area offers a strategic location with multi-modal transportation options providing local and regional access. The Joe Alexander/Franconia-Springfield

U.S. General Services Administration – NCR Public Building Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager Page 2 of 3

Transportation Center, located less than a ½ mile walking distance from the Parr warehouse offers a diversity of transit options, including the Franconia-Springfield Metrorail Station, a Virginia Railway Express (VRE) commuter rail station, approximately 5,000 parking spaces, and local, regional, and intercity bus services. The Springfield Multi-Use Community Transportation Hub is planned on the west side of Interstate 95 (I-95) along Old Keene Mill Road, which will support an areawide circulator service and enhanced commuter facilities. Currently, there is a commuter parking facility and carpool lines at the location.

In addition, investment in the regional and local roadway network ensures excellent connectivity through the area. The I-95 Express Lanes, scheduled to open in December 2014, run from Garrisonville Road in Stafford County to Edsall Road in Fairfax County. Access to Springfield is available at the Franconia-Springfield Parkway, which includes interchange improvements, and a new access ramp at Alban Road. Further, the I-95 Express Lanes will connect directly to the Interstate 495 Capital Beltway Express Lanes. Commuter lots are being expanded along the corridor to further enhance carpooling availability.

Examples of improvements to local facilities include the Franconia-Springfield Parkway, providing east-west connectivity through the area, and the proposed extension of Frontier Drive from its current southern terminus at the Joe Alexander/ Franconia-Springfield Transportation Center to Loisdale Road. The new roadway will extend through the Springfield Industrial Park enhancing access to the Parr warehouse site and improve traffic flow in the Springfield area. Seventy five percent funding for the extension is currently included in the County's Transportation Priority Plan for Fiscal Years (FYs) 2015-2020, with full funding anticipated. Additionally, the schedule and funding can be adjusted, if the Parr warehouse site is selected for the FBI Headquarters.

Other local transportation projects in the area include construction of Jeff Todd Way, between Route 1 and Telegraph Road which opened to traffic in August 2014; widening of Telegraph Road, between Beulah Street and Leaf Road which was included in the Jeff Todd Way project and is open to traffic; and widening of Telegraph Road from South Van Dorn Street to South Kings Highway with completion anticipated in late October 2014. Additional highway improvements have been funded, or are being planned, such as Rolling Road from Old Keene Mill Rd to Hunter Village Drive and the Cinder Bed Road Bikeway.

The Franconia-Springfield Area has grown continuously over the past decade with new office buildings, hotels, retail uses, and housing. This development is benefiting from the accessibility to major roadways and mass-transit in the Franconia-Springfield Area. The recently renovated Springfield Town Center to the north of the warehouse site contains approximately 1.8 million square feet of retail stores, including a new food court and movie theater, and will ultimately build out into a mixed-use development containing approximately 5.7 million square feet of residential, office, retail, and hotel uses providing support services to the area. Twelve hotels, three of which were recently constructed, offer approximately 2,100 rooms to the area, and two additional, full-service hotels are planned in the future. Adjacent to the east

U.S. General Services Administration – NCR Public Building Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager Page 3 of 3

of the warehouse site, a large-scale development is under construction with up to 517,000 square feet of office space. These developments contribute to the dynamic growth in the Franconia-Springfield Area, which is projected to grow vigorously to 24,000 jobs and 7,300 households over the next 25 years.

The redevelopment of the Parr Warehouse with the FBI Headquarters has the potential to contribute to and benefit from the areawide assets as well. In addition, the warehouse site is ideally situated near other FBI facilities in the region and Quantico, VA. The GSA warehouse site saves \$75 million in already existing secure fiber optics for FBI communication needs. The FBI could use this existing fiber for their secure connections, substantially reducing development costs.

With these considerations in mind, the county is looking forward to participating in the review process for the potential FBI Headquarters relocation. County staff will form a project "Core" team especially for the review process to facilitate any project approvals and address public improvements necessary to facilitate development at the site. The Core team approach is an efficient and mission-critical system to quickly address project needs.

Thank you for your attention and for your consideration of our comments. The FBI and the GSA are encouraged to contact Fred R. Selden, Director of the Department of Planning and Zoning at (703) 324-1262 with any questions or comments.

Sincerely,

Edward L. Long Jr.

County Executive

cc: Fairfax County Board of Supervisors

Elward L. Ly

Robert A. Stalzer, Deputy County Executive

Fred R. Selden, Director, Department of Planning and Zoning

Thomas P. Biesiadny, Director, Department of Transportation

Barbara A. Byron, Director, Office of Community Revitalization





Eric C. Brown, Executive Director

Paul E. Rowe, Chair - Board of Commissioners

September 29, 2014

U.S. General Services Administration – NCR Public Buildings Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, D.C. 20407

Dear Ms. Francis:

Thank you for inviting our comments on the acquisition of a consolidated FBI Headquarters (HQ) at a new permanent location and the exchange of the J. Edgar Hoover (JEH) Building parcel. We have only one comment on each of the proposed Prince George's County sites.

As shown in the enclosed National Wetlands Inventory map, there are wetlands in the vicinity of the Greenbelt site. It is hoped that appropriate measures will be taken to mitigate or eliminate any adverse impact on the wetland areas.

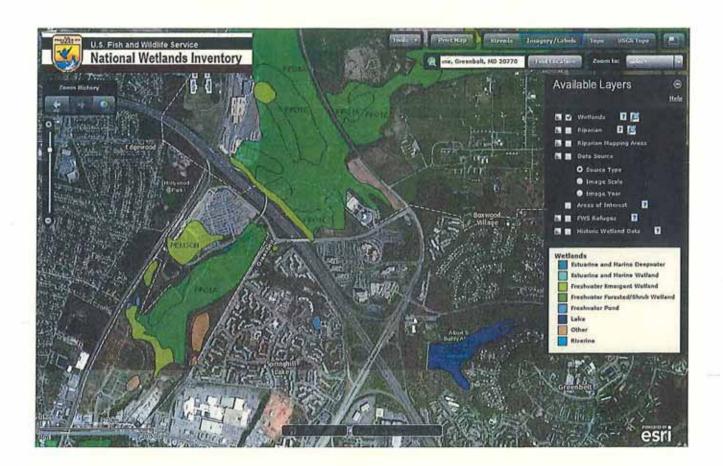
For the Landover site, it is believed that the site will receive an increase in traffic. It is hoped that appropriate measures are taken to properly manage the increased traffic.

Sincerely

Eric C. Brown
Executive Director

Enclosure

cc: Sharon R. Land, Deputy Director
Estella Alexander, Deputy Director
Linda G. Kruelle, Environmental Review Officer
Susanne A. Sotirchos, HUD Field Environmental Officer







Maryland Department of Planning

September 9, 2014

Ms. Nia Francis Project Manager, Office of Planning and Design Quality U.S. General Services Administration 301 7th Street, SW, Room 4004 Washington, DC 20407

STATE CLEARINGHOUSE REVIEW PROCESS

State Application Identifier:

MD20140909-0736

Reply Due Date:

10/19/2014

Project Description: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Federal

Bureau of Investigation (FBI) Headquarters Consolidation and Exchange of the J. Edgar Hoover

Building: consider 3 sites: 2 in MD and 1 in VA

Project Location:

Prince George's County, and Virginia; and the District of Columbia

Clearinghouse Contact:

Bob Rosenbush

Dear Ms. Francis:

Thank you for submitting your project for intergovernmental review. Your participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps to ensure that your project will be consistent with the plans, programs, and objectives of State agencies and local governments.

We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Department(s) of Natural Resources, the Environment, Transportation, State Police, Business and Economic Development, General Services, Labor, Licensing and Regulation; the County of Prince George's; the Maryland-National Capital Park and Planning Commission in Prince George's County; and the Maryland Department of Planning; including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence.

Please be assured that we will expeditiously process your project. The issues resolved through the MIRC process enhance the opportunities for project funding and minimize delays during project implementation. If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at bob.rosenbush@maryland.gov. Thank you for your cooperation with the MIRC process.

Sincerely,

Janey, J.D., Assistant Secretary

The Clearinghouse is pleased to announce that we have created an online "User Survey" for your P.S. convenience. For more information, go to: http://is.gd/Tq4YFm. We appreciate your feedback. Thank you. LCJ:BR

14-0736 NRR.NEW.doc

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

Richard Eberhart Hall, AICP. Secretary Amanda Stakem Conn, Esq., Deputy Secretary



Sustainable____Attainable

October 22, 2014

Ms. Nia Francis
Project Manager, Office of Planning and Design Quality
U.S. General Services Administration
301 7th Street, SW, Room 4004
Washington, DC 20407

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20140909-0736 Applicant: U.S. General Services Administration

Project Description: Notice of Intent to Prepare Environmental Impact Statement for the Proposed Federal Bureau of Investigation Headquarters Consolidation and Exchange of the J. Edgar Hoover Building:

consider 3 sites: 2 in Maryland and 1 in Virginia;

Project Location: Prince George's County, and Virginia; and the District of Columbia

Approving Authority: U.S. General Services Administration

Recommendation: Consistent with Qualifying Comments and Contingent upon Certain Actions

Dear Ms. Francis:

In accordance with Code of Maryland Regulation (COMAR) 34.02.02.04-.07, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter, with attachments, constitutes the State process review and recommendation based upon comments received to date. As a result of the review, it was determined, during the scoping period, that preparing an environmental impact statement concerning the proposed consolidation of the Federal Bureau of Investigation's (FBI) Headquarters at one of three sites (two of which are located in Maryland) is consistent with known State and local plans, programs, and objectives.

There are two sites being considered in Maryland:

- (1) Washington Metro Area Transit Administration owns the +/-62 acres Greenbelt site which is adjacent to the Greenbelt metro. It serves the Green and Yellow lines and the MARC Commuter train. This site is also located inside the Beltway. To mitigate adverse impacts, the Board of Public Works of the State of Maryland approved the donation of several acres of perpetual security easement to the U.S. General Services Administration (GSA) at the Greenbelt Metro Station property for use as a security buffer easement to protect the FBI Headquarters Building that may locate there.
- (2) The privately owned Landover site-the former Landover Mall- consists of 80+/- acres and is approximately 1.97 miles from the Largo Town Center metro center. This site is located inside the Beltway and serves the Blue and Silver Metro Lines.

Martin O'Malley, Governor Anthony G. Brown, Lt. Governor Richard Eberhart Hall, AICP, Secretary Amanda Stakem Conn, Esq., Deputy Secretary

State Application Identifier #: MD20140909-0736

As noted above, the Board of Public Works of the State of Maryland has approved the granting of a perpetual security easement to the GSA at the Greenbelt Metro Station property for use as a security buffer easement to protect the FBI Headquarters Building that may locate there. The granting of a perpetual security easement was circulated by the State Clearinghouse for intergovernmental review as MD20131126-0830.

Review comments were requested from the Maryland Departments of <u>State Police</u>, <u>Business and Economic Development</u>, <u>General Services</u>, <u>Labor</u>, <u>Licensing and Regulation</u>, <u>Natural Resources</u>, <u>Transportation</u>, the <u>Environment</u>; <u>Prince George's County</u>; the <u>Maryland-National Capital Park and Planning Commission in Prince George's County</u>; the <u>Washington Metropolitan Area Transit Authority</u>, the <u>City of Greenbelt</u>; and the <u>Maryland Department of Planning</u>, including the <u>Maryland Historical Trust</u>. The Maryland Department of Labor, <u>Licensing and Regulation did not have comments at this time</u>. As of this date, the <u>Washington Metropolitan Area Transit Authority</u> (WMATA) have not submitted comments. **This recommendation is contingent upon the applicant considering and addressing any problems or conditions that may be identified by their review. Any comments received will be forwarded**. The Clearinghouse received the following comments:

1. Maryland Department of Transportation (MDOT)

MDOT found this project to be generally consistent with their plans, programs, and objectives, and included certain qualifying comments that are summarized below.

Greenbelt Metro Station

- Since late 2013, the SHA and the Maryland Department of Transportation (MDOT) have been engaged in
 ongoing discussions with the County and developers regarding the potential for the relocation of FBI HQ to the
 Metro station site. These discussions led to SHA's development of concepts for adding the missing movements to
 the Greenbelt Metro interchange and the widening along I-95/I-495 (Capital Beltway). Overall, the project consists
 of:
 - 1. A new flyover ramp from the outer loop of I-495 to the Metro station.
 - 2. A new direct ramp from the Metro station to the inner loop of I-495 and the realignment of the existing direct outer ramp from the inner loop adjoining the flyover ramp.
 - The widening of I-95/I-495 for full auxiliary lanes between the MD 201 and US 1 along the outer loop and inner loops.
 - 4. An auxiliary lane on the inner loop from MD 201 to the Baltimore/Washington Parkway.
 - 5. The extension of two multi-cell box culverts over a tributary of Indian Creek.
 - 6. The widening of the inner loop bridge of I-495 over MD 193.
 - 7. Superstructure replacement of inner and outer loop bridges over Rhode Island Avenue.
- On October 7, 2014, the SHA met with the FBI to discuss transportation scoping for the two potential FBI sites that have been identified in Prince George's County (Greenbelt Station site and Landover Mall site). The SHA communicated to representatives of the FBI that for the Greenbelt Metro site, the EIS should consist of an assessment of potential traffic impacts generated by the HQ site (including the other proposed developments at the site), and a detailed description of the scope of the project that includes the proposed interchange at the Greenbelt Metro station and the associated improvements along I-95/I-495 (Capital Beltway).
- The SHA presented the proposed interchange and capacity improvements along

State Application Identifier #: MD20140909-0736

I-95/I-495 (Capital Beltway) to the FBI representatives who stated that the layout of the FBI's portion of the Greenbelt site has not been finalized and that the ramp configuration of the SHA's proposed interchange improvements may need to be discussed further to ensure that it is compatible with the FBI site layout. SHA and the FBI are planning to hold additional meetings to discuss the compatibility between the FBI layout and the ramp configuration of the interchange. Once SHA and the FBI have come to an agreement regarding the ramp configuration of the proposed interchange, a detailed description of the interchange and other improvements I-95/I-495 (Capital Beltway) that are needed for the mitigation of the identified traffic impacts should be included as part of the transportation component of the EIS.

• With this site being immediately adjacent to the Greenbelt Metro Station, the EIS should provide a description on how pedestrians will travel between the FBI HQ's and the Metro Station.

Former Landover Mall

- At the aforementioned October 7, 2014 meeting between SHA and the FBI, SHA communicated to FBI representatives that the EIS should consist of an assessment of potential traffic impacts from the FBI relocation and the improvements needed to mitigate the traffic impacts. Particularly, this analysis should at least address the potential traffic impacts for the MD 202/Brightseat Road intersection, I-95/I-495/MD 202 interchange, I-95/I-495/US 50 interchange, I-95/I-495/Arena Drive interchange, and the I-95/I-495/MD 214 interchange.
- This site is located 1.97 miles to the Largo Town Center Metro Station. The EIS should include a
 description on multi-modal options for connecting this site to the Largo Town Center Metro Station (i.e., shuttle
 buses, etc.) and how these services will be maintained.

Both Sites:

 Other items that should be included in the EIS: transit considerations, traffic safety, bicycle and pedestrian considerations.

2. Maryland Department of Planning (MDP)

MDP supports the evaulation (in the form of a draft environmental impact statement) of the potential consolidation of the FBI in a new Headquarters at the Landover and Greenbelt sites. The consolidation at either site in Maryland is consistent with the Prince Georges County's (County) 2035 Approved General Plan. The County's Greenbelt Transit Oriented Development (TOD) Plan, adopted in 2012, specifically mentions in its Goals section the County's desire to locate a federal agency at this site.

• The Greenbelt site is within the County's designated Regional Transit Center, where the County wants to direct the majority of future employment and residential growth and support the centers with extensive transit and transportation infrastructure. Greenbelt is also designated in the Plan as a Primary Employment Area where there is the highest concentrations of economic activity in targeted industry clusters (include the federal government) and have the greatest potential to catalyze future job growth, research and innovation. The Greenbelt Metro Area and MD 193 Corridor Sector Plan, adopted in March 2013, recognizes that there is an important opportunity for the Greenbelt Metro Metropolitan Center to capitalize

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on the potential for relocation of a major employer or GSA employment campus that will include supporting office, retail, and residential uses.

• The former Landover Mall is designated in the County's General Plan as an Employment Area and as "Local Center," which is intended to be a concentration of economic activity and a focal point for concentrated residential development. The Landover Gateway Sector Plan, approved in May 2009, focuses on redevelopment of the former Landover Mall site, and plans for the revitalization and redevelopment of the site and adjacent properties, while also enhancing the quality and character of the Landover Gateway area.

The development of either site in Maryland is consistent with Maryland's smart growth policies for the following reasons:

- Each site is located within a Priority Funding Area (the State's growth areas) which is a requirement for State spending on infrastructure, and capital improvements.
- This portion of the 12 statutory land use policies that reflect the State's ongoing aspiration to develop and
 implement sound growth, and development policy to include: quality of life and sustainability; community
 design; infrastructure; transportation; resource conservation; and stewardship for the protection of natural
 and cultural resources.
- The Greenbelt Metro Station site is a MDOT designated TOD location. State-designated TOD sites are a high priority for development and redevelopment. As a State-designated TOD site, the Greenbelt site would be a priority for: (a) technical assistance provided by the MDOT with regard to planning, and market studies; (b) using financing tools such as Tax Increment Financing and special-taxing districts to help finance infrastructure; (c) addressing and resolving any transportation, and access issues. Designated TODs are also automatically considered to be part of the State's Sustainable Communities designation which provides eligibility for several State grant and loan programs relating to housing, redevelopment, and revitalization
- The TOD designation can be used as criteria in locating State facilities. Governor Martin O'Malley passed an Executive Order in 2009 to emphasize TOD for State facilities, where appropriate and feasible.

3. Maryland Department of the Environment (MDE)

MDE finds this project to be generally consistent with their plans, programs, and objectives and provided these qualifying comments:

Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and
maintained in accordance with applicable State and federal laws and regulations. Underground storage
tanks must be registered and the installation must be conducted and performed by a contractor certified to

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install underground storage tanks by the Land Management Administration in accordance with (COMAR) 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

- If the proposed project involves demolition Any above ground or underground petroleum storage tanks
 that may be on site must have contents and tanks along with any contamination removed. Please contact
 the Oil Control Program at (410) 537-3442 for additional information.
- Any solid waste including construction, demolition and land clearing debris, generated from the subject
 project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible.
 Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste
 activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional
 information regarding recycling activities.
- Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations
 (COMAR) 26.16.01 Accreditation and Training for Lead Paint Abatement Services. If a property was
 built before 1950 and will be used as rental housing, then compliance with (COMAR) 26.16.02 Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional
 guidance regarding projects where lead paint may be encountered can be obtained by contacting the
 Environmental Lead Division at (410) 537-3825.

4. Other State and Local Agencies

The Maryland Departments of Business and Economic Development (DBED), State Police (MDSP), and Natural Resources (DNR), the Maryland-National Capital Park and Planning Commission (M-NCPPC) in Prince George's County, the City of Greenbelt, and MDP), including the Maryland Historical Trust (MHT) found this project to be consistent with their plans, programs, and objectives.

- DBED in the attached response, commented on its coordination efforts with multiple state and county agencies to make each site technically feasible to accommodate the consolidated FBI Headquarters. Locating at these sites will provide an economic catalyst to the surrounding communities. In addition they point out the benefits of the sites being located adjacent to a Capital Beltway Interchange, near Metrorail and other public transportation options and the proximity of numerous Federal partners (in the intelligence, security, and military communities) and institutions of higher education to both of the sites in Maryland.
- The attached responses from DNR elaborates on the ability for both Maryland sites to offer opportunities
 for environmentally sensitive design and redevelopment, where new impacts to natural resources can be
 appropriately avoided and minimized and beneficial activities to include storm water retrofits, habitat

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restoration, and other natural resources improvements can be conducted to improve existing conditions during redevelopment.

The Maryland Department of State Police had no objections to the proposed project.

The City of Greenbelt attached comments dealing with the many positive outcomes that would result from relocation of the FBI facilities to the Greenbelt Metro site, such as reduced employee traveling time, the improved balance of reverse commutes on Metro, the benefits of the site being walkable from the Metro station and its close proximity to mixed use development amenities. In addition the City commented on best practices in environmental site design; mitigation for the wetland areas located in the Greenbelt Metro site; and the use of current delineations of floodplains and wetland areas. See the attached letter.

MHT provided comments regarding further consultation with GSA to complete the historic preservation review of the alternatives in Maryland, pursuant to Section 106 of the National Historic Preservation Act, as project planning progresses. See the attached comments.

The M-NCPPC in Prince George's County commented that staff had attended meetings on this possible, future project in Prince George's County. The M-NCPPC confirmed with the DNR that DNR would take jurisdiction of the environmental review for this site, as it would be considered a Federal project.

M-NCPPC will provide additional, detailed comments as necessary at the time of Mandatory Referral.

5. Prince George's County

Prince George's County shared the below information about floodplains and the appropriate Federal Insurance Rate Map (FIRM). The Prince George's County Department of Permitting, Inspections, and Enforcement is the lead agency to determine the official 1-percent annual chance (100-year) floodplain elevation and should be contacted to determine the governing (approved) elevations. Once the approved floodplain elevations have been determined, those elevations should be used to delineate the floodplain on the site and not what is shown on any floodplain map.

- Site 1 Landover site: The site is free of the 1-percent annual chance (100-year) floodplain as shown on the following: the effective FIRM panel 2452080045D dated September 6, 1996, the DFIRM (revised preliminary dated February 22, 2013) panel 24033C0165E, and along Cattail Branch from the Lower Beaverdam Creek watershed study dated August, 1995.
- Site 2 Greenbelt site: The site contains the 1-percent annual chance (100-year) floodplain from the following studies:
 - Effective FEMA, FIRM panel 2452080015D, dated December 15, 1989 with floodplain elevations between 67.5 to 72 feet (NGVD 29); Revised preliminary DFIRM panels 24033C0043E and 24033C0044E dated February 22, 2013 with floodplain elevations 68.5 to 75 feet (NAVD 88);

Ms. Nia Francis October 22, 2014 Page 7 State Application Identifier #: MD20140909-0736

- Anacostia River watershed study (Indian Creek) panels K/6, K/7, L/6, and L/7 dated September 1993 with floodplain elevations 67.5 to 75 feet (NGVD 29);and
- To convert elevations in NAVD 88, add 0.78 feet to equal elevations in NGVD 29.

The State Clearinghouse is currently circulating, for review and known as MD20140909-0735, a request by WSSC for temporary access to the State land, in the vicinity of the Greenbelt Metro Station, for access to sewer manholes and associated pipeline to complete construction activities for rehabilitation and repairs.

The State Clearinghouse should be kept informed of all decisions made in regard to this project. The Clearinghouse recommendation is valid for a period of three years from the date of this letter. If the Board of Public Works has not made a decision regarding the project within that time period, information should be submitted to the Clearinghouse requesting a review update.

We appreciate your attention to the intergovernmental review process and look forward to continued cooperation. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at bob.rosenbush@maryland.gov.

Thank you for your cooperation with the MIRC process.

Sincerely,

Linda C. Janey, J.D., Assistant Secretary

LCJ:BR Enclosures (8) cc: Tina Quinichette - MDOT David Manning - MDSP Amanda Degen - MDE Greg Golden - DNR Al Sawicki - DLLR Wendy Scott-Napier - DGS Tammy Edwards - DBED Larry Coffman - PGEO Jay Mangalvedhe – M-NCPPCP Celia Craze - GREENBELT Bihui Xu - MDPI-T Peter Conrad - MDPL Beth Cole - MHT Jerry Sanford - DBED



October 16, 2014

Bob Rosenbush, Planner - Maryland Department of Planning

Thank you for the opportunity to comment on the federal government's Environmental Impact Statement as part of the proposed Federal Bureau of Investigation (FBI) Headquarters Consolidation and exchange of the J. Edgar Hoover Building. The two Maryland alternative sites identified by GSA (Landover and Greenbelt) offer the FBI an opportunity to locate this new facility in areas that will allow the FBI to meet its mission. Additionally locating at these sites will provide an economic catalyst to the surrounding communities. Over the past four years, the Maryland Department of Business and Economic Development (DBED) has coordinated efforts of multiple state and county agencies (transportation, planning, permitting, environmental) in an effort to make each site technically feasible to accommodate the Consolidated FBI Headquarters. Both sites not only meet but exceed the project's requirements.

Additional benefits of the Greenbelt and Landover Maryland alternative sites include:

- Located in Prince George's County, Maryland, immediately adjacent to a Capital Beltway Interchange, near Metrorail and other public transportation options.
- Located near the following agencies and institutions with similar and compatible missions:
 - US Cyber Command Fort Meade;
 - National Security Agency Fort Meade;
 - Defense Information Systems Agency (DISA) Anne Arundel County;
 - National Institute of Standards and Technology (NIST) Montgomery County;
 - National Cybersecurity Center of Excellence Montgomery County;
 - Cyber Crime Center (DC3) Anne Arundel County;
 - Intelligence Advanced Research Projects Activity (IARPA) College Park;
 - Joint Base Andrews Camp Springs;
 - Center of Academic Excellence in Information Assurance Education (designation by Department of Homeland Security and National Security Agency) - Bowie State University;
 - Department of Homeland Security Center of Excellence in Terrorism Studies -University of Maryland, College Park
 - Laboratory for Physical Sciences College Park Maryland





- Laboratory for Telecommunication Sciences College Park, Maryland
- High Intensity Drug Traffic Administration (HIDTA) College Park, Maryland
- U.S. Bureau of Alcohol Tobacco and Research Center Beltsville, Maryland
- U.S. Bureau of Alcohol Tobacco and National Fire Test Center Beltsville, Maryland
- Intelligence Advanced Research Projects Activity Headquarters College Park
- Center for the Advanced Study of Language College Park
- Both sites are close to the residences of the plurality of FBI employees: 43% of FBI employees
 call Maryland Home, 33% Virginia and 17% D.C. (estimate based on U.S. Census Bureau's
 Longitudinal Employer-Household Dynamics (LEHD) program using federal employees working near
 the FBI's current headquarters)
- According to a 2007 study by the National Center for Smart Growth Research and Education and the University of Maryland Real -Estate Development Program, Prince George's County has 32.7% of the Greater Washington Region's land area, 22.5% of its population and 25.7% of the regions federal workforce but only 5.2% of the region's GSA leased offices.
- Relocation of the FBI headquarters to Prince George's County will be the catalyst for further
 development and redevelopment in the immediate vicinity of each site. Each site has
 significant planned developed nearby including the Greenbelt Station South Core (1,000
 residential units) and the Prince George's County Regional Medical Center (partnership with
 University of Maryland Medical System).
- There is strong state, county and local community support for this project to be located at the Landover or Greenbelt alternative sites in Prince George's County, Maryland.

Kind Regards,

Jerry 7. Sanford

Jerry T. Sanford
Director Business Recruitment and Location Services
Maryland Department of Business and Economic Development
401 E. Pratt Street, Baltimore, MD 21202

9

MD DNR Comments to MD State Clearinghouse, for MD20140909-0736 Re: Notice of Intent to Prepare Environmental Impact Statement for the Proposed Federal Bureau of Investigation (FBI) Headquarters Consolidation

Attention: Bob Rosenbush, MDP

Prepared by: MD DNR, Project Review Division, Integrated Policy and Review Unit,

attn: Greg Golden

October 17, 2014

MD Department of Natural Resources (DNR) is pleased to have the opportunity to provide scoping comments on this important project.

We have natural resource information and analysis capability for the two sites within Maryland, Greenbelt and Landover. Both Maryland sites offer important opportunities for environmentally sensitive redevelopment, where new impacts to natural resources can be appropriately avoided and minimized, and beneficial activities to include stormwater retrofits, habitat restoration, and other natural resource improvements can be conducted to improve existing conditions during redevelopment.

Both Maryland sites offer opportunities for environmentally sensitive design and restoration that will benefit both the site itself, and downstream and downslope habitats and watershed reaches. For these reasons, we are very enthusiastic to play a review role in scoping and planning for the two Maryland sites.

Before providing notes on each of two Maryland sites, we provide the following support and encouragement for state-of-the-art redevelopment approaches, which we understand this project will utilize. Environmentally sensitive design, especially when applied to redevelopment of areas with extensive existing impervious surfaces, is an important component to conservation approaches in urban and suburban areas. These areas already have high impervious surface levels, and hydrology in the streams and wetlands nearby typically has been altered. The proposed project as described offers much opportunity to lessen the effects, and possibly the acreage, of existing impervious surfaces. Green building approaches have multiple beneficial aspects across a number of conservation themes. Importantly, stormwater runoff can be managed and reduced both by building design, and in stormwater management strategies in the nearby landscape. The end result can be less "flashy" runoff events (e.g., runoff that is better managed to infiltrate into the ground and attenuate throughout the site rather than being rapidly conveyed to the stream). This in turn provides more dependable hydrology throughout the year from improved infiltration into shallow groundwater, and then later slow release to wetlands and streams.

Reforestation opportunities and other habitat improvements are also important for these redevelopment sites. These opportunities may include removing impervious surfaces to



plant trees and/or additional forest vegetation restoration, improving stream and wetland buffers, creating wetland habitat where appropriate, and related activities. MD DNR will work with local agencies to coordinate review under the MD Forest Conservation Act, to protect and restore forest resources. We will have information available for the EIS Team to utilize in their analysis of forest conservation measures. MD DNR will also cooperate with Maryland Department of the Environment to optimize protection of wetlands, wetland buffers, and streams. The EIS process should include study and analysis of these issues. Our initial scoping indicates that both Maryland sites offer ample opportunity to conserve and restore these natural resources during a beneficial redevelopment approach with environmentally sensitive design elements included.

We are providing certain site-specific natural resource information below for the two sites in Maryland. Additionally, MD DNR has other GIS resource data layers that may be of interest and use to the EIS team. We welcome requests and coordination efforts to further share natural resource information in these data layers. These data layers will help indicate the value of wise redevelopment of the two Maryland sites to benefit habitat and water quality values in the surrounding watershed areas, and to link landscape scale conservation values.

Scoping information for the two sites (in alphabetical order):

Greenbelt: The Greenbelt Metro site is adjacent to the Indian Creek stream corridor. Indian Creek is potential habitat for anadromous fish migrations and spawning, and is part of a greater overall restoration and resource conservation effort in the Anacostia River basin. Several resident fish species are expected to exist in Indian Creek year around. A State-listed sensitive plant species is found in the Indian Creek stream corridor in this area (further information available upon request and coordination). Previous detailed reviews of this site have determined that the plant can be appropriately conserved by minimizing impacts in the natural floodplain and stream corridor. Activities related to required security fencing, utility improvements, and walking paths within the floodplain have been reviewed and considered in past reviews as well, and can be studied in the EIS for detailed beneficial avoidance and minimization measures. Stormwater management retrofits and environmentally sensitive design in redevelopment of upland areas can protect and even improve hydrology and habitat in the floodplain and stream corridor. The Anacostia River and its tributaries are designated within the State's Scenic and Wild Rivers Program. EIS review should address the Environmental Sensitive Design opportunities, potential and proposed stormwater designs and retrofits, impervious surface reductions if feasible, floodplain and riparian corridor protection, stream restoration potential in the onsite tributary, and forest conservation/reestablishment.

Landover: The Landover Mall site is located on an upland area which drains to the west to Cattail Branch or Creek, a tributary to Beaverdam Creek and the Anacostia River (designated in the State's Scenic and Wild Rivers Program). These waterways will also benefit from stormwater and hydrology improvements. Cattail Branch is heavily affected



MD 20140909-0736

by surrounding development; several resident fish species may be present in certain stream reaches. Without further study we are not certain whether any existing drainage infrastructure may send site runoff to the east or southeast, so the EIS study can further analyze runoff patterns and drainage directions. Current GIS screening layers show a rare species indicator a short distance to the south of this site. Preliminary coordination with our Wildlife and Heritage Service experts indicates that this is an older record, is qualified by more recent determinations, and is not a concern for the proposed site. EIS review should address the Environmental Sensitive Design opportunities, potential and proposed stormwater designs and retrofits, impervious surface reductions if feasible, and forest conservation/re-establishment.

Both Maryland sites offer opportunity to provide benefits to the Anacostia River system through "green" redevelopment features and practices. During EIS studies and literature review, additional information on survey data for fish and other aquatic species in the region can be shared and analyzed.

MD DNR looks forward to additional coordination and collaboration to maximize redevelopment, retrofit, and restoration potential at either or both of the Maryland sites under consideration.

For any questions or further coordination, please contact Greg Golden of the MD DNR Project Review Division, Integrated Policy and Review Unit, at 410-260-8331, or greg.golden@maryland.gov.

CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886

MD20140909-

October 14, 2014



CITY COUNCIL

Emmett V. Jordan, Mayor Judith F. Davis, Mayor Pro Tem Konrad E. Herling Leta M. Mach Silke I. Pope Edward V.J. Putens Rodney M. Roberts



Dear Ms. Francis:

Thank you for the opportunity to provide comments for the scoping process of the FBI Facility Consolidation and Relocation Environmental Impact Statement (EIS). We understand that the EIS will analyze potential impacts of this project on three alternative sites in the Washington metropolitan area. Relocation to a new consolidated facility will have considerable benefits to the region and will impact our local community in many ways. Since the Greenbelt Metro site is located within the City of Greenbelt limits, we appreciate the opportunity to help determine issues to be studied and addressed through the EIS.

We believe there are many positive outcomes that would result from relocation of the FBI facilities to the Greenbelt Metro site for our community, the region, and for FBI employees. This site is adjacent to the Greenbelt Metro station and other robust regional transportation infrastructure. As the EIS studies transportation, traffic and parking impacts, we hope it will evaluate the benefits unique to the Greenbelt site, including but not limited to, reduced employee traveling time to the site, the improved balance of reverse commutes on Metro, the benefits of the site being walkable from the Metro station and its close proximity to mixed use development amenities. The City believes these benefits cannot be overlooked and are just some of the reasons why Greenbelt is the ideal site for the new FBI headquarters.

Greenbelt is a strong advocate for projects that positively impact the natural environment. Currently, the Greenbelt Metro site has 40 acres of impervious surface parking generating untreated stormwater runoff into Indian Creek. Redeveloping this site to serve as the new FBI HQ will change this dynamic by incorporating state of the art stormwater measures and low impact development. We encourage the General Services Administration to consider how best practice environmental site design may not only impact but improve the environmental conditions of the site and nearby stream valley.



A NATIONAL HISTORIC LANDMARK (301) 474-8000 FAX: (301) 441-8248 www.greenbeltmd.gov





U.S. General Services Administration – NCR Office of Planning and Design Quality Attn: Nia Francis, Project Manager October 14, 2014 Page 2 of 2

The City is supportive of the issues that the EIS will analyze and believes there are additional issues that should be considered, including the following:

- The Council would like the EIS to study and provide impact analysis on elements of site
 design that may be associated with Level V security standards. In particular, we are
 interested in impacts associated with fencing, gates and roads in the wetland areas of the site
 and potential mitigation of impacts for such facilities.
- At the scoping meeting held on September 23, 2014, many of the graphics appeared to represent outdated delineations of floodplains and wetland areas. We recommend the EIS study process reflect and utilize current updates or changes to these features of the Greenbelt Metro site.
- As the EIS develops comparisons of no build and build scenarios, we also encourage the General Service Administration to include impact analysis for the total timeframe of construction, including recycling of debris and use of sustainable building materials.

On behalf of the City Council, I want to thank you again for this opportunity to comment and to reiterate that the city would like to be included in all upcoming process opportunities.

Sincerely,

Emmett V. Jordan

Mayor

/jb

cc: City Council

Honorable Barbara Mikulski

Honorable Benjamin Cardin

Honorable Steny Hoyer

Honorable Rushern Baker

Honorable Ingrid Turner

David Iannucci, Assistant Deputy Chief Administrative Officer,

Economic Development and Public Infrastructure

Garth Beall, Attorney, McNamee Hosea

Michael McLaughlin, City Manager

Celia Craze, Director, Planning & Community Development

H



Sustainable____Attainable

October 14, 2014

Nia Francis, Project Manager
U.S. General Services Administration – NCR
Public Buildings Service
Office of Planning and Design Quality
301 7th Street, SW
Room 4004
Washington DC 20407

Re:

Proposed Federal Bureau of Investigation (FBI) Headquarters Consolidation

State Clearinghouse No. MD20140909-0736

Prince George's County, Maryland

Dear Ms. Francis:

Thank you for your recent letter, dated September 4, 2014 and received by the Maryland Historical Trust (Trust) on September 8, 2014, 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.

We understand that GSA proposes to consolidate components of the FBI Headquarters into a rentable facility (up to 2.1 million square feet) to provide secure space to meet program requirements. GSA's study will examine three site alternatives, including two located in Maryland (Greenbelt and Landover) and one in Virginia. The Trust, Maryland's State Historic Preservation Office, will be involved in the review of the project's Maryland alternatives for effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. We look forward to working with GSA and other involved parties as planning progresses 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 amanda.apple@maryland.gov or me (for archeology) at 410-514-7631 / beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole

Administrator, Project Review & Compliance

Maryland Historical Trust

EJC/201404749

ce: Bob Rosenbush (MDP)

Howard Berger (M-NCPPC, Prince George's County)

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

Richard Eberhart Hall, AICP Secretary Amenda Stakem Conn. Esq., Deputy Secretary



October 16, 2014

Bob Rosenbush, Planner - Maryland Department of Planning

Thank you for the opportunity to comment on the federal government's Environmental Impact Statement as part of the proposed Federal Bureau of Investigation (FBI) Headquarters Consolidation and exchange of the J. Edgar Hoover Building. The two Maryland alternative sites identified by GSA (Landover and Greenbelt) offer the FBI an opportunity to locate this new facility in areas that will allow the FBI to meet its mission. Additionally locating at these sites will provide an economic catalyst to the surrounding communities. Over the past four years, the Maryland Department of Business and Economic Development (DBED) has coordinated efforts of multiple state and county agencies (transportation, planning, permitting, environmental) in an effort to make each site technically feasible to accommodate the Consolidated FBI Headquarters. Both sites not only meet but exceed the project's requirements.

Additional benefits of the Greenbelt and Landover Maryland alternative sites include:

- Located in Prince George's County, Maryland, immediately adjacent to a Capital Beltway Interchange, near Metrorail and other public transportation options.
- Located near the following agencies and institutions with similar and compatible missions:
 - US Cyber Command Fort Meade;
 - National Security Agency Fort Meade;
 - Defense Information Systems Agency (DISA) Anne Arundel County;
 - National Institute of Standards and Technology (NIST) –Montgomery County;
 - National Cybersecurity Center of Excellence Montgomery County;
 - Cyber Crime Center (DC3) Anne Arundel County;
 - Intelligence Advanced Research Projects Activity (IARPA) College Park;
 - Joint Base Andrews Camp Springs;
 - Center of Academic Excellence in Information Assurance Education (designation by Department of Homeland Security and National Security Agency) - Bowie State University;
 - Department of Homeland Security Center of Excellence in Terrorism Studies -University of Maryland, College Park
 - Laboratory for Physical Sciences College Park Maryland





- Laboratory for Telecommunication Sciences College Park, Maryland
- High Intensity Drug Traffic Administration (HIDTA) College Park, Maryland
- U.S. Bureau of Alcohol Tobacco and Research Center Beltsville, Maryland
- U.S. Bureau of Alcohol Tobacco and National Fire Test Center Beltsville, Maryland
- Intelligence Advanced Research Projects Activity Headquarters College Park
- Center for the Advanced Study of Language College Park
- Both sites are close to the residences of the plurality of FBI employees: 43% of FBI employees
 call Maryland Home, 33% Virginia and 17% D.C. (estimate based on U.S. Census Bureau's
 Longitudinal Employer-Household Dynamics (LEHD) program using federal employees working near
 the FBI's current headquarters)
- According to a 2007 study by the National Center for Smart Growth Research and Education and the University of Maryland Real -Estate Development Program, Prince George's County has 32.7% of the Greater Washington Region's land area, 22.5% of its population and 25.7% of the regions federal workforce but only 5.2% of the region's GSA leased offices.
- Relocation of the FBI headquarters to Prince George's County will be the catalyst for further development and redevelopment in the immediate vicinity of each site. Each site has significant planned developed nearby including the Greenbelt Station – South Core (1,000 residential units) and the Prince George's County Regional Medical Center (partnership with University of Maryland Medical System).
- There is strong state, county and local community support for this project to be located at the Landover or Greenbelt alternative sites in Prince George's County, Maryland.

Kind Regards,

Jerry 7. Sanford

Jerry T. Sanford
Director Business Recruitment and Location Services
Maryland Department of Business and Economic Development
401 E. Pratt Street, Baltimore, MD 21202

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Martin O'Malley, Governor Anthony G. Brown, Lt. Governor James T. Smith, Jr., Secretary Melinda B. Peters, Administrator

September 17, 2014

Nia Francis, Project Manager
US General Services Administration-NCR
Public Buildings Service
Office of Planning & Design Quality
301 7th Street, SW, Room 4004
Washington DC 20407

Dear Ms. Francis:

Thank you for your September 4, 2014 letter regarding the scoping process for the consolidation of the Federal Bureau of Investigation (FBI) Headquarters and for consideration in the technical analyses and Environmental Impact Statement (EIS) prepared for this project. The Maryland State Highway Administration (SHA) is pleased to respond to your request for comments. Our comments will focus on the Greenbelt and Landover sites that are under consideration and the factors that need to be considered in the EIS.

The relocation of a considerably sized workforce, such as the 11,000 persons that work for the FBI Headquarters, may result in significant impacts to the transportation system surrounding the selected site. The information released to date by the General Services Administration (GSA) indicates that good multimodal access is a requirement for site selection, and therefore there will likely be impacts to the surrounding transit and roadway systems along with a need to provide pedestrian and bicycle connectivity within the site and to the local community. The EIS prepared for the FBI Headquarters consolidation and relocation should consider how these various modes will be affected by the project, and what changes will be needed to accommodate the travel of the FBI employees and any associated support development.

The capacity of the regional transit system to serve the anticipated ridership by FBI employees, particularly the Metro System operated by the Washington Metropolitan Area Transit Authority (WMATA), will need to be addressed, and non-motorized mode connectivity to reduce reliance on automobile traffic for local access should be provided as part of the development plan. SHA expects that even with a large percentage of commuting trips for this development occurring by modes other than the automobile, there will still be an increase in traffic volumes on area roadways due to those employees who commute alone or by carpool. To analyze the impacts at either the Greenbelt or Landover site, the volume of vehicular traffic to be added by the development will need to be forecasted and distributed to the roadway system, and the resulting total traffic volumes compared to the capacities of the various highways in the study area.

My telephone number/toll-free number is 410-545-0400 or 1-800-206-0770

Maryland Relay Service for Impaired Hearing or Speech 1.800.735.2258 Statewide Toll Free

Ms. Nia Francis Page Two

The geographic scope of the transportation component of the study should consider that changes to interstate highway access for the Capital Beltway (I-95/I-495) will require Interstate Access Point Approval (IAPA) from the Federal Highway Administration (FHWA). FHWA generally requires that the study area for an IAPA study extend a minimum of one interchange up- and downstream from the affected interchange(s). IAPA would not be needed until a preferred alternative or site are identified during the preparation of the Final Environmental Impact Statement (FEIS). Please coordinate this process with Mr. David Rodgers, Assistant Regional Planner, Regional and Intermodal Planning Division (RIPD), SHA at 410-545-5670 or email at drodgers1@sha.state.md.us. He will coordinate this process with other elements of SHA and FHWA to gain this approval. We would also recommend that FHWA be invited to be a cooperating agency in the preparation of the EIS so that it may adopt this document in support of the IAPA.

The Greenbelt site would require analyses from west of the US 1 interchange to east of the Baltimore-Washington Parkway (MD 295) interchange, assuming that there will be the need for highway improvements surrounding the Greenbelt Metro Station and MD 201 interchanges. The Greenbelt Metro site would include MD 193, MD 201, US 1, and Cherrywood Lane. The Landover site will require analysis for the additional traffic on the MD 202 and Arena Drive interchanges. The project area would possibly extend along the Capital Beltway from north of the US 50 interchange to south of the MD 214 interchange. Local, State, County and municipal roadways will also support additional traffic from the FBI site and should also be analyzed for their operational capacity. Roadways such as MD 202, MD 214, Arena Drive, and Brightseat Road would need to be investigated for the Landover location. SHA staff will be glad to work with GSA, FHWA, Maryland National Capital Park and Planning Commission (MNCPPC) and Prince George's County in determining the specifics of the study area for either or both Maryland sites.

The forecast of site related trips and the roadway operational analyses should be conducted using methodologies recognized and supported by SHA and FHWA. We recommend that the forecast of traffic volumes on the study area roadways be based on the regional travel demand model maintained by the Metropolitan Washington Council of Governments (MWCOG) along with site and FBI specific travel information. The study of roadway operations should be done utilizing comprehensive traffic software, such as VISSIM, which allows for the analytical and visual examination of operations as well as accounts for the dynamic interactions of the various highway system components on each other. Operational analyses for the development should consider impacts to site access points due to any specific needs for the high security facility, such as potential queuing from vehicle security checks. We are unsure how long it would take to clear vehicles coming into the new facility and how a queue would affect the roadway network, specifically the Beltway ramps and mainline roadway.

Ms. Nia Francis Page Three

As with the scoping of the study area, SHA staff is prepared to share the tools and data that have been developed for this area by our agency with the GSA. Please contact Ms. Lisa Shemer, Assistant Division Chief, Travel Forecasting Section, Data Services Engineering Division, SHA at 410-545-5640 or email at lshemer@sha.state.md.us for assistance or information regarding travel forecasting, demand, analyses and conclusions.

Once a selected alternative or site has been identified, after the FEIS is approved and during the design phase, the developer will need to submit six hard copies and one electronic copy of the Traffic Impact Study (TIS) to SHA's Access Management Division (AMD) via the MNCPPC development review process. SHA requires 45-60 days for a TIS review. Upon TIS approval, any off-site mitigation within SHA right of way will be subject to the terms and conditions of an access permit from the SHA-AMD. Please coordinate with Mr. Steve Foster, Chief, AMD, SHA at 410-545-5601 or email at sfoster1@sha.state.md.us.

SHA is currently working on the design of the Greenbelt Metro interchange and is completing supplemental technical studies and preparing an environmental reevaluation of the previous FHWA approved environmental document for the Greenbelt Metro interchange project. Please coordinate your project scoping, engineering and environmental studies and EIS review with the SHA project and environmental managers for the Greenbelt Metro project to ensure that there is no duplication of effort- Mr. Moreshwar Kulkarni, Office of Highway Development at 410-545-8825 or email at mkulkarni@sha.state.md.us and Ms. Allison Grooms, Environmental Planning Division at 410-545-8568 or email at agrooms@sha.state.md.us, respectively. SHA is not conducting any engineering or environmental studies at this time for the Landover area, but we still want the opportunity to review what is proposed in that area over the course of your project.

We appreciate the opportunity to provide comments and input into the project's scoping process. If you have any questions or concerns, please contact the staff members listed above. They will be happy to assist you. Of course, you should not hesitate to contact me directly.

Sincerely,

Melinda B. Peters

Administrator

cc: Mr. Keith Bounds, Office of Planning and Capital Programming, MDOT

Mr. Steven Foster, Access Management Division, SHA

Ms. Allison Grooms, Environmental Planning Division, SHA

Mr. Moreshwar Kulkani, Office of Highway Development, SHA

Mr. David Rodgers, Regional and Intermodal Planning Division, SHA

Ms. Lisa Shemer, Data Services Engineering Division, SHA

Mr. Gregory I. Slater, Director, Office of Planning and Preliminary Engineering, SHA



October 10, 2014

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Media Partners

Mount Vernon Gazette Mount Vernon Voice Nia Francis Project Manager General Services Administration 301 7th Street, S.W. Room 4004 Washington, DC 20407

Dear Ms. Francis,

Mount Vernon-Lee Chamber of Commerce is writing to express our strong support for relocating the Federal Bureau of Investigation (FBI) Headquarters to Springfield, Virginia. As the General Services Administration (GSA) identifies issues and potential impacts associated with consolidating FBI Headquarters, the GSA Warehouse site in Springfield best meets the expressed criteria of cutting costs, helping the Bureau serve the American people, and shrinking the Federal footprint.

Selection of the Springfield site will provide access to a well-developed transportation system, close proximity to other FBI assets, and local amenities for employees and their families. There are no issues regarding this proposed development that would affect cultural, environmental or historic resources in the community.

Access to various modes of transportation will be a key indicator for a smooth transition to a new location. The GSA Warehouse complex has access to various forms of transportation unrivaled in the D.C. region. The site is located adjacent the Franconia-Springfield Metro Station, allowing use of the Blue Line with Yellow Line Rush-Plus service and it is within walking distance of the Virginia Railway Express (VRE). FBI employees would also have access to multiple bus systems connecting to other transit systems and throughout the Metro area. In addition, the GSA Warehouse site is within a minute's drive of nearly all the area's major highways including I-95, I-395, and I-495.

Due to the multi- transit features of this site, relocating the FBI Head-quarters to Springfield, Virginia will have a minimal effect on traffic in the immediate vicinity of the site and the larger region. Recent new investment in HOT lanes on I-395 and I-495 is an additional benefit for commuters. The infrastructure is already in place to seamlessly handle the 11,000 jobs that come with development of this magnitude.

The GSA Warehouse in Springfield would be the site closest to other FBI assets used by employees. Employees could reach training facilities in Quantico by using the nearby VRE station or accessing the HOT lanes on I-95. The CIA facility in Langley is also a quick trip from Springfield. Fort

FBI Headquarters Letter Page Two

Belvoir with its more than 140 defense related agencies is nearby. Relocating all FBI offices in the DC Metro area to Springfield is a cost-saving measure that benefits both taxpayer and employees.

Local amenities for employees and their families include the world-class Fairfax County Public School system, access to various modes of transportation, proximity to the newly developed Springfield Town Center, neighboring Fort Belvoir and its resources, and a community that welcomes this move with open arms. Local businesses and the community would see much positive growth from selecting this site and FBI employees and their families would also benefit from this location.

Thank you for the opportunity to weigh in on this critical project. We believe the attributes of the GSA Warehouse make it the best selection for the FBI Headquarters relocation, a move that will bring about many positive changes with minimal impacts to community resources. We look forward to welcoming the FBI to the Springfield area.

Sincerely,

Ashley McNeff Behrens

CC: Chairman Sharon Bulova
Supervisor Gerald Hyland
Supervisor Jeff McKay
Congressman James Moran
Congressman Gerry Connolly
US Senator Tim Kaine
US Senator Mark Warner

6821 Richmond Highway | Alexandria, VA 22306 703-360-6925 | 703-360-6928 (FAX) Info@MtVernon-LeeChamber.org www.MtVernon-LeeChamber.org



401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 Fax 202.482.7272 www.ncpc.gov

IN REPLY REFER TO: NCPC File No. 7613

October 21, 2014

Ms. Nia Francis United States General Services Administration 301 7th Street, SW Room 7600 Washington, DC 20407

Re: Environmental Impact Statement Scoping Comments for the Federal Bureau of Investigation (FBI) Consolidation.

Dear Ms. Francis:

The National Capital Planning Commission (NCPC) submits the following scoping comments in response to the United States General Services Administration's (GSA) Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed acquisition and consolidation of the Federal Bureau of Investigation (FBI) at a new location in exchange for the site of the existing FBI headquarters, J. Edgar Hoover Building, located at 901 Pennsylvania Avenue, NW. According to the NOI, the purpose of the proposed action is to:

- Consolidate existing FBI offices and divisions into one location in the greater Washington, DC area; and
- Provide the FBI with a headquarters facility that meets the Interagency Security Council, Level 5 security standards.

NCPC requests that the EIS analyze the following topic areas to assess the potential impacts of development. The topics are organized into two sections. The first section will focus on the exchange of the existing FBI headquarters site. The second section will focus on the three alternative sites being considered for the development of a new consolidated FBI Headquarters. In addition, as the federal government's central planning agency in the National Capital Region, and NCPC's role in reviewing public and private developments for consistency with the PADC Plan, we respectfully request to be a cooperating agency on the EIS.

Exchange of existing FBI headquarters site - 901 Pennsylvania Avenue, NW

The existing FBI headquarters, J. Edgar Hoover Building, site is located within the area of the 1974 Pennsylvania Avenue Development Corporation (PADC) Plan. Public Law 104-134, dated April 1, 1996, transferred the responsibilities to amend, complete, and ensure compliance with the PADC Plan to GSA and NCPC. The National Park Service (NPS) was given jurisdiction of the land within the Pennsylvania Avenue National Historic Site, including the sidewalks, parks, and commemorative elements. The District Department of Transportation (DDOT) has

jurisdiction over the roadway(s). While each agency has various responsibilities, NCPC is responsible for ensuring development within the area complies with the PADC Plan and Square Guidelines, and is authorized to review public and private development building permits under an Memorandum of Agreement, dated July 25, 1996, established to carry out PADC responsibilities.

With regard to the exchange of the existing FBI headquarters site, NCPC requests that the EIS analyze potential direct, indirect, and cumulative impacts to transportation, urban design, environmental stewardship, security, and historic character.

<u>Transportation</u> - Due to its location along a multi-modal corridor, redevelopment of the existing FBI site could impact the surrounding transportation network, including bicycle and pedestrian circulation, access to Metrorail, and vehicular levels of service of nearby intersections at peak and off peak hours. Therefore, the EIS should analyze potential impacts to the following:

- Pedestrian, bicycle, and vehicular circulation, including parking, caused by demolition of the existing FBI building.
- Pedestrian, bicycle, and vehicular circulation, including parking, caused by the projected redevelopment scenario(s) of the site.
- Metrorail accessibility and capacity.

<u>Urban Design</u> - The PADC Plan contains a set of general development objectives and guidelines for 23 parcels along the north side of Pennsylvania Avenue, including the FBI site. In addition, individual square guidelines were developed to support the PADC Plan objectives and further articulate building envelopes and development patterns for each parcel. However, square guidelines were not developed for the FBI site since construction of the J. Edgar Hoover Building took place concurrently with the development of the PADC Plan. Of note, the Plan does state that the FBI site generally meets the intent of the guidelines.

To ensure that the future redevelopment of the FBI site complies with the PADC Plan; is compatible with surrounding buildings and uses, particularly the relationship to buildings within the Federal Triangle; and advances the recommendations of the Monumental Core Framework Plan, the EIS should analyze the impacts of each potential development scenario according to an urban design framework that considers:

- Building setbacks and upper-story setbacks.
- Building heights and street wall relationships.
- D Street right-of-way between 9th and 10th Streets.
- Retail and cultural opportunities to generate ground floor and street-level activities.
- Streetscape design
- Composition of buildings and streetscape that strengthens the visual axis and physical connection between the U.S. Capitol and the White House.

Furthermore, NCPC recommends that assumptions made in the EIS analysis with regard to the items listed above should be included as required mitigation in the Recordation of Decision, and incorporated into a set of square guidelines to help guide future redevelopment of the FBI site.

<u>Environmental Stewardship</u> – The EIS should analyze the potential environmental impacts on the following resources, infrastructure systems, and environmental conditions:

- Vegetation and tree coverage, protection, and health.
- Stormwater runoff and green infrastructure.
- Extreme weather events and climate adaptation.

<u>Security</u> – The EIS should analyze the impact of the proposed redevelopment on the security of surrounding developments and special events along the avenue, such as the Presidential Inaugural Parade.

<u>Cultural and historic resources and character</u> - We understand that GSA prepared a determination of eligibility for the J. Edgar Hoover Building and that the District of Columbia State Historic Preservation Officer concurred with the findings of the report that the building is not eligible for the National Register of Historic Places. Though the J. Edgar Hoover Building is not a historic property, it is located within the boundary of the Pennsylvania Avenue National Historic Site, and therefore redevelopment of the FBI site could have impacts on this protected area. In addition, the redevelopment of the FBI site may provide an opportunity to restore portions of historic L'Enfant Plan streets.

NCPC has recently begun work with GSA and NPS on the Pennsylvania Avenue Initiative to study the near- and long-term needs of the Avenue and surrounding neighborhoods, identify a governance framework, and develop a vision for how Pennsylvania Avenue can meet local and national needs. As part of the work on the initiative, NPS is preparing a Cultural Landscape Inventory for Pennsylvania Avenue that will assist with identifying significant features of the landscape that GSA should consider as plans for the redevelopment of the FBI site move forward.

Therefore, the EIS should fully analyze the potential impacts on the following:

- The effect of the height, mass, scale, and building material of proposed buildings on the Pennsylvania Avenue National Historic Site, L'Enfant Plan, and adjacent historic buildings and historic districts.
- Significance of the landscape/streetscape elements of Pennsylvania Avenue as it reflects potentially significant design and planning of the PADC.
- Restoration and re-establishment of L'Enfant Plan streets and rights-of-way.

Campus Acquisition and Consolidation Alternatives

Three alternative locations are proposed for the potential relocation and consolidation of the FBI Headquarters. Two sites are located in Prince George's County, Maryland (Greenbelt and Landover) and one in Fairfax County, Virginia (Springfield). In addition to the topic areas already identified by GSA, NCPC requests that the EIS analyze potential impacts associated with transportation, campus design, environmental stewardship, and security.

<u>Transportation</u>, <u>traffic and parking</u> – The development of a new campus has the potential to have impacts on the surrounding transportation network, including bicycle and pedestrian circulation, vehicular levels of service at peak and off peak hours, and parking. Therefore, the EIS should analyze potential impacts to the following:

- Pedestrian and bicycle circulation caused by the demolition of existing development and construction of the new consolidated campus.
- Vehicular traffic, congestion, and levels of service on the surrounding transportation road network, and on available parking.
- Metrorail and commuter rail accessibility and capacity.

<u>Environmental Stewardship</u> – The EIS should analyze the potential impacts on the following resources, infrastructure systems, and environmental conditions:

- Vegetation and tree coverage protection, health and replacement.
- Stormwater runoff and green infrastructure.
- Ability to meet goals in Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, to reduce greenhouse gas emissions and increase water and energy efficiency.
- Ability to meet goals of Executive Order 13653, Preparing the United States for Climate Change, to address risks associated with short-term and long-term extreme weather and climate change impacts.

<u>Campus Design</u> - The EIS should analyze the alternative campus development plans to assess the following:

- Vehicular, bicycle, transit and pedestrian access to, around, and through the interior and exterior of the campus.
- Campus site plan and building design that relates and establishes a positive presence with the community, and is compatible with surrounding uses and developments.
- Compact development and the integration of uses that accommodate the need for secure federal office space and operations while also incorporating public uses that contribute to the surrounding community.
- The impacts on surrounding public space, particularly those caused by physical perimeter security.

We look forward to continued coordination with GSA, and other interested stakeholders, on the effort to relocate and consolidate the FBI facilities into a sustainable and efficient campus, and to ensure redevelopment of the existing FBI Headquarters site advances the goals of the PADC Plan, the Comprehensive Plan for the National Capital, and the guidance in the Monumental Core Framework Plan.

If you have any questions regarding our comments, please contact Ken Walton, at (202) 482-7261 or ken@ncpc.gov.

Sincerely,

Shane L. Dettman,

Director, Urban Design and Plan Review Division

NVR MS CAVALIER GREENBELT LLC 11700 Plaza America Drive, Suite 330 Reston, Virginia 20190

September 23, 2014

VIA EMAIL AND MAIL

General Services Administration 301 7th Street SW., Room 4004 Washington, DC 20407 Attention: Nia Francis, Project Manager fbiheadquarters@gsa.gov

Re: NEPA Scoping Comment for New FBI Headquarters

Dear Ms. Francis:

NVR MS Cavalier Greenbelt LLC is the owner of the Greenbelt Station residential community that is under development directly to the south of the proposed FBI Headquarters at Greenbelt Station. I am writing to provide our perspective on the environmental impact of the proposed facility.

Our residential community is currently under development with 499 townhomes and condominiums as well as 302 rental apartments. We are pleased that Greenbelt Station's first new residents were able to move into their homes in 2014. We are very excited to be part of creating a new community proximate to the Metro and MARC station as well as all the amenities offered in the City of Greenbelt and the surrounding area.

Our development in the "South Core" portion of the Greenbelt Station property shares many of its development approvals with the "North Core" property, in which Renard Development LLC proposes to construct the new FBI Headquarters. As a result, we are intimately familiar with the careful planning and consideration that the City of Greenbelt, Prince George's County and various other governmental agencies utilized in evaluating and approving the projects' development plans.

We believe that the FBI Headquarters would be beneficial to the socioeconomic and physical environment surrounding the property and would enable enhancements to public services.

The new FBI headquarters would contribute significant benefits to the socioeconomic conditions in the area. Up to this point, Prince George's County has not shared in the benefits of GSA leases to the extent of other areas in the Washington Capital Region. The FBI headquarters would serve as a nexus of increased economic opportunity for the cities of Greenbelt, Berwyn Heights and College Park as well as the greater Prince George's County area. The headquarters would enable additional development within the North Core property with a variety of commercial

endeavors. The overall development of the North Core would provide significant socioeconomic benefit to the future residents of our Greenbelt Station residential community in the form of increased employment opportunities in a location that would often be walkable from their homes. The secondary effects of further economic expansion in the surrounding area would provide additional benefit to our future residents as well as the entire area.

Renard Development's proposed plan for the FBI facility would benefit the physical environment. The overall Greenbelt Station development plan incorporates significant enhancements to the road network surrounding the property. The traffic flow when the property is fully constructed will be fully mitigated in comparison to current conditions and likely enhanced. The convenience of access by Metro or MARC along with a newly constructed I-95/495 interchange should mitigate adverse air quality impacts and effectively eliminate any noise issues. The development of the site has also been designed to improve storm water treatment in comparison to the current parking facility for the Metro and MARC station, and the approved plans have given careful consideration to ensuring that the natural environment is protected in all other facets of the development.

The relocation of the FBI Headquarters to Greenbelt Station would also improve public services in the area surrounding the site. The increased commercial tax revenue from the development of the site would enable the City of Greenbelt to enhance public services throughout the City. Furthermore, the development of the North Core will include significant enhancements to the Metro and MARC station on the site, increasing its utility for residents of the surrounding area by enhancing the amenities available at the station.

In summary, as the owners of the residential community directly adjacent to the proposed facility, both for ourselves and as stewards for our future residents, we are strongly supportive of the proposed FBI Headquarters at Greenbelt Station.

Sincerely,

NVR MS CAVALIER GREENBELT, LLC

Don M. Carroll, Authorized Signatory



PRINCE GEORGE'S COUNTY GOVERNMENT OFFICE OF THE COUNTY EXECUTIVE

October 22, 2014

Mr. Dan Tangherlini Administrator U.S. General Services Administration 1800 F Street, NW Washington, D.C. 20405

> Re: Prince George's County's Letter of Support Relocation/Consolidation of FBI Headquarters

Dear Mr. Tangherlini:

Please accept this letter as indication of our enthusiastic support for the Landover and Greenbelt sites for the placement of the new consolidated headquarters for the Federal Bureau of Investigation (FBI). Prince George's County by far has the two superior sites for the FBI's new home. Along with the State of Maryland, Prince George's County is totally committed to providing the necessary financial and infrastructure support for moving forward.

There are a number of key attributes that make Prince George's County the natural choice for the new FBI headquarters. Each site offers the U.S. taxpayer tremendous value and cost savings while providing the FBI with safe, high quality, state of the art facilities from which it can meet its pressing responsibilities to protect our citizens from threats both in this Country and overseas. Each site offers a strategic location with immediate adjacency to the District of Columbia and Northern Virginia. While our two sites are different in specific criteria, they each possess unique attributes that provide clear advantages over any other option. Both teams have proposed a federal campus that meets every applicable federal site requirement, including all security mandates and environmental issues.

Both sites can create an amenity-filled mixed-use employment center, with outstanding access to multiple transit and transportation modes. The Greenbelt and Landover sites can easily accommodate 2.1 million square feet and will create significant economic vibrancy. Consistent with federal guidelines for this project, both Greenbelt and Landover deliver the opportunity for Transit Oriented Development (TOD) that can increase ridership on Metro and alleviate congestion on our major roadways.

That last issue also relates to the issue of equity for Prince George's County and federal office space placement. More than 25% of the region's federal employees live in Prince George's County, but less than 4% of all of the leased federal office space in the region is

Mr. Dan Tangherlini October 22, 2014 Page 2

located here. An estimated 40% of FBI employees already live in Maryland, and would be well served by a Prince George's County location. While this County is home to approximately 75,000 federal employees, only 25,000 federal jobs are located here. The FBI would dramatically improve that equation.

We will commit all appropriate County resources to support a decision to locate the FBI in Prince George's County. That will include utilizing a new regulatory procedure enacted specifically to expedite the review and permitting process for TOD projects, dramatically shortening the normal review time, reducing costs, providing predictability and certainty to the development community.

Those factors clearly demonstrate that Prince George's County has the best sites and can support the headquarters of this major federal agency. Placement of the FBI headquarters will bring balance to the region's economic development base. I, along with our Governor, State and Federal delegations and a host of local elected officials are united in support of bringing the FBI to Prince George's County and the State of Maryland.

We strongly reiterate our support for these sites and pledge to work with the respective development teams to ensure that they remain competitive throughout this process. Locating FBI in Prince George's County is a good deal for the FBI and the American taxpayer. Thank you in advance for your consideration.

Sincerely,

Rushern L. Baker, III

County Executive

cc: The Honorable Martin O'Malley, Governor, State of Maryland

The Honorable Anthony Brown, Lt. Governor, State of Maryland

The Honorable Barbara Mikulski, U.S. Senator for Maryland

The Honorable Benjamin Cardin, U.S. Senator for Maryland

The Honorable Steny Hoyer, U.S. Representative for Maryland

The Honorable Donna Edwards, U.S. Representative for Maryland

The Honorable Douglas Peters, Chair, Prince George's Senate Delegation

The Honorable Jolene Ivey, Chair, Prince George's House Delegation

The Honorable Mel Franklin, Chairman, County Council

Nicholas Majett, Chief Administrative Officer

Glenda Wilson, Chief of Staff

Nia Francis, Project Manager, GSA

Postmerhed 10/23///

QUANTUM COMPANY

4912 Del Ray Avenue Bethesda, Maryland 20814 (301) 657-9900 ext.129 Fax (301) 657-8412 Cell (703) 615-7011

October 22, 2014

fbiheadquarters@gsa.gov, fbi-hq-consolidation@gsa.gov and US Mail

Nia Francis, Project Manager, and Mina Wright, Director, Office of Planning and Design Quality National Capitol Region Public Buildings Service General Services Administration 301 7th Street, SW, Room 4004 Washington, DC 20407

Re:

NEPA Scoping Comment

Proposed FBI Headquarters Consolidation

Greenbelt Site/Letter of Support

Dear Ms. Francis and Ms. Wright:

This is submitted for your consideration by Quantum Company, management and leasing agent ("Quantum") on behalf of GB Mall Limited Partnership ("GB Mall"), the owner of the Beltway Plaza Shopping Center, 6000 Greenbelt Road, Greenbelt, Maryland 20770 ("Beltway Plaza").

Background. Beltway Plaza is a neighborhood/regional shopping center, consisting of approximately 825,000 square feet of gross floor area. Beltway Plaza is sited on approximately 64 acres of ground. Beltway Plaza is in close proximity and a pleasant stroll to the Greenbelt Metro Station. Originally developed in the 1960's as a strip center with a supermarket and a 300,000 square foot department store, Beltway Plaza has been constantly improved and reinvested in over the ensuing more than 50 years. Millions of Dollars have been invested in Beltway Plaza by its current owners. Beltway Plaza includes a flagship Giant Food store, Target, TJ Maxx, Marshalls, Burlington Coat Factory, Jo-Ann's Fabrics, Planet Fitness, Silver Diner, McDonald's, Subway, Jersey Mikes, Joe's Crab Shack and a hundred additional stores and restaurants. See www.beltwayplazamall.com for a complete Directory and store and restaurant listing.

Suffice it to say that Beltway Plaza is committed to service to the community, as it has established a niche for itself as a family-friendly, value-oriented, discount shopping center with modern entertainment amenities such as the state-of-the-art Academy 8 Stadium Theaters. All of the necessities of a local community center are offered at Beltway Plaza, including a supermarket, a dry cleaners, a laundromat, a cobbler, a tailor, a drug store, a book store, a hardware store, a liquor store, various professional services, a barber, a hair salon, a watch repair shop, several banks, opticians and optometrists and a number of restaurants.

GSA/FBI Headquarters Consolidation October 22, 2014 Page 2

Special events and family-oriented programs are held on a weekly basis at Beltway Plaza. For example, next week, Beltway Plaza is hosting a Pumpkin Fun Event for Kids and indoor Trick or Treating and Costume Contests for families to celebrate Halloween in a safe, secure environment, supervised by shopping center security.

Greenbelt Station is the Most Qualified Site

<u>Unified Support</u>. As you well know from the letters of support, the comments received at the Greenbelt scoping session and the public pronouncements of the City of Greenbelt, Prince George's County, surrounding cities and counties and State and Federal officials of the State of Maryland, Greenbelt is the strongly preferred site for any number of reasons.

<u>Environmental Factors</u>. Spearheaded by the Greenbelt City Council and its professional Planning and Community Development Department, the plans for the development of the Greenbelt site have given exhaustive and careful consideration to ensuring that the natural environment is protected during all phases of the development. As an example, planned development of the site will actually improve storm water treatment as compared to the existing expanse of impervious surfaces.

Transit and Transportation. The Greenbelt Stations site delivers, among other things:

- * true transit-oriented development via Metrorail, Metro Bus, MARC train;
- * pedestrian connectivity to vital components of the surrounding community; and
- * a road network Federal, State, County and City to be further enhanced by the developer.

<u>Educational Support</u>. The Greenbelt Station site is located a mere 10 minutes from the University of Maryland and 20 minutes rom Bowie State University, both institutions among the finest universities in the region.

Economic Development Opportunity. The consolidated FBI headquarters represents a "game changer" for the economic development of the North Core of Greenbelt Station, assured continued residential development of the South Core of Greenbelt Station, a catalyst for the redevelopment of adjacent properties Beltway Plaza and Franklin Park at Greenbelt Station as well as a precipitating event for employment growth in the entirety of Northern Prince George's County.

Ready to Go. Greenbelt Station represents the greatest speed to development of any site under consideration, thanks to a dedicated, well-assembled development team, smart growth planning, existing approvals, project-focused zoning and significant City, County, State and Federal project support to ensure an orderly and efficient development approval process.

GSA/FBI Headquarters Consolidation October 22, 2014 Page 3

<u>Convenient to the Community</u>. Greenbelt Station is convenient to residential communities in Greenbelt, College Park, Berwyn Heights, New Carrollton and unincorporated Prince George's County, offering every imaginable type of employee housing. Within a stone's throw of Greenbelt Station is the Beltway Plaza and other shopping centers, miles of biking and hiking trails, acres of parks and public recreation, community centers, the Capital Office Park, the Federal Courthouse and NASA.

Open Arms. The community surrounding Greenbelt Station welcomes the FBI Headquarters relocation with open arms and a pure heart. As you will come to appreciate about our community, integrity, transparency and a profound truthfulness are the watchwords of our leaders and of our residents. We respect the FBI, its mission and its dedication to duty and want the FBI and its employees to relocate to and join our community, for the mutual benefit of all concerned.

GB Mall, the owners of Beltway Plaza, strongly endorse the plans of Renard Development LLC and the location of the consolidated headquarters of the FBI at the Greenbelt Station site, the most eligible site you are considering. We are looking forward to your decision.

Respectfully yours,

Marc "Kap" Kapastin, General Counsel

The Springfield VA campus is hands-down the optimal site for the FBI's new headquarters. While all three proposed sites (Greenbelt, Landover & Springfield) meet - to varying degrees - the general GSA requirements of site size, close proximity to the metro and the Beltway, etc. – it is only the Springfield VA site that can provide a cost savings realized during the course of daily business which the other two Maryland sites cannot. Primarily the Springfield campus will provide the FBI with the following time savings (cost) benefits realized during the course of business that will be reaped on a daily basis:

- Of the 3 sites, the Springfield, VA campus is half-way for both VA (western/northern) & MDresident based FBI employees and is overall a closer commute for S.VA-resident (ie, Woodbridge
 and south) employees. Selecting the Springfield campus will result in less VA-resident employee
 loss (less job and knowledge flight) than if HQs is relocated to either MD sites
- If either MD site is selected, the FBI will lose many VA-resident employees due to the severe time burdens of commuting into MD via I-95 and up through the 495-beltway.
- Morning and evening commutes for both VA & MD-resident employees are in the opposite
 direction of rush hour traffic flow (495-S and 395-S in the AM; 495-N & 395N in the PM) which
 can positively impact employee schedules and reduce unintended leave, tardiness and/or
 absences.
- Springfield will be a faster commute for a larger <u>majority</u> of VA and MD-resident employees as opposed to relocating to Greenbelt or Landover, MD, which will result in a faster commute for <u>only MD-resident FBI employee</u> (not for an overall majority of HQs employees).
- Springfield campus is the optimal and closer site to the FBI's Quantico facility, the ODNI's
 National Counterterrorism Center (NCTC) in McLean, VA; the Terrorist Screening Center in
 Vienna, VA; DHS, National Cyber Center, the White House, the Dept. of Justice, Depart. of State,
 and Congress. National Security collaboration, critical executive-level briefings, etc. as well as
 FBI enterprise collaboration efficiencies will increase (less impacted vs a HQs location in MD)
 and commuting/travel time and costs will be less than the MD locations by virtue of the close
 proximity of Springfield to these critical venues.

In addition, both proposed Maryland locations have high, violent crime rates and unnecessarily expose FBI employees to risk of violent crime and victimization. However, Springfield's crime rate is very low - 2/3^{rds} below the national average. (The 2012 U.S. national crime average for murder, rapes, robberies, assaults, etc. is 301.1. The 2012 crime rate for Springfield VA is 99.2 or 2/3^{rds} below the national average. However, the 2012 crime rates in both Greenbelt (382.4) and Landover (322.7) are very high and well over the national average.) See: http://www.city-data.com/crime/crime-Greenbelt-Maryland.html

If either MD site is chosen as FBI headquarters, cost of force/employee protection will increase. And, the risk of crime at either MD location can negatively affect employee morale and negatively impact attracting new, safety conscious employees and/or retaining employees concerned for their physical safety/welfare.

FBI HEADQUARTERS CONSOLIDATION ENVIRONMENTAL IMPACT STATEMENT SCOPING COMMENT

Bernard H. Berne Arlington, Virginia

Please consider the comment below during the scoping process for the Environmental Impact Statement (EIS) for the Consolidated Federal Bureau of Investigation (FBI) Headquarters.

Introduction

The General Services Administration (GSA) and the FBI appear to be violating a federal Executive Order and GSA's own regulations that require these agencies to locate the FBI Headquarters at a site that is different from the any of the three sites that GSA is presently considering. This comment describes these requirements and suggests methods by which GSA and the FBI can comply with them.

The draft EIS needs to address these requirements and the means by which GSA and the FBI will comply with them. If GSA is unable to do this in the draft EIS, GSA should initiate a new scoping process for an EIS that will evaluate one or more potential sites for the FBI headquarters that GSA is not presently considering.

Legal Requirements for the Location of Federal Facilities in Urban Areas

President Jimmy Carter's Executive Order 12072 (Federal Space Management), August 16, 1978 (43 FR 36869) (at http://www.gsa.gov/portal/content/101580), which is still in effect and which federal courts have found to have the force of law, states:

- 1-101. Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Such Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities."
- 1-103. Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials.
- 1-301: The heads of Executive agencies shall cooperate with the Administrator in implementing the policies of this Order and shall economize on their use of space.

President Bill Clinton's Executive Order 13006 (Locating Federal Facilities on Historic Properties in our Nation's Central Cities) (at http://www.gsa.gov/portal/content/100842) states:

"Section 1. Statement of Policy.

Through the Administration's community empowerment initiatives, the Federal Government has undertaken various efforts to revitalize our central cities, which have historically served as the centers for

growth and commerce in our metropolitan areas. Accordingly, the Administration hereby reaffirms the commitment set forth in Executive Order No. 12072 to strengthen our Nation's cities by encouraging the location of Federal facilities in our central cities."

41 CFR 101-17.002 (Basic policy) (at http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/pdf/CFR-2000-title41-vol2-pdf) implements Executive Order 12072. This section of the CFR states:

...... GSA has oversight responsibility for Federal agency compliance with Executive Order 12072, including space acquisition in urban areas accomplished under authority other than the Federal Property and Administrative Services Act of 1949, as amended. As required by section 901(b) of the Agriculture Act of 1970, 84 Stat. 1383, as amended by section 601 of the Rural Development Act of 1972, 86 Stat. 674 (42 U.S.C. 1322(b)), it is the responsibility of each agency to determine which of its new offices should be located in rural areas. When it is determined that agency space needs require an urban location, GSA and other Federal agencies shall be governed by the following policies for the assignment, reassignment, and use of buildings and space.

- (a) Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities.
- (b) Serious consideration shall be given to the impact that a location or relocation will have on improving the social, economic, environmental, and cultural conditions of the communities in an urban area. To the extent feasible, plans and programs for meeting space needs shall enhance and support the development, redevelopment, and revitalization objectives and priorities of cities in urban areas and shall enhance and support the employment and economic base of these cities. Both positive and negative impacts of space acquisition actions shall be weighed with the objective of obtaining maximum socioeconomic benefits from these actions.
- (c) In meeting space needs in urban areas:
- (1) First consideration shall be given to a centralized business area and adjacent areas of similar character in the central city of Standard Metropolitan Statistical Areas (SMSA) defined by the Department of Commerce publication (Government Printing Office Stock Number 041-001-00101-8), including other specific areas of a city recommended by the elected chief executive officer of the local government or a designee, except where this type of consideration is otherwise prohibited.

National Capital Planning Commission Recommendations for the Locations of Federal Facilities within the National Capital Region

The Federal Elements section of the National Capital Planning Commission's Comprehensive Plan, updated in 2002 (at

http://www.ncpc.gov/DocumentDepot/Publications/CompPlan/CompPlanPartTwo FedWorkplace.pdf) states on page 40 in its "Policies" section:

The federal government should:

- 1. Achieve within the District of Columbia a relative share of the region's federal employment (civilian and military) that is not less than 60 percent of the region's.
- Locate employees near other federal agencies and departments with which they regularly interact.
- 3. Locate federal workplaces in urban areas, giving first consideration to the District of Columbia and second consideration to other centralized community business areas and areas of similar character, including other specific areas that may be recommended by local agencies, with the following exception:
- Workplaces that have specific land use requirements (including the need for large amounts of land, buffers, and extensive future expansion needs) should locate where these requirements can be fulfilled.

The Federal Elements section contains a table and chart on page 20 that show that 193,835 (53.5%) of the National Capital Region's 362,811 civilian and military federal employees worked in the District of Columbia in 2002. Trends illustrated in the chart do not suggest that the percentage of federal employees working in the District of Columbia relative to those working in the entire region have achieved the 60 percent goal at present.

Legal Requirements for Locating Federal Facilities within the National Capital Region

41 CFR 17.033-33 (http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/xml/CFR-2000-title41-vol2-sec101-17-003-33.xml) defines an "urban area" as: ... any Standard Metropolitan Statistical Area (SMSA) as defined by the Department of Commerce and any non-SMSA that meets one of the following criteria:

41 CFR 17.033-35 (http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/xml/CFR-2000-title41-vol2-sec101-17-003-35.xml) defines a "central city" as: any city whose name appears in the title of an SMSA. Criteria for determining SMSA titles are established by the Department of Commerce.

OMB Bulletin No. 13-01, Feb. 28, 2013, at

www.whitehouse.gov/sites/default/files/omb/bulletins/2013/b-13-01.pdf , states that the principal cities in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area are Washington, DC; Arlington, VA; Alexandria, VA; Silver Spring, MD; Frederick, MD; Rockville, MD; Bethesda, MD; Gaithersburg, MD; and Reston, VA (see page 51 in the appendix to OMB Bulletin No. 13-01, Feb. 28, 2013).

Therefore, Executive Orders 12072 and 17003, as well as 41 CFR 101-17.002, require GSA and the FBI to locate the Consolidated FBI headquarters within Washington, D.C. or another of the above principal cities, with certain exceptions that are not relevant to the FBI headquarters. Further, the National Capital Planning Commission's Comprehensive Plan contains policies that encourage GSA and the FBI to locate the facility within District of Columbia, rather than in Maryland or Virginia.

GSA has narrowed its list for the Consolidated FBI Headquarters to specific sites in (1) Greenbelt, Maryland, (2) Landover, Maryland, and (3) Springfield, Virginia. Greenbelt, Maryland, is a city within the Washington-Arlington-Alexandria, D-C-VA-MD-WV Metropolitan Statistical Area. However, Greenbelt is not one of the principal cities within that Area (see page 51 in the appendix to OMB Bulletin No. 13-01, Feb. 28, 2013). Greenbelt is a "noncentral city" within that Area.

41 CFR 101-17.002(c)(3) states: "If location outside the central city is required, preference shall be given to locations in the central business area of noncentral cities". Thus, GSA can only select a site in Greenbelt if the GSA or the FBI requires that the consolidated FBI headquarters be located outside of Washington, D.C. and all other "principal cities" in the Statistical Metropolitan Area that contains these cities. Neither the GSA nor the FBI has established any such requirement.

Landover, Maryland, and Springfield, Virginia, are not incorporated entities. Sites within these areas are therefore not within cities. Executive Order 12072 and 41 CFR 101-17.002 contain no provisions that permit the FBI headquarters to be located within either Landover or Springfield. Executive Order 12072 and 41 CFR 101-17.002 therefore require GSA to eliminate the Landover and Springfield sites from consideration before the site selection process proceeds any further. The EIS should state that GSA has removed sites in Landover and Springfield from consideration because of requirements in Executive Order 12072, as codified in 41 CFR 101-17.002, et seq.

GSA's considerations of sites in Landover and Springfield , rather than an area that is within a city, are in clear violations of Executive Order 12072 and 41 CFR 101-17.002. Both of these documents state: "Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Such Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities."

"Shall" means "must". There are no exceptions to this.

An FBI headquarters facility in either Landover or Springfield will not serve to strengthen any city or make any city an attractive place to live and work. Instead, the facility would draw FBI employees and contractors and other businesses and residents out of Washington, D.C., thus weakening one of the urban areas central cities. This is especially true because FBI's headquarters is presently located in Washington, D.C.

It is also important to recognize that the relocation of FBI employees from D.C. to Maryland or Virginia would be in direct opposition to the National Capital Planning Commission's goal increase the percentage of federal employees in D.C. relative to the percentage in the entire National Capital Region.

Executive Order 12072 states: "Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials." The FBI headquarters is presently located in the Central Business District (CBD) of Washington, D.C.

The proposed new FBI headquarters must also be located in that city's CBD unless District of Columbia officials have recommended another specific area within Washington, D.C. for the facility. D.C. officials have already recommended to GSA one such area: Poplar Point. However, there are other sites in Washington, D.C. that may be able to accommodate the consolidated FBI headquarters.

Potential Sites for the Consolidated FBI Headquarters in Washington, D.C.:

Poplar Point and St. Elizabeths Hospital, West Campus:

Officials of the District of Columbia have specifically recommended that the Consolidated FBI Headquarters be located within a site at Poplar Point in Southeast Washington, D.C. According to a Washington Post article dated December 5, 2013, and entitled "D.C. official says GSA criteria renders District "effectively ineligible" to retain FBI HQ" (at http://www.washingtonpost.com/business/capitalbusiness/dc-official-says-gsa-criteria-renders-district-effectively-ineligible-to-retain-fbi-hq/2013/12/05/1f72b0a4-5c46-11e3-be07-006c776266ed story.html), a District of Columbia Deputy Mayor, Victor Hoskins, stated in a November 26, 2013, letter to GSA:

".... although Poplar Point has 110 acres, 70 acres there are required by federal law to be preserved as open space, meaning the site is likely too small under the GSA's guidelines. Second, the GSA said it preferred not to relocate the FBI to "sites on which the development of a FBI Headquarters would significantly disturb natural resources (e.g., wetlands and floodplains)" or otherwise negatively affect "the quality of the human and natural environment" in ways that could not otherwise be mitigated."

However, Executive Order 12072 requires GSA to locate the FBI Headquarters in the Washington, D.C. or another central city (i.e., principal city). GSA must therefore either reduce its space requirements for the facility to enable the facility to be located at Poplar Point or select another site in a principal city, such as Washington, D.C.

Legal requirement to economize on the use of space

Executive Order 12072 requires the Director of the FBI and the Administrator of General Services to reduce their space requirements if necessary this by stating in Section 1-301: "The heads of Executive agencies shall cooperate with the Administrator in implementing the policies of this Order and shall economize on their use of space." It presently appears that the GSA Administrator and the FBI Director are failing to sufficiently "economize on their use of space" so that they may locate the FBI headquarters within the 40 acres available for that facility at Poplar Point.

GSA can therefore locate the FBI headquarters at Poplar Point if GSA and the FBI reduce their space requirements to the extent necessary for the facility to comply with Executive Order 12072. GSA accomplish this by making plans for a facility that has more density and/or greater heights than would the facility that GSA is presently planning for Greenbelt, Landover or Springfield.

Mitigation of Adverse Environmental Impacts at Poplar Point

As noted above, GSA has reportedly stated that construction of the FBI headquarters at Poplar Point would significantly disturb wetlands and floodplains. However, GSA can mitigate these disturbances by either making appropriate plans for the headquarters to minimize such disturbances or by acquiring and/or creating wetlands and floodplains in other locations within the United States, preferably within the National Capital Region. It is therefore clear that GSA can indeed mitigate these environmental disturbances, regardless of any statements that GSA may have previously made to the contrary.

St. Elizabeths Hospital, West Campus, Site

The FBI can divide its facility into more than one component if insufficient space is available for an FDA headquarters at Poplar Point. GSA can locate the remaining facilities nearby, giving particular attention

to the site proposed for the headquarters of the U.S. Department of Homeland Security (DHS) on the west campus of St. Elizabeths Hospital.

The St. Elizabeths Hospital West Campus is less than two miles away from Poplar Point. Further, it presently appears that DHS will not have the funds available to fully utilize the St. Elizabeths west campus within the foreseeable future.

GSA therefore needs to work with DHS to determine whether part or all of the FBI Headquarters can be located at St. Elizabeth's campus if the Poplar Point site is too small to accommodate the facility. As the FBI and DHS have similar security requirements and overlapping missions, both agencies would benefit if part or all of the FBI headquarters is located within the St. Elizabeth west campus.

Other Potential Sites in Washington, D.C.:

If GSA and the FBI find that it is not feasible to utilize Poplar Point and/or the St. Elizabeths Hospital West Campus for the Consolidated FBI Headquarter, GSA must comply with Executive Order 12072 by asking D.C. officials to recommend another site within Washington, D.C., that is suitable for the facility. It presently appears that the former campus of the Walter Reed Army Medical Center in Northwest D.C. can accommodate the FBI Headquarters, as might the McMillan Reservoir Sand Filtration Site in Northwest D.C., and the former Coast Guard headquarters at Buzzard Point in Southeast D.C. While the D.C. government has not yet proposed either of these sites for the FBI headquarters, GSA needs to evaluate them unless the District of Columbia government specifically rejects them.

If GSA can find no new sites (including privately-owned sites) within Washington, D.C. or another principal city on which to construct the FBI Headquarters, GSA or the FBI must renovate the present FBI Headquarters in Washington's CBD or construct a new facility at that site in order to conform to the requirements of Executive Order 12072. The new facility can be taller or denser than the present building, providing that the facility conforms to the requirements of the federal Height of Buildings Act of 1910, as amended and that the National Capital Planning Commission approves the project.

Summary:

Executive Order 12072 and 41 CFR 101-17.002 require GSA to locate the FBI headquarters in Washington, D.C., rather than in unincorporated areas such as Landover or Springfield. GSA can only select a site in the City of Greenbelt, Maryland, if the FBI and the GSA require that the facility be located outside of Washington, D.C. and every other principal city in the Statistical Metropolitan Area that contains these cities. This is a legal requirement, not an option.

National Capital Planning Commission policies also encourage federal employment in the District of Columbia, rather than in Maryland and Virginia.

GSA and the FBI must therefore revise their space requirements for the Consolidated FBI Headquarters to permit the facility to be constructed at Poplar Point or to identify a new site in Washington, D.C. that can accommodate part or all of the headquarters. These alternative sites include:

St. Elizabeths Hospital, West Campus

McMillan Reservoir Sand Filtration Site
Former Walter Reed Army Medical Center Site
Former Coast Guard Headquarters at Buzzard Point
Present FBI Headquarters Site
Privately owned sites offered for the facility in the past or in the future

The EIS needs to evaluate each of the above sites after GSA has entered into consultation with officials of the Government of the District of Columbia. The EIS should only evaluate the Greenbelt site if GSA and the FBI require that the facility be located outside of Washington, D.C. and all other principal cities in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area. The EIS should reject the Landover and Springfield site because of their non-conformance with Executive Order 12072 and GSA's implementing regulations in 41 CFR 17.002, et seq.

The FBI is the federal government's primary law enforcement agency. For that reason, it is critical that the FBI Director and the GSA Administrator comply with Executive Order 12072 when selecting a site for the FBI's headquarters. A law enforcement agency must itself comply with the law.

Thank you for your consideration.

Bernard H. Berne

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E-mail: bhberne@yahoo.com

Ms. Nia Francis
OPDQ Project Manager
U.S. General Services Administration
National Capitol Region
301 7th Street, SW
Room 4004
Washington DC 20407

RE: NEPA Scoping Comments FBI Headquarters Consolidation

Dear Ms. Francis:

Thank you for the opportunity to as part of the NEPA scoping process to comment on the potential alternatives for relocation of the FBI headquarters. My comments will primarily focus on the Greenbelt alternative.

Why is the federal government considering renting property when it already owns sufficient property on which to build the new FBI headquarters? This appears to be fiscally imprudent.

While impacts to residential areas are listed as the first issue of interest for the Springfield and Landover alternatives; the Greenbelt alternative failed to include impacts to residential areas as an area of interest. North College Park, located west of the railroad tracks, is a densely populated area (approx. 5,000 people per sq mile). The area was established as a transit oriented development in the early 1900s when trolley cars along the Washington Railway and Electric Company (Rhode Avenue line) is home to thousands of residents today. Additionally, the Al Huda school (K-12) which is located directly adjacent to Hollywood park was not shown in the depiction of the Greenbelt alternative. Please include North College ark and the Al Huda school in your assessment of impacts.

We are concerned that location of Level V Security buildings directly adjacent to CSX railroad tracks increases the potential for sabotage of the railroad and direct harm to our community. We are also concerned about increased risks of sabotage at the Greenbelt metro if the FBI headquarters is located there. Also of concern is that in the event of a threat in the DC area the Level V Building will go on lock down and that the lock down will result in traffic problems for motorists, cyclists and pedestrians who are utilizing the Greenbelt Metro station and 495 Beltway.

The need for a security buffer in an area that was purchased by the State of Maryland (\$10 million dollars) as a conservation area with public access is troublesome. First from a financial standpoint the tax payers of Maryland spent a significant amount of money to secure this property from the same company that is now asking to have one third of the property fenced off as a security buffer with no remuneration to the state. This area is important to residents and to the health of Indian Creek. Local groups access

this area not only to hike but to sample the water of the creek to monitor it. We request that explore a way to build at the Greenbelt location without closing off this environmentally sensitive property from public use.

The scoping document for the Greenbelt Alternative shows a huge security buffer to the east of the project yet does not distinguish a like buffer on the west, north and south of the project. No security buffer is shown on for the other two alternatives. Please explain the complete security buffer that will be necessary at all three alternatives.

We are concerned with location of a Level V site so close to our community and our schools. Please explain what measures will be undertaken to protect our community and our children.

A large portion of the Greenbelt Metro alternative appears to be located directly on wetland and floodplain. The current imperious footprint at the Greenbelt alternative will need to be expanded to accommodate the project. How can this alternative move forward without degrading and or destroying the wetland and floodplain?

Stormwater from North College drains into Narraganset Run and Indian Creek. How will homes located in College Park be protected from negative changes in drainage patterns and flooding if the Greenbelt alternative is constructed? Additionally we are concerned by plans of Renard to "reconstruct" Narragansett Run. Destruction of this wooded wetland to make it easier for development is not the environmental fix that is being touted.

A significant percentage of the population living in the Hollywood and Daniel's Park communities in College Park and individuals living in Franklin Park (formerly Springhill Lake) in Greenbelt are minorities that most likely have not been reached by the scoping process because English is not their native language or they are non-English speakers. Suggest formation of a community advisory committee to reach these individuals and to assist in the NEPA process.

Surprisingly prior to the choice of an alternative, design work is underway by the Maryland State Highway Administration (SHA) on widening the 495 Beltway to accommodate interchange ramps from the FBI at the Greenbelt alternative. The Draft EIS should encompass the same study area.

Transportation around the proposed Greenbelt alternative is a huge concern for residents. We are not at all convinced that only 3,000 of the 11,000 FBI employees will drive to work. We are concerned about this additional traffic and also the potential for FBI employees to take up commuter spots in the WMATA garage and to also park in adjacent neighborhoods. Please explain what safeguards will be taken to ensure the community is no overburdened by FBI traffic and parking outside the FBI garage.

Please explain the impact of FBI employees on the transfer points at L'Enfant Plaza, Gallery Place and Metro Center. While there may excess space on green line heading toward Greenbelt in the morning and away from Greenbelt in the evening, FBI employees who do not live along the green line will need to transfer at one of Metros already overburdened stops.

We are concerned about noise impacts both during construction and after project is completed. Our community already has the Beltway one side and the CSX tracks on the other. We request that daytime and nighttime noise levels be evaluated to ensure that our community will not be subjected to levels over the state standards or levels that make living in North College Park unbearable indoors or outdoors. Housing in North College Park consists of small single family homes built more than fifty years ago and without any noise buffers that some modern homes include. We ask that consideration be given to relocating the entrance roadway further east to reduce the direct impacts of the traffic on our community. We also request sound barriers be installed to buffer the noise that will reverberate into North College Park.

We are also concerned that the height of the proposed multi-use buildings constructed so close to our community will result in a huge reduction in the amount of natural light that makes its way into our community. Please assess the potential visual impacts from the complete project on North College Park.

The cumulative impacts at the Greenbelt alternative needs to include the mixed—use development that Renard Development Company states is an essential part of the project. Adding this mixed use component to an already restricted site will exponentially increase the negative impacts to the physical environment and to the communities located near the project.

Two historical properties of note in Daniel's Park are located in close proximity to the project area: the Baker-Holiday House at 5005 Huron Street and the Bowers-Sargent House at 9312 Rhode Island Ave. Additionally, the College Park Airport (National Register of historic places since 1977) one of the oldest airports in the country has been in continuous operation since 1909.

Please describe how if at all the projected project would impact the historical properties in Daniel's Park and the College Park Airport.

Mr. Beall has spoken to our civic association on a few occasions. He continues to try and sell us on this project however, he has not been actively engaged in listening to our concerns or working on measures to mitigate impacts. The one concession that was made was that buildings closest to the railroad tracks would be no more than 8 stories high. Mr. Beall has recently been saying unless the community wants them taller. Of course we do not, the scope of this project so close to our community is frightening. We are concerned that the character of our community will be lost along with our quality of life. For a neighborhood located so close to DC and 495 we have a very strong sense of community and properties that include yards and trees.

As the current President of the North College Park Citizens Association and a former City Council Member I am in touch with many people in our community and have a sense for the concerns expressed by many residents. It is unfortunate that our elected officials are all so engaged in vying for this project that they have not been listening to their constituents.

Thank you for your time and consideration.

Sincerely,

Christine Nagle

SUGGESTED AREA OF CONSIDERATION

20 October 2014

US General Service Administration Public Buildings Service 301 7th Street, SW, Suite 4004 Washington DC 20407

Dear Sirs:

I would like to submit a potential building site location for the new FBI Headquarters.

Please consider: Western Charles County, Maryland

Specifically: Indian Head Township

Attributes:

- 31 miles practically due South of Washington DC
- Existing four lane highway
- Across Potomac River from Quantico/Ft Belvoir areas
- Surrounded on two sides by waterways
- Small airport within 7 miles
- Several large land sites unoccupied
- Naval Base in Indian Head
- Small community atmosphere
- Revitalization of the area

I recently heard about the sites that GSA is considering and just felt the need to advertise my hometown area as an option.

I am a 65 year resident of Charles County Maryland. Thank you, any nod our way is appreciated.

Respectfully,

Frances P. Moody

31 Fairmont Pl, Indian Head, MD 20640

91

9526 Rhode Island Avenue College Park, MD 20740 October 23, 2014

Ms. Nia Francis OPDQ Project Manager U.S. General Services Administration National Capitol Region 301 7th Street, SW - Room 4004 Washington DC 20407

RE: NEPA Scoping Comments FBI Headquarters Consolidation

Dear Ms. Francis:

Thank you for allowing the public to comment on the potential alternatives for relocation of the FBI headquarters. I will comment on the Greenbelt location only as that is one that I am most familiar with.

I understand that impacts to residential areas are listed as the first issue of interest for the Springfield and Landover alternatives; however, the Greenbelt alternative failed to include impacts to residential areas as an area of interest.

I am a resident in North College Park, living in a neighborhood that will be impacted by this project. I believe that some neighborhood areas were left out of the plan.

Our neighborhood is concerned that location some building could possibly contribute harm to our community. Have considerations been made for potential lock downs and how they will affect those using the Metro system? Are there measures in place to protect our community including those attending the Al Huda School which is housed directly behind the tracks to the west?

Are you aware that the flood plain still exists and how will this affect not only building but how will you ensure that the environment will not be adversely affected by your construction? The current Metro station located in Greenbelt continues to be affected by the flood plain during rain storms where the tile flooring becomes quite wet at the water comes up from the ground.

I know that you will be receiving letters from others in my community with their concerns so I will not reiterate them at this time.

Thank you for listening to our neighborhood's concerns.

Ms. Nia Francis
OPDQ Project Manager
U.S. General Services Administration
National Capitol Region
301 7th Street, SW
Room 4004
Washington DC 20407

RE: NEPA Scoping Comments FBI Headquarters Consolidation

Dear Ms. Francis:

As a College Park resident, I am very concerned with the possible impacts the Greenbelt alternative for the FBI Headquarters may have on the northern part of the city. While such impacts were delineated for the Springfield and Landover projects, none were listed for the Greenbelt option, yet they will have significant effects on the quality of life of hundreds of College Park residents. Moreover, the Al-Huda School is directly adjacent to the Hollywood Park and likewise, it will suffer from the impacts.

As a previous resident in the West Bank area of the Middle East, I am particularly concerned that locating Level V Security buildings directly adjacent to CSX railroad tracks will make them a target of terrorism. In such a case, College Park residents as well as those traveling on the Beltway or using the Greenbelt Metro station will meet with traffic problems and could be caught in a life-threatening situation in the event of a lock down of the area.

As for the security buffer that is to be created, the environmental impacts are considerable since the land to be used for the buffer is property purchased by the state of Maryland as a conservation area. Moreover, it appears that much of the Greenbelt option is to be located directly on wetland and floodplain. How can that be justified? I also understand that Renard plans to "reconstruct" Narragansett Run. No such endeavor should be undertaken as it as it too will have negative environmental impacts.

Increased noise pollution will also come as part of this new development. The area closest to the CSX tracks already suffers from the din of the trains and Metro as well as from the Beltway traffic. In light of those facts, should this option be chosen, consideration should be given to relocating the entrance roadway further east to reduce the direct impacts of the traffic on the community. Sound barriers should also be installed to buffer the noise that will reverberate into North College Park.

The proposed height of the buildings are also of great concern. It will result in a considerable reduction in natural light which will negatively affect both human and plant life.

This option may seem like a very viable one, but the gross negative environmental impacts will have a such a huge detrimental effect on the residents' quality of life and property values that I foresee many wanting to leave the area. Finally, why should a community suffer so much when more reasonable options are available?

Respectfully,

Mary C. Cook 4705 Kiernan Rd. College Park, MD 20740 202-213-5579



Prince George's County, Maryland

October 23, 2014

Mr. Mark Gaither and Ms. Nia Francis Project Managers, FBI Headquarters Consolidation General Service Administration, Public Buildings Service 301 7th Street, SW, Suite 4004 Washington, DC 20407

Dear Mr. Gaither and Ms. Francis,

RE: Comments for the FBI HQ Consolidation Environmental Impact Statement

On behalf of the more than 1,000 members of the Prince George's Group of the Sierra Club, we appreciate the opportunity to provide the following suggestions and comments on issues to be taken into account in the Environmental Impact Statement (EIS) for the FBI headquarters consolidation project. The EIS should evaluate environmental impacts for the three finalist sites (Greenbelt Metro, MD; Landover Mall, MD; and GSA Franconia Warehouse Complex, VA) and a "No Action Alternative", using consistent criteria across all of the sites.

Our comments focus on environmental impacts in several dimensions – water quality, air quality/greenhouse gas emissions, energy use, quality of life, and environmental justice.

Water quality

- How much impervious surface, including parking, building footprints, access roads, and any additional interchanges to facilitate access, would be <u>added</u> to each site to accommodate the FBI complex? What would be the total final impervious surfaces of the complex at each of the alternative sites (existing plus new impervious surfaces)? Will the amount of impervious surface be <u>reduced</u> at any of the proposed sites?
- Will new construction associated with redevelopment of the two Maryland sites be subject to Maryland's new stormwater regulations? What stormwater regulations would apply to redevelopment at the Franconia/Springfield site? What can be done at each site to reduce runoff and increase infiltration, and at what cost?
- What would be the impact of runoff on water quality at each site, taking into account the amount of impervious surfaces and proposed mitigation measures?
- What, if any, disturbances will each site impose on existing wetlands and streams? How can such disturbances be prevented or mitigated?

Suite 102, 7338 Baltimore Ave. College Park, Maryland 20740 Telephone (301) 277-7111; Fax (301) 277-6699

Energy use, air quality, and greenhouse gases

- What will be the impact of FBI consolidation at each site on commuting patterns –
 specifically, the number of workers expected to take metro, buses, private cars, and other
 transport modes? On what basis are these patterns being predicted (a survey of employees?
 Some other technique?)
- What will be the impact of these new commuting patterns at each site on greenhouse gas emissions and other air pollutants, compared with the current situation?
- What can be done to ensure energy efficiency and use of renewable energy sources at each site? At which sites might solar or geothermal energy be used, for example, and to what extent? What will be the energy consumption of the final complex at each site, compared with the current situation?

Quality of life and environmental justice

- How will redevelopment of each site contribute to or detract from congestion and travel time on existing roads (for current and future users)?
- At each site, to what extent will the FBI office relocation be in proximity to existing or new retail and residential, and to mass transit, contributing to walkable communities that are less dependent on automobiles?
- In what ways will the FBI relocation enhance or detract from the quality of surrounding conservation areas at each site? Will it increase or reduce public access to green space?
- In what other ways will FBI relocation enhance or detract from the quality of life for people already living in proximity to each site?
- What are the Environmental Justice impacts associated with the selection of each site (per Executive Order 12898 and the Council on Environmental Quality's guidance)? Are there disproportionate adverse health and environmental impacts on specific low-income and minority communities? If so, how can they be mitigated?

Finally, we request that the EIS be fully transparent about the assumptions underlying all of the impact estimates and that the results be subjected to a sensitivity analysis (the sensitivity of results to more optimistic and pessimistic assumptions), to yield both an estimate and an upper and lower bound of the impacts.

mantra amounts

Martha Ainsworth, Chair

Prince George's Sierra Club Group on behalf of the PGSC Executive Committee



TOWN OF BERWYN HEIGHTS

MAYOR Cheye M. Calvo

5700 Berwyn Road Berwyn Heights, MD 20740 (301) 474-5000 Fax: (301) 474-5002 www.berwyn-heights.com

COUNCIL MEMBERS

Jodie A. Kulpa-Eddy (Mayor Pro Tem)
Patricia D. Dennison
Christopher J. Rasmussen
Anthony F. Schreiber

October 21, 2014

U.S. General Services Administration-NCR Public Buildings Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, DC 20407

Dear Ms. Francis:

On behalf of the Town of Berwyn Heights, please accept these comments regarding scoping considerations of the Environmental Impact Statement (EIS) to be conducted for the Federal Bureau of Investigation (FBI) Headquarters Consolidation Project. Berwyn Heights is a town with a population of approximately 3,200 residents located just to the south of the Greenbelt Metro site. We wholeheartedly support this project and would love to welcome the FBI Headquarters to our broader community.

We realize the Greenbelt Metro site will be selected only following a thorough review of the impact of such a project on the local level. Within the parameters of the EIS to be analyzed for this project, we are most concerned about the following factors:

Transportation, Traffic and Parking. We recognize there is a potential for increased automobile traffic along the Maryland state highways that border our northern (Route 193 Greenbelt Road) and eastern (Route 201 Kenilworth Avenue) boundaries. This was investigated in the past, in part to address our concerns regarding development of Greenbelt Station, the "South Core" of the mixed use transportation oriented zone, and as part of the Greenbelt Metro Area and MD 193 Corridor Sector Plan. We believe that, with certain mitigations (the construction of a full interchange with the Capital Beltway; a "diverging diamond" interchange at the intersections of Routes 193 and 201; and dedicated left turn lanes), this development can be managed in a manner that accommodates such an increase without overly interfering with our current transportation network. The walkability of the proposed Headquarters location, so close to the Greenbelt Metro station, undoubtedly will minimize the need for automobiles, and the location of Greenbelt Station directly on a relatively less-congested portion of the Beltway near Montgomery County and in-between I-95 North and the Baltimore-Washington Parkway makes it the best option for the greatest number

Ms. Nia Francis October 21, 2014 Page 2

of FBI employees who must drive to work. We hope these factors will be taken into account in the EIS.

- Hazardous Materials/Public Health and Safety. The FBI Headquarters at the Greenbelt Metro site will be built largely if not entirely upon an existing parking lot that is also currently the destination for vehicles, buses, pedestrians, and bicyclists utilizing the Metro system. The Anacostia bike trail extends south from this Metro station through Berwyn Heights all the way to Washington, DC. The "bike-ability" of this site should continue to be encouraged as a public health benefit. On the flip side, we are neither aware of any hazardous materials associated with this location that would need to be abated, nor are there any other businesses or government activities that would be displaced or otherwise affected by the FBI building on this site.
- Water Resources. The Greenbelt Metro site does encompass part of the Indian Creek and Narragansett Run waterways; it therefore would be important to Berwyn Heights that these wetlands be disturbed as minimally as possible. By building within the current footprint of the Greenbelt Metro parking lot, we believe this impact will consequently be mitigated, and the waterways used in such a manner as to provide a natural and environmentally-friendly security barrier for the facility. In fact, sound green policies, which we understand are standard practices in the development of federal facilities, are likely to improve both the volume and quality of storm water discharged from the acres of asphalt that currently cover the site and could be a meaningful net-benefit to Indian Creek, the Anacostia Watershed, and the Chesapeake Bay.

By the time the campus opens in Greenbelt (perhaps as early as 2020), we anticipate that the "workforce of the future" will very much appreciate the amenities the Greenbelt Metro site will provide to the FBI Headquarters. Given the demographic, social, and economic trends toward urban living, localism, social responsibility, green space preservation and sustainability, we feel this transit-oriented development location best provides these resources that make for an attractive future workplace. These are all aspects of the project embraced by the residents of Berwyn Heights, and we look forward with great enthusiasm at the prospect of sharing them with our FBI neighbors.

Please feel free to contact me or Town Administrator Jessica Cowles at (301) 474-5000 if you have questions or need any further details on these items.

Sincerely.

Cheye M. Calvo

Mayor

United States Department of Agriculture



Natural Resources Conservation Service 28577 Mary's Court, Suite 3 Easton, Maryland 21601-7499 Phone: 410 822-1577 ext. 3

DATE: Oct. 23, 2014

TO: Nia Francis, Project Manager

U.S. General Services Administration

301 7th St. SW Room 4004 Washington, DC 20407

SUBJECT: National Environmental Policy Act

Environmental Assessment for FBI HQ Relocation Project NEPA Scoping Comments

Dear Ms. Francis:

The responsibilities of our agency for your environmental assessment of the proposed FBI HQ Relocation Project is to provide technical assistance by evaluating the proposed project's possible affects with respect to any environmental impacts.

The proposed project's purpose is to consolidate and relocated FBI HQ's. You have asked for comments as related to "scoping" (process of determining the scope of issues to be addressed in the EIS) for three of the potential locations for the project.

I'm going to first address the <u>Landover and Springfield sites</u> since they are similar in their environmental footprints. Because both of these sites are designated as Urban Areas by the Census Bureau many environmental impacts associated with soils their suitabilities, prime farmland/statewide important farmland conversion, and conservation management practices won't pertain to the EIS of the project. Both areas have no current crop production occurring within the proposed projects areas. Impacts due to water discharges from the project areas need to be considered. Erosion and other impacts to water quality, streamflow, floodplains and wetlands will need to be addressed due to the proximity of the Cattail Branch stream to the Landover site and Long Branch stream to the Springfield site. Also any potential impacts to the ecosystems (major plant communities, terrestrial and aquatic life, and threatened or endangered plants) associated with these two waterways will also need to be addressed. Since both sites are surrounded by private lands any causes associated to flooding problems and water related structures (bridges, culverts, etc.) should be considered.

For the Greenbelt site the "scoping" document was unclear as to the exact location of the proposed project site. I couldn't tell if it was to be adjacent to the current station and large parking area or directly north of the Beltway adjacent to the railway/train yard. With either location the potential impacts are similar to the other two sites (Landover and Springfield) except the Greenbelt site is directly next to the floodplains of the Indian Creek and Beaverdam Creek. Both of these waterways have fairly large floodplains which could be severely affected by the project unless the potential environmental impacts are addressed. Again water discharge, erosion, water quality, streamflow, floodplain, wetland, ecosystems (major plant communities, terrestrial and aquatic life, and threatened or endangered plants) impacts will need to be addressed. The Greenbelt site (except the floodplains of the two creeks) is also designated as Urban Area by the Census Bureau. So again, many environmental impacts associated with soils their suitabilities, prime farmland/statewide important farmland conversion, and conservation management practices won't pertain to the EIS of the project. This area has no current crop production occurring within the proposed projects area.

I am available to provide additional and more detailed comments once you have your EIS prepared for any or all of the sites. Thank you for the opportunity to provide comments on your scoping issues request.

If you require any additional information, please let us know.

Sincerely,

James E. Brewer, CPSS/SC

James E. Brewer

Resource Soil Scientist 28577 Mary's Ct. Suite 3

Easton, Maryland 21601

Natural Resources Conservation Service

United States Department of Agriculture

james.brewer@md.usda.gov

410 822-1577 ext 121

cc: Phillip King Dover, DE

Patricia Engler Annapolis, MD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

OCT 2 1 2014

Ms. Nia Francis, Project Manager U.S. General Services Administration – NCR Public Buildings Service Office of Planning and Design Quality 301 7th Street, SW, Room 4004 Washington, DC 20407

Re: Scoping to Prepare an Environmental Impact Statement (EIS) for the Proposed Federal Bureau of Investigation Headquarters Consolidation and Exchange of the J. Edgar Hoover Building

Dear Ms. Francis:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency has reviewed the scoping information provided for the proposed Federal Bureau of Investigation (FBI) Headquarters (HQ) Consolidation and Exchange of the J. Edgar Hoover Building.

An Environmental Impact Statement (EIS) is planned for the purpose of consolidating the FBI HQ from multiple locations in the National Capital Region to a new permanent location. As well as to ensure that the new location meets the Level V Interagency Security Council (ISC) security standard reserved for agencies with mission functions critical to national security or continuation of government.

GSA will study the impacts of developing an up to 2.1 million rentable square feet consolidated FBI HQ on three site alternatives. These sites are: 1. Greenbelt (also known as Greenbelt Metro Station) in Prince George's County, Maryland; 2. Landover (also known as the former Landover Mall) in Prince George's County, Maryland; and 3. Springfield (also known as the GSA Franconia Warehouse Complex) in Fairfax County, Virginia.

EPA has included general information for your consideration and inclusion in the EIS which is provided in the Technical Comments document (enclosed). Thank you for the opportunity to review this project. EPA looks forward to receiving the EIS. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

Barbara Rudnick

NEPA Team Leader

Office of Environmental Programs

Enclosure (1)

Technical Comments

Purpose and Need

Since the range of alternatives evaluated is defined by the purpose and need for the project, it is imperative that the purpose and need be clearly identified in the Environmental Impact Statement. The purpose or objective of the proposal should be defined in relationship to the need for the action. Therefore, the need for the action should identify and describe the underlying problem or deficiency; facts and analyses supporting the problem or deficiency in the particular location at the particular time should be specified; and the context or perspective of the agency mission in relation to the need for action should be stated.

Alternatives Analysis

The alternatives analysis is central to the Environmental Impact Statement and it is important to provide it in the public document. The alternatives analysis should include other alternative sites considered and eliminated and alternative site designs of the Preferred Alternative to determine the least environmentally intrusive alternative. As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, the reasons for their elimination should be given.

Land Use

The project area should be described in detail and quantified, specifying the type and acreage of land impacted as well as a description of the existing buildings on the site including their current and past use. Discuss any permits required before commencement of the project. This may include a Section 404/Section 10 permit from the Corps of Engineers, state water quality certification, and local construction and zoning permits.

In addition to NEPA, other laws, regulations, permits, licenses and Executive Orders may be applicable to the Proposed Action. A summary of applicable regulatory requirements and approvals with which the Proposed Action must demonstrate compliance should be discussed in the EIS.

2

ENVIRONMENTAL IMPACTS

The EIS should examine the potential direct and indirect impacts of the project on the environment. In addition, mitigation measures for any adverse environmental impacts should be described. Areas that mandate individual attention are described below.

Air Resources

Attainment/Non-attainment: EPA, under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50);. These are: ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), particulate matter (PM), lead (Pb), and sulfur dioxide (SO2). Particulate matter is divided into two classes, coarse particulate matter (PM10), i.e., particulates between 2.5 and 10 microns in diameter, and fine particulate matter (PM 2.5), i.e., particles less than 2.5 microns in diameter. The EIS should identify areas that meet the NAAQS standard for a criteria pollutant as well as those areas where a criteria pollutant level exceeds the NAAQS.

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

Construction Permit Requirements/Temporary Impacts: In an effort to eliminate the NAAQS violation, GSA/DOS should control or minimize construction emissions through use of Best Management Practices (BMPs) in association with each proposed project involving on-site construction.

Water Resources

All water quality issues including surface water, groundwater, drinking water, stormwater management, wastewater management, wetlands, oceans and watersheds should be addressed.

Groundwater: The principal aquifers in the region should be identified and described. All wells, both public and private, that could potentially be affected by the project must be identified. Areas of groundwater recharge in the vicinity should also be identified and any potential impacts from the proposed action examined.

Surface Water Resources: The EIS should outline measures to protect surface waters. The aquatic ecosystem must be evaluated carefully and include a detailed discussion of runoff, sediment and erosion control measures. Such mitigation measures must address both short term construction impacts and long term project impacts.

Chesapeake Bay Watershed: Chesapeake Bay Executive Order 13508, Protecting and Restoring a National Treasure, tasked a team of federal agencies to draft a way forward for protection and restoration of the Chesapeake watershed. This team, the Federal Leadership Committee for the Chesapeake Bay, developed the Strategy for Protecting and Restoring the Chesapeake Bay Watershed. This strategy sets out clear and aggressive goals, outcomes, and objectives to be accomplished through 2025 by the federal government, working closely with state, local, and nongovernmental partners, to protect and restore the health of the Chesapeake Bay watershed. The strategy deepens the federal commitment to the Chesapeake region, with agencies dedicating unprecedented resources, targeting actions where they can have the most impact, ensuring that federal lands and facilities lead by example in environmental stewardship and taking a comprehensive, ecosystem-wide approach to restoration.

Wetlands: Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. The EIS must analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement.

Stormwater Management/Low Impact Development: Stormwater runoff in urban and developing areas is one of the leading sources of water pollution in the United States. In recognition of this issue, Congress enacted Section 438 of the Energy Independence and Security Act of 2007 (EISA) to require federal agencies to reduce stormwater runoff from federal development projects to protect water resources. More recently, the President signed Executive Order 13514 on Federal Leadership in Environmental, Energy, and Economic Performance (additional information on EO 13514 is provided below) calling upon all federal agencies to "lead by example" to address a wide range of environmental issues, including stormwater runoff. The Executive Order required the U.S. Environmental Protection Agency (EPA), in coordination with other federal agencies, to publish Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act.

The intent of Section 438 of the EISA is to require federal agencies to develop and redevelop applicable facilities in a manner than maintains or restores stormwater runoff to the maximum extent technically feasible. Implementation of Section 438 of the EISA can be achieved through the use of the green infrastructure/low impact development (GI/LID) infrastructure tools described in the Technical Guidance

(www.epa.gov/owow/nps/lid/section438). For more information on specific GI/LID practices and how they function, visit: www.epa.gov/greeninfrastructure and www.epa.gov/nps.lid. The intention of the statute is to maintain or restore the pre-development site hydrology during the development or redevelopment process. To be more specific, this requirement is intended to ensure that receiving waters are not negatively impacted by changes in runoff temperature, volumes, durations and rates resulting from federal projects.

The fundamental principle of the Technical Guidance is to employ systems and practices that use or mimic natural processes to: 1) infiltrate and recharge, 2) evapotranspire, and/or 3) harvest and use precipitation near to where it falls to earth. Implementation of these new stormwater performance requirements in EISA Section 438 provides numerous environmental and economic benefits in addition to reducing the volume of stormwater runoff.

Physiography

The physical and natural resources of the project area should be described including physiographic provinces, topography, climate and geologic setting. Soils at the project should be mapped and outlined. Distribution and classification of soils within the study area, and the major soil types found at the project site should be described.

Terrestrial Resources

The EIS should provide a complete description of the terrestrial habitat resources in the study area. Complete species lists for mammals, birds, amphibians, reptiles, and plants present in the study area should be provided. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated.

Threatened and Endangered Species

The Endangered Species Act (ESA) provides for the listing of endangered and threatened species of plants and animals as well as the designation of critical habitat for listed species. The ESA prohibits the taking of any listed species without (for federal agencies) an "Incidental Take Statement." The EIS should provide a description of terrestrial, wildlife and aquatic species in the study area. Any threatened or endangered species must be listed. Critical habitat for threatened or endangered species should be properly identified. The EIS should describe the potential project impacts to these species. The most recent state and federal threatened and endangered species coordination letters should be included in the EIS. In addition, we recommend that the appropriate state and federal agencies be contacted annually at a minimum regarding these issues.

Waste Management

The Resource Conservation and Recovery Act (RCRA) passed in 1976, continued earlier provisions relating to solid waste and resource recovery, including hazardous waste. The act sets standards for hazardous waste treatment, storage, and disposal facilities. The management of hazardous waste at the facility should be conducted in compliance with RCRA. The EIS should also state if a Hazardous Waste Management Plan and a Hazardous Waste Minimization Plan are in place.

Identify known hazardous materials, including asbestos-containing materials (AM), lead-based paint (LBP), and oil and other hazardous materials (OHMs), located within the study area. The status of the materials should be discussed as well as remedial methods described (if applicable) in addition to providing a detailed plan for proper disposal.

COMMUNITY IMPACTS

Noise: EPA retains authority to investigate and study noise and its effect, disseminate information to the public regarding noise pollution and its adverse health effects, respond to inquiries on matters related to noise, and evaluate the effectiveness of existing regulations for protecting the public health and welfare, pursuant to the Noise Control Act of 1972 and the Quiet Communities Act of 1978. Noise pollution adversely affects the lives of millions of people. Studies have shown that there are direct links between noise and health. Problems related to noise include stress related illnesses, high blood pressure, speech interference, hearing loss, sleep disruption, and lost productivity. Noise Induced Hearing Loss (NIHL) is the most common and often discussed health effect, but research has shown that exposure to constant or high levels of noise can cause countless adverse health effects. Please discuss potential noise impacts that may result from the Proposed Action.

Socioeconomics: Discuss the socioeconomic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. The EIS should address the decrease or increase of people/employees/jobs in relation to its effect on tax base, local housing, job markets, schools, utilities, businesses, etc.

Traffic and Transportation: The EIS should address traffic and transportation as it relates to the Proposed Action. It may be necessary to provide an evaluation of existing roads specifying existing levels of service at major intersections near the project area as well as accident data. If appropriate, an evaluation of the impacts associated with an increased number of employees should be provided. The EIS should discuss existing and proposed public transportation to the area under consideration and provide estimates of expected usage. Traffic projections should then be made to show expected conditions for a completed project.

Environmental Justice: Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, directs each federal agency to incorporate environmental justice into its mission and activities by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations...." The Executive Order also explicitly called for the application of equal consideration for Native American programs. The EIS should identify Environmental Justice (EJ) communities in the study area and discuss potential impacts that the Proposed Action may have on these communities.

Children's Health: Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires each federal agency to identify and assess environmental health and safety risks to children. "Environmental health and safety risks" are defined as "risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or ingest." When conducting assessments of environmental risks, the lead agency should consistently and explicitly take into account health risks to children and infants from environmental hazards. Please identify/discuss children in the study area and potential impacts that may result from the Proposed Action.

Cultural Resources: EPA understands that GSA will be consulting with the District of Columbia Historic Preservation Office, the Virginia Department of Historic Resources, the Maryland Historic Trust and other interested parties to identify historic properties that may potentially be affected by the implementation of the proposed action and to seek ways to resolve potential adverse effects. Please include within the EIS detailed descriptions of the affected sites and potential impacts including correspondence with agencies and a Memorandum of Agreement, if applicable.

Cumulative Impacts

Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. The Council on Environmental Quality in 40 CFR 1508.7 defines cumulative impacts as "impacts on the environment which 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." Therefore, a cumulative impacts assessment should be an integral part of the EIS.

Leadership in Energy and Environmental Design

The LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance,

sustainable buildings. Members of the U.S. Green Building Council representing all segments of the building industry developed LEED and continue to contribute to its evolution. LEED standards are currently available for:

- new construction and major renovation projects (LEED-NC)
- existing building operations (LEED-EB, Pilot version)
- commercial interiors projects (LEED-CI, Pilot version)
- core and shell projects (LEED-CS, Pilot version)

LEED was created in order to define "green building" by establishing a common standard of measurement; promote integrated, whole-building design practices; recognize environmental leadership in the building industry; stimulate green competition; raise consumer awareness of green building benefits; and transform the building market. Please address and incorporate LEED within the project design, where appropriate.

LEED provides a complete framework for assessing building performance and meeting sustainability goals. Based on well-founded scientific standards, LEED emphasizes state of the art strategies for sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality. LEED recognizes achievements and promotes expertise in green building through a comprehensive system offering project certification, professional accreditation, training and practical resources. For more information, contact the U.S. Green Building Council at the following web address: http://www.usgbc.org/leed.

Executive Order 13514

Executive Order (EO) 13514 Federal Leadership in Environmental, Energy, and Economic Performance was signed on October 5, 2009. The purpose of EO 13514 is "to establish an integrated strategy towards sustainability in the Federal Government and to make reduction of greenhouse gas emissions (GHG) a priority for Federal agencies." The EO does not rescind/eliminate the requirements of EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management. Instead, it expands on the energy reduction and environmental performance requirements for Federal agencies identified in EO 13423. EO 13514 sets numerous Federal energy requirements in several areas, including:

- Accountability and Transparency
- Strategic Sustainability Performance Planning
- Greenhouse Gas Management
- Sustainable Buildings and Communities
- Water Efficiency
- Electronic Products and Services
- Fleet and Transportation Management
- Pollution Prevention and Waste Reduction

Please refer to the full text of EO 13514 for specific numerical and non-numerical targets for Federal agencies to reach and show how project planning incorporates EO 13514 requirements, where applicable.

Distribution List

An EIS should include a Distribution List of agencies, organizations, and persons to whom copies of the document were sent as indicated in 40 CFR §1502.10 under "Recommended format" and §1502.19. A Distribution List identifies those parties who have been given the opportunity to comment and reveals that those not included on the list may need to be given the EIS for review. This information is critical to ensuring all necessary parties are given the opportunity to review and provide input to the impacts of the proposed action.



October 23, 2014

U.S. General Services Administration – NCR Public Buildings Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 Seventh Street SW, Room 4004 Washington, DC 20407

Re: Notice-PBS-2014-04

Dear Ms. Francis:

In response to the subject Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Proposed Federal Bureau of Investigation (FBI) Headquarters (HQ) Consolidation and Exchange of the J. Edgar Hoover Building, the Washington Metropolitan Area Transit Authority (WMATA) hereby provides initial comments about the scoping process for the proposed action.

About WMATA

WMATA, known locally as "Metro", provides rail, bus and paratransit service to a 1,500-square mile area that includes Washington, DC, and the surrounding jurisdictions in Maryland and Virginia. Around 40 percent of rush-hour Metrorail riders are federal employees, and service is provided to millions of tourists who visit the nation's capital per year. Metro operates the second largest heavy rail transit system, sixth largest bus network and fifth largest paratransit service in the United States:

Washington Metropolitan Area Transit Authority

600 Fifth Street, NW Washington, DC 20001 202/962-1234

www.metroopensdoors.com

- Metrorail currently operates 1,092 heavy rail cars serving 91 rail stations over 117 miles of track, providing more than 750,000 trips on a typical weekday;
- Metrobus operates 1,525 buses, providing 132 million annual trips on 318 routes serving 11,279 bus stops; and
- MetroAccess provides 2 million annual door-to-door paratransit trips for customers with disabilities who are unable to use Metro's accessible fixed route services for some or all of their trips.

A District of Columbia, Maryland and Virginia Transit Partnership Nia Francis October 23, 2014 Page 2

WMATA understands that GSA, in cooperation with the FBI, is considering consolidating the existing FBI HQ offices and divisions into one location within two-miles of a Metrorail station in the greater Washington, DC area to support information sharing, collaboration and integration of strategic priorities. WMATA supports GSA's efforts to locate federal jobs in proximity to transit. Locations close to transit offer good opportunities for FBI employees to use public transit for their commute. All three alternatives (Greenbelt, Landover and Springfield) being considered are at or near end-of-the-line stations, so most Metrorail commuters to any of these sites would be traveling away from Metro's congested downtown core. Encouraging such commuting patterns promotes an efficient use of Metro's rail capacity.

EIS Scoping

During the EIS process it's important to analyze the potential impacts each FBI HQ alternative would have on the respective Metrorail station(s) and station area(s). WMATA has identified the following analyses that should be conducted as part of the EIS:

- Analysis of potential impacts additional riders would have on internal rail station capacity including fare gates, escalators/stairs and elevators at both the origin and destination rail stations.
- Analysis of potential impacts additional riders would have on rail station access including commuter parking and Kiss & Ride facilities at both the origin and destination rail stations.
- Analysis of additional bus/shuttle services needed to get commuters between the FBI facility and the rail station and how those services could be accommodated, with priority given toward transit available to the general public.
- Analysis of the ability of passengers to board buses and shuttles at connecting rail stations and the capacity of the station facilities including bus bays to accommodate the flow of passengers and buses.
- Analysis of pedestrian and bicycle connections and facilities needed to promote walking and encourage bicycle use between the FBI HQ and the Metrorail station as well as to the surrounding community.

Nia Francis October 23, 2014 Page 3

- Traffic analysis to ensure that the roadways and intersections can be designed to handle the projected traffic volumes.
- Analysis of the potential impacts the vehicle inspection queue(s) for the FBI HQ may have on the adjacent roadway network (i.e., back-ups on adjacent roadway and intersections).
- Analysis of impacts to floodplains and wetlands.

Construction in the vicinity of any Metrorail system infrastructure must be coordinated with WMATA to ensure safety and eliminate conflicts. Specifically, any construction within the WMATA Zone of Influence, as defined in Metro's Adjacent Construction Project Manual, or any construction that requires temporary or permanent use of WMATA property, is subject to review and coordination with WMATA. For additional information, the Adjacent Construction Project Manual is posted on-line at:

http://www.wmata.com/pdfs/business/Adjacent%20Construction%20Project%20Manua I%20(ACPM).pdf

Thank you again for the opportunity to comment on the scoping for the FBI HQ EIS. Metro staff would appreciate the opportunity to meet with you and your consultants to discuss the EIS as it relates to the items discussed above. I can be reached at 202-962-2616 or at swall@wmata.com. You may also contact Robin McElhenny at 202-962-1114 or at rmcelhennysmith@wmata.com.

Sincerely.

Director

Office of Real Estate and Station Planning



September 16, 2014

U. S. General Services Administration – NCR Public Building Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street, SW, Room 4004 Washington, DC 20407

Dear Nia Francis,

Thank you for your letter concerning the proposed Federal Bureau of Investigation Headquarters Consolidation and Exchange of the J. Edgar Hoover Building.

We are in support of the proposal and feel that it will be a positive impact for our community should the Greenbelt and/or Landover site is chosen as a permanent site.

Thank you for the information concerning this process. A church representative will attend the Landover Site public scoping meeting on October 2, 2014 (5:30-8:30 p.m.) at the Sports Center to hear further information concerning the consolidation and exchange process.

In His Service,

Robert A. Wingfield, Pastor Woodstream Church

La. Let a. Hyfull

From: "Bernard H. Berne' via FBI HQ Consolidation" <fbi-hq-consolidation@gsa.gov>

Date: September 25, 2014 at 7:46:32 PM MDT

To: fbi-hq-consolidation@gsa.gov

Subject: Revised Public Comment on Environmental Impact Statement for Consolidated

FBI Headquarters

Reply-To: "Bernard H. Berne" bhberne@yahoo.com

Please consider the comment below during the scoping process for the Environmental Impact Statement (EIS) for the Consolidated Federal Bureau of Investigation (FBI) Headquarters.

President Jimmy Carter's Executive Order 12072 (Federal Space Management), August 16, 1978 (43 FR 36869) (at http://www.gsa.gov/portal/content/101580), which is still in effect and has the force of law, states:

- 1-101. Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Such Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities."
- 1-103. Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials.
- 1-301: The heads of Executive agencies shall cooperate with the Administrator in implementing the policies of this Order and shall economize on their use of space.

President Bill Clinton's Executive Order 13006 (Locating Federal Facilities on Historic Properties in our Nation's Central Cities) (at http://www.gsa.gov/portal/content/100842) states:

"Section 1. Statement of Policy.

Through the Administration's community empowerment initiatives, the Federal Government has undertaken various efforts to revitalize our central cities, which have historically served as the centers for growth and commerce in our metropolitan areas. Accordingly, the Administration hereby reaffirms the commitment set forth in Executive Order No. 12072 to strengthen our Nation's cities by encouraging the location of Federal facilities in our central cities."

41 CFR 101-17.002 (Basic policy) (at http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/pdf/CFR-2000-title41-vol2-sec101-17-002.pdf) implements Executive Order 12072. This section of the CFR states:

- GSA has oversight responsibility for Federal agency compliance with Executive Order 12072, including space acquisition in urban areas accomplished under authority other than the Federal Property and Administrative Services Act of 1949, as amended. As required by section 901(b) of the Agriculture Act of 1970, 84 Stat. 1383, as amended by section 601 of the Rural Development Act of 1972, 86 Stat. 674 (42 U.S.C. 1322(b)), it is the responsibility of each agency to determine which of its new offices should be located in rural areas. When it is determined that agency space needs require an urban location, GSA and other Federal agencies shall be governed by the following policies for the assignment, reassignment, and use of buildings and space.
- (a) Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities.

- (b) Serious consideration shall be given to the impact that a location or relocation will have on improving the social, economic, environmental, and cultural conditions of the communities in an urban area. To the extent feasible, plans and programs for meeting space needs shall enhance and support the development, redevelopment, and revitalization objectives and priorities of cities in urban areas and shall enhance and support the employment and economic base of these cities. Both positive and negative impacts of space acquisition actions shall be weighed with the objective of obtaining maximum socioeconomic benefits from these actions.
- (c) In meeting space needs in urban areas:
- (1) First consideration shall be given to a centralized business area and adjacent areas of similar character in the central city of Standard Metropolitan Statistical Areas (SMSA) defined by the Department of Commerce publication (Government Printing Office Stock Number 041-001-00101-8), including other specific areas of a city recommended by the elected chief executive officer of the local government or a designee, except where this type of consideration is otherwise prohibited.

The Federal Elements section of the National Capital Planning Commission's Comprehensive Plan, updated in 2002 (at

http://www.ncpc.gov/DocumentDepot/Publications/CompPlan/CompPlanPartTwo_FedWorkplace.pdf) states on page 40 in its "Policies" section:

The federal government should:

- 1. Achieve within the District of Columbia a relative share of the region's federal employment (civilian and military) that is not less than 60 percent of the region's.
- 2. Locate employees near other federal agencies and departments with which they regularly interact.
- 3. Locate federal workplaces in urban areas, giving first consideration to the District of Columbia and second consideration to other centralized community business areas and areas of similar character, including other specific areas that may be recommended by local agencies, with the following exception:

Workplaces that have specific land use requirements (including the need for large amounts of land, buffers, and extensive future expansion needs) should locate where these requirements can be fulfilled.

The Federal Elements section contains a table and chart on page 20 that show that 193,835 (53.5%) of the National Capital Region's 362,811 civilian and military federal employees worked in the District of Columbia in 2002. Trends illustrated in the chart do not suggest that the percentage of federal employees working in the District of Columbia relative to those working in the entire region have achieved the 60 percent goal at present.

41 CFR 17.033-33 (http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/xml/CFR-2000-title41-vol2-sec101-17-003-33.xml) defines an "urban area" as: ... any Standard Metropolitan Statistical Area (SMSA) as defined by the Department of Commerce and any non-SMSA that meets one of the following criteria:

41 CFR 17.033-35 (http://www.gpo.gov/fdsys/pkg/CFR-2000-title41-vol2/xml/CFR-2000-title41-vol2-sec101-17-003-35.xml) defines a "central city" as: any city whose name appears in the title of an SMSA. Criteria for determining SMSA titles are established by the Department of Commerce.

OMB Bulletin No. 13-01, Feb. 28, 2013, at www.whitehouse.gov/sites/default/files/omb/bulletins/2013/b-13-01.pdf, states that the principal cities in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area are Washington, DC; Arlington, VA; Alexandria, VA; Silver Spring, MD; Frederick, MD; Rockville, MD; Bethesda, MD; Gaithersburg, MD; and Reston, VA (see page 51 in the

appendix to OMB Bulletin No. 13-01, Feb. 28, 2013).

Therefore, Executive Orders 12072 and 17003, as well as 41 CFR 101-17.002, require GSA and the FBI to locate the Consolidated FBI headquarters within Washington, D.C. or another of the above principal cities, with certain exceptions that are not relevant to the FBI headquarters. Further, the National Capital Planning Commission's Comprehensive Plan contains policies that encourage GSA and the FBI to locate the facility within District of Columbia, rather than in Maryland or Virginia.

GSA has narrowed its list for the Consolidated FBI Headquarters to specific sites in (1) Greenbelt, Maryland, (2) Landover, Maryland, and (3) Springfield, Virginia. Greenbelt, Maryland, is a city within the Washington-Alexandria, D-C-VA-MD-WV Metropolitan Statistical Area. However, Greenbelt is not one of the principal cities within that Area (see page 51 in the appendix to OMB Bulletin No. 13-01, Feb. 28, 2013). Greenbelt is a "noncentral city" within that Area.

41 CFR 101-17.002(c)(3) states: "If location outside the central city is required, preference shall be given to locations in the central business area of noncentral cities". Thus, GSA can only select a site in Greenbelt if the GSA or the FBI requires that the consolidated FBI headquarters be located outside of Washington, D.C. and all other "principal cities" in the Metropolitan Statistical Area that contains these cities. Neither the GSA nor the FBI has established any such requirement.

Landover, Maryland, and Springfield, Virginia, are not incorporated entities. Sites within these areas are therefore not within cities. Executive Order 12072 and 41 CFR 101-17.002 contain no provisions that permit the FBI headquarters to be located within either Landover or Springfield. Executive Order 12072 and 41 CFR 101-17.002 therefore require GSA to eliminate the Landover and Springfield sites from consideration before the site selection process proceeds any further. The EIS should state that GSA has removed sites in Landover and Springfield from consideration because of requirements in Executive Order 12072, as codified in 41 CFR 101-17.002, et seq.

GSA's considerations of sites in Landover and Springfield, rather than an area that is within a city, are in clear violations of Executive Order 12072 and 41 CFR 101-17.002. Both of these documents state: "Federal facilities and Federal use of space in urban areas shall serve to strengthen the Nation's cities and to make them attractive places to live and work. Such Federal space shall conserve existing urban resources and encourage the development and redevelopment of cities."

"Shall" means "must". There are no exceptions to this.

An FBI headquarters facility in either Landover or Springfield will not serve to strengthen any city or make any city an attractive place to live and work. Instead, the facility would draw FBI employees and contractors and other businesses and residents out of Washington, D.C., thus weakening one of the urban areas central cities. This is especially true because FBI's headquarters is presently located in Washington, D.C.

It is also important to recognize that the relocation of FBI employees from D.C. to Maryland or Virginia would be in direct opposition to the National Capital Planning Commission's goal increase the percentage of federal employees in D.C. relative to the percentage in the entire National Capital Region.

Executive Order 12072 states: "Except where such selection is otherwise prohibited, the process for meeting Federal space needs in urban areas shall give first consideration to a centralized community business area and adjacent areas of similar character, including other specific areas which may be recommended by local officials." The FBI headquarters is presently located in the Central Business District (CBD) of Washington, D.C.

The proposed new FBI headquarters must also be located in that city's CBD unless District of Columbia officials have recommended another specific area within Washington, D.C. for the facility. D.C. officials have already recommended to GSA one such area: Poplar Point. However, there are other sites in Washington, D.C. that may be able to accommodate the consolidated FBI headquarters.

Potential Sites for the Consolidated FBI Headquarters in Washington, D.C.:

Poplar Point and St. Elizabeths Hospital, West Campus:

Officials of the District of Columbia have specifically recommended that the Consolidated FBI Headquarters be located within a site at Poplar Point in Southeast Washington, D.C. According to a Washington Post article dated December 5, 2013, and entitled "D.C. official says GSA criteria renders District "effectively ineligible" to retain FBI HQ" (at

http://www.washingtonpost.com/business/capitalbusiness/dc-official-says-gsa-criteria-renders-district-effectively-ineligible-to-retain-fbi-hq/2013/12/05/1f72b0a4-5c46-11e3-be07-006c776266ed_story.html), a District of Columbia Deputy Mayor, Victor Hoskins, stated in a November 26, 2013, letter to GSA:

".... although Poplar Point has 110 acres, 70 acres there are required by federal law to be preserved as open space, meaning the site is likely too small under the GSA's guidelines. Second, the GSA said it preferred not to relocate the FBI to "sites on which the development of a FBI Headquarters would significantly disturb natural resources (e.g., wetlands and floodplains)" or otherwise negatively affect "the quality of the human and natural environment" in ways that could not otherwise be mitigated."

However, Executive Order 12072 requires GSA to locate the FBI Headquarters in Washington, D.C. or another central city (i.e., principal city) in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area if the FBI and GSA need to locate the facility in that Area. GSA must therefore either reduce the facility's space requirements to enable the facility to be located at Poplar Point or must select another site in a principal city that is in that Area and that can accommodate all or part of the facility. Washington, D.C., Arlington, Alexandria and Reston, Virginia, and Silver Spring, Rockville, Bethesda and Gaithersburg, Maryland are the principal cities of that Area.

As stated above, GSA can locate the FBI headquarters at Poplar Point if GSA and the FBI reduce their space requirements for the facility. GSA can do this by planning a facility that has more density and/or greater height than the facility that it is presently planning.

As also stated above, Executive Order 12072 requires the Director of the FBI and the Administrator of General Services to reduce their space requirements if necessary this by stating in Section 1-301: "The heads of Executive agencies shall cooperate with the Administrator in implementing the policies of this Order and shall economize on their use of space." It presently appears that the GSA Administrator and the FBI Director are failing to sufficiently "economize on their use of space" so that they may locate the the FBI headquarters within the 40 acres available for that facility at Poplar Point.

As noted above, GSA has reportedly stated that construction of the FBI headquarters at Poplar Point would significantly disturb wetlands and floodplains. However, GSA can mitigate these disturbances by either making appropriate plans for the headquarters to minimize such disturbances or by acquiring an/or creating wetlands and floodplains in other locations within the United States, preferably within GSA's National Capital Region. It is therefore clear that GSA can indeed mitigate these environmental disturbances, regardless of any statements that GSA may have previously made to the contrary.

Further, the FBI can divide its facility into more than one components, one of which is at Poplar Point. The remaining facilities can be located nearby, with particular attention given to the proposed site for the Department of Homeland Security (DHS) at the west campus of St. Elizabeths Hospital.

The St. Elizabeths Hospital West Campus is less than two miles away from Poplar Point. Further, it presently appears that DHS will not have the funds available to fully utilize the St. Elizabeths west campus within the foreseeable future.

GSA therefore needs to work with DHS to determine whether part or all of the FBI Headquarters can be located at St. Elizabeth's campus if the Poplar Point site is too small to accommodate the facility. As the FBI and DHS have similar security requirements and overlapping missions, both agencies would benefit if

part or all of the FBI headquarters is located within the St. Elizabeth west campus.

Other Potential Sites in Washington, D.C.:

If GSA and the FBI find that it is not feasible to utilize Poplar Point and/or the St. Elizabeths Hospital West Campus for the Consolidated FBI Headquarter, GSA must comply with Executive Order 12072 by asking D.C. officials to recommend another site within Washington, D.C., that is suitable for the facility. It presently appears that the former campus of the Walter Reed Army Medical Center in Northwest D.C. can accommodate the FBI Headquarters, as might the McMillan Reservoir Sand Filtration Site in Northwest D.C., and the former Coast Guard headquarters at Buzzard Point in Southeast D.C. While the D.C. government officials have not yet recommended any of these sites for the FBI headquarters, GSA needs to evaluate them unless the District of Columbia government specifically rejects them.

If GSA can find no new sites (including privately-owned sites) within Washington, D.C. or another principal city on which to construct the FBI Headquarters, GSA or the FBI must renovate the present FBI Headquarters in Washington's CBD or construct a new facility at that site in order to conform with the requirements of Executive Order 12072. The new facility can be taller or more dense than the present building, providing that the facility conforms with the requirements of the federal Height of Buildings Act of 1910, as amended and that the National Capital Planning Commission approves the project.

Summary:

Executive Order 12072 and 41 CFR 101-17.002 require GSA to locate the FBI headquarters in Washington, D.C., rather than in unincorporated areas such as Landover or Springfield. GSA can only select a site in the City of Greenbelt, Maryland, if the FBI and the GSA require that the facility be located outside of Washington, D.C. and every other principal city in the Statistical Metropolitan Area that contains these cities. This is a legal requirement, not an option.

National Capital Planning Commission policies also encourage federal employment in the District of Columbia, rather than in Maryland and Virginia.

GSA and the FBI must therefore revise their space requirements for the Consolidated FBI Headquarters to permit the facility to be constructed at Poplar Point or to identify a new site in Washington, D,C,. that can accommodate part or all of the headquarters. These alternative sites include:

St. Elizabeths Hospital, West Campus
McMillan Filtration Sand Filtration Site
Former Walter Reed Army Medical Center Site
Former Coast Guard Headquarters at Buzzard Point
Present FBI Headquarters Site
Privately owned sites offered for the facility in the past or in the future

The EIS needs to evaluate all of the above sites. The EIS should only evaluate the Greenbelt site if GSA and the FBI require that the facility be located outside of Washington, D.C. and all other principal cities in the Washington-Arlington-Alexandria, DC-VA-MD-WV Metropolitan Statistical Area. The EIS should reject the Landover and Springfield site because of their non-conformance with Executive Order 12072 and GSA's implementing regulations in 41 CFR 17.002, et seq.

The FBI is the federal government's primary law enforcement agency. For that reason, it is critical that the FBI Director and the GSA Administrator comply with Executive Order 12072 when selecting a site for the FBI's headquarters. A law enforcement agency must itself comply with the law.

Thank you for your consideration.

From: Lee Covington lacoving@gwmail.gwu.edu

Date: Thu, Oct 23, 2014 at 1:59 PM

Subject: NEPA Scoping Comment - Support for Springfield Alternative

To: fbi-hq-consolidation@gsa.gov

Cc: lacoving@gwu.edu

I strongly support the relocation of the FBI HQ to Springfield,VA. Aestetically, the new FBI HQ will be a significant improvement to the current warehouse facility. With the construction of the Department of Defense's Mark Center off Seminary Road in nearby Alexandria and the well-studied and coordinated timing of the traffic lights, we have seen little to no impact on traffic in that area and can assume that similar efforts will be made to minimize the impact on traffic on the local roads surrounding the Springfield site. I would, however, recommend that the possibility of adding direct exits off the Franconia Springfield Parkway to the entrance of the FBI HQ site be considered. This would allow for easy access to and departure from the site for employees arriving from the East and West.

From the Springfield site, FBI employees would have a relatively easy trip (35-45 minutes) by car to downtown Washington, DC for travel to the Department of Justice and the FBI Field Office. ODNI HQ and CIA HQ would also be a short 30-35 minute drive by car. NGA is located right on the other side of Interstate 95 (5 minutes by car). One additional advantage the Springfield site has is its proximity to the FBI Training Academy in Quantico, which would also be about a 30 minute drive from Springfield.

Springfield offers many amenties to FBI's workforce. The new Springfield Town Center has a new gym/sports club and several restaurants. The Kingstowne Town Center, a 5 minute drive from the Springfield site has additional restaurants - Bonefish Grill, Firehouse Subs, Noodles & Company, a Thai restaurant, an Asian fusion restaurant, Le Madeleine, Ledo Pizza, as well as a Safeway, Giant, post office and dry cleaners. In early 2015, the Wegman's grocery store at Beulah and Telegraph Rd (a 7-minute drive from the Springfield site) will open and will be an additional option for lunch with its food bars and togo items.

There are also several hotels in the area that would be convenient for visitors. (There is a Hilton off Loisdale Road, an extended stay hotel near the metro, and a Marriot on nearby Old Keene Mill Road.

Moreover, this area has very good schools and communities and would be an excellent neighborhood for those FBI employees considering a possible re-location in the future.

The re-location of FBI HQ to Springfield has many advantages, with little negative impact on the environment. I hope you will strongly consider (and eventually select) the Springfield site.

Sincerely, Lee Ann Covington 6200 Roudsby Lane Alexandria, VA 22315 (703) 924-1101 From: "Jeter, Donna M." < Donna.Jeter@ic.fbi.gov>

Date: October 22, 2014 at 2:53:56 PM MDT

To: "fbi-hq-consolidation@gsa.gov" <fbi-hq-consolidation@gsa.gov>

Cc: "Jeter, Donna M." < Donna. Jeter@ic.fbi.gov>

Subject: NEPA Scoping Comment

The comments/questions that I would like to make are:

Will shuttle or bus service be provided for employees who utilize the metro rail in order for employees to get to the new building and vice versa? Not everyone will be afforded a parking pass, and not everyone will be able to walk from the metro rail to the building. If so will the shuttle/bus service what type of schedule will it run? For instance every 30 minutes, or every 20 minutes, or even every 15 minutes?

If Springfield site is chosen, those coming from Maryland or even farther will always be against traffic. If a Maryland site is chosen it is still bringing people into DC to utilize metro rail to the new building.

*Cubicles – this may not be GSA's area but having cubicles with high/medium walls - similar to what FBIHQ has now should work for everyone, making a work area smaller benefits nobody. People spend up to 10 hours a day and everybody needs to have a nice work area.

Donna M. Jeter Management Program Analyst Federal Bureau of Investigation

Desk: (202) 324-6440 Fax: (202) 324-9921 BB: (202) 577-9972 From: Angela Johnson <ajohnson@fieldstoneprop.com>

Date: October 23, 2014 at 3:43:47 PM MDT

To: "fbi-hq-consolidation@gsa.gov" <fbi-hq-consolidation@gsa.gov>

Subject: FW: NEPA Scoping Comment

Greetings on behalf of Franklin Park @ Greenbelt Station!

Franklin Park@ Greenbelt Station is owned and managed by Fieldstone Property Management Company. I am writing to provide our response to the environmental impact of the proposed facility.

Franklin Park is the largest multi-family community east of the Mississippi with 2,877 apartment homes and townhomes. Our community provides housing for 10,000 residents. Millions of dollars have been invested in upgrading the homes and grounds of this 153-acre park like community. We are very proud that this property has been transitioned into a very attractive and affordable residence to a well qualified population. Our community members are awaiting the FBI arrival with great anticipation of new stable employment opportunities being added to the Greenbelt area.

We have been deeply involved with the City of Greenbelt over the past years during our Renovation and Development process. This has allowed us to be already familiar with the careful planning and consideration that the City of Greenbelt, Prince George's County and various other governmental agencies utilize in evaluating giving the go ahead for renovation and development plans. The information presented for public viewing offers evidence that all necessary considerations have been made for the community and the quality of life for the area.

The City of Greenbelt would greatly benefit from the socioeconomic and physical environment enhancements to the immediate areas and surrounding property and would also enable enhancements to public services.

In the past, Prince George's County has not been a beneficiary of GSA leases to the same level as other areas in the Washington Region. The arrival of FBI headquarters in the Greenbelt area would serve as a nucleus of increased economic opportunity for the city of Greenbelt, as well as, Berwyn Heights, College Park and the greater Prince George's County area.

Based on the information presented, the physical environment benefits will be noticeable improvement to the area traffic flow. The plan incorporates enhancements to the road network surrounding the property. The development also has included the design to improve storm water treatment. The plans ensure that the natural environment is protected in all other phases of the development.

The increase of commercial tax revenue will enable the City of Greenbelt to enhance public services throughout the City. This would be a welcomed change to our community and surrounding area.

In conclusion, on behalf of the owners and management of the residential community that will be directly affected by the proposed facility, both for us and current community members, we agree with and support the proposed FBI Headquarters at Greenbelt Station.

Sincerely,

Angela R. Johnson| Director of Housing Partnerships Franklin Park at Greenbelt Station 6220 Springhill Drive (Leasing Center) Greenbelt, MD 20770

office: 301.474.1600 fax: 301-474-8784

From: **Kenneth Jones** < KJones@cityofglenarden.org>

Date: Thu, Oct 23, 2014 at 3:37 PM Subject: NEPA Scoping Comment To: fbi-hq-consolidation@gsa.gov

Cc: Council Clerk ttaylor@cityofglenarden.org

October 23, 2014 Nina Francis Project Manager U.S. General Services Administration-NCR Public Building Service 301 7th Street, SW, Room 40004 Washington, DC 20407

Dear Ms. Francis:

Please accept my compliments for the very informative presentation when our City Council Members attended the public information session for the relocation of Federal Bureau of Investigation Headquarters (FBI HQ) at the Wayne K. Curry Sports and Learning Complex in Landover, Maryland on October 2, 2014. While touring the exhibits at the information session, the council members pointed out several things which were not represented or underrepresented by the exhibits.

The City of Glenarden was not shown on the map at the public information session. However, all the alternate site maps indicated the proximity of the subject property to the closest municipalities. The City of Glenarden includes the Woodmore Towne Centre at Glenarden, but on the maps it appeared to be part of Landover, Maryland. The Glenarden Apartments are now vacant and currently being torn down to make way for a new Planned Unit Development led by the Prince Georges Redevelopment Authority on an adjacent 65 acre parcel. This development will offer a mix of town homes, retail, and apartments which could serve people working at the Landover site.

The MARC Train and Greyhound Station have close proximity to the Landover Mall site. Additionally, the A12 & F14 bus lines running through the City were not well represented on the exhibits.

The City of Glenarden respectfully asks the above items be given consideration and the exhibits be conformed in the future to reflect the same.

The City of Glenarden supports relocating the FBI HQ to the former Landover Mall site in the strongest possible terms.

Sincerely,

Kenneth M. Jones Jr.
Acting City Manager
Kenneth Jones
Acting City Manager
City of Glenarden
8600 Glenarden Parkway
Glenarden, MD 20706
(301) 773-2102 office
(301) 773-4388 fax
kjones@cityofglenarden.org

From: <b.mann@cox.net>

Date: October 16, 2014 at 6:37:20 PM MDT

To: fbi-hq-consolidation@gsa.gov Subject: NEPA Scoping Comment

The proposed Springfield Site for the FBI HQ is superior to either of the two Maryland sites because the Franconia-Springfield Metrorail Station has an exurban rail line, more specifically VRE, which runs all the way down to Fredericksburg with a stop at FS station before running into DC. This is so important because many FBI employees will relocate their homes outward from their new job sites after their jobs move to the suburbs. Most likely, many will start purchasing homes soon after hearing they will relocate to the suburbs. Housing is cheaper the further you locate out from the Beltway. Prices drop an average of \$15,000 per mile outward from the Beltway. Many will take advantage of this financial gift. With an exurban rail line like VRE, FBI employees in the Virginia exurbs would have more options for commuting than they would in the Maryland exurbs. In Maryland, developers will construct many exurban subdivisions mostly east and southeast of Greenbelt or Landover to attract new FBI employees and there is no rail option there, only highways. More importantly, when the FBI does relocate to Springfield, it is likely the Manassas VRE line would start running into Springfield, too. All VRE would have to do is make a small rail connection between the Manassas line and the Fredericksburg line in a location, say just east of Backlick Stream Valley Park, or at another location where the two lines come close.

Bottom line is any employer relocation decision should be based not on where their employees currently live but where they will live after the relocation decision is made. With many FBI employees relocating to the exurbs for cheaper housing, we need to give them both highway and rail options for commuting, not just highway options. Since Virginia has an exurban rail line in operation now into FS, the Springfield site is clearly the best location for minimizing exurban commuting impacts and maximizing commuter options for all its employees.

Sincerely, Bill Mann 6447 Windham Ave Kingstown, VA 22315 703-922-5454 From: Kristen Mann kmannva@gmail.com
Date: October 21, 2014 at 5:22:19 PM MDT

To: fbi-hq-consolidation@gsa.gov Subject: NEPA Scoping Comment

The Springfield site is better than the Maryland sites because of less Potomac River Beltway commuter impacts from the Springfield site than from either of the Maryland sites. The argument for this statement follows. Higher income FBI agents and senior staff employees live in Virginia to take advantage of better rated schools, higher income subdivisions, less crime, etc. and they will continue to live here even if the Maryland sites are selected for FBI HQ. While many of the lower income FBI employees living in Virginia, DC or Maryland will take rail to the 3 proposed sites, a majority of the higher income employees will drive to the new sites according to the MWCOG/TPB travel forecasting model. Most of those crossing the Potomac River will take the Beltway bridges to either of the proposed FBI sites. Since more high income employees live in Virginia, this will result in more Potomac River Beltway crossings to Maryland sites than the high income Maryland residents crossing to Springfield. Thus, a Maryland selection will result in more Potomac River Beltway crossings and more peak period congestion than the Springfield selection.

The reason this is so important is because each new Potomac River Beltway lane costs over \$1 billion per lane to build and thus we will probably never see another Beltway bridge lane built in our lifetimes. So, we need to do all we can to keep Potomac River Beltway peak period crossings to a minimum.

In conclusion, a cost effective way to address regional highway congestion, and maybe the best one in the entire region, if ranked, is to minimize peak period Potomac River Beltway crossings and put the FBI HQ in Springfield.

Kristen Mann 6586 Windham Ave Alexandria VA 22315 703-870-1978

40 (no 41)

From: Nancy-jo Manney <manney@springfieldchamber.org>

Date: Thu, Sep 11, 2014 at 10:38 AM Subject: NEPA Scoping Comment

To: nia.francis@gsa.gov

September 10, 2014 General Services Administration Attention: Nia Francis, Project Manager 301 7th Street SW, Room 4004 Washington, DC 20407

Dear Ms. Francis,

I write today on behalf of the Greater Springfield Chamber of Commerce in support of relocating the FBI Headquarters to Springfield, Virginia. We believe that this move would have a positive impact on the FBI, its employees, and on the quality of life in the Greater Springfield area and throughout Fairfax County. We encourage you to consider these benefits of using the GSA Franconia Warehouse Complex for the FBI's new home. Access to Multimodal Transportation

- Metro Blue Line with Yellow Line Rush
- VRE Fredericksburg Line
- 1/3 mile, 5' wide, concrete walking trail connecting the Joe Alexander Transportation Center to the GSA parcel
- Fairfax Connector
- Metrobus
- OmniRide (bus service from Prince William County)
- TAGS shuttle
- I-95 Express Lanes with connection to I-395 HOV lanes
- I-495 Express Lanes

Economic Development

- Developable land adjacent GSA parcel available for future growth
- GSA parcel has direct accessibility from multiple roads (Loisdale Road, Springfield Center Drive and Metropolitan Drive) to accommodate gated and non-gated entrances thus providing ample ease of access by FBI employees, contractors, vendors and visitors
- \bullet Less than $\frac{1}{2}$ mile to the completely renovated Springfield Town Center Area Amenities
- Ten hotels within ½ and 2½ miles of the GSA parcel
- · Wide variety of dining options
- · Broad selection of retail and support services
- Within walking distance of residential neighborhoods, providing convenient housing options for FBI employees

In addition to these great benefits we believe the site, and those around it, would benefit from the FBI's relocation without any impact to Springfield's historic and cultural resources. Thank you for your consideration of these benefits of selecting Springfield. We look forward to welcoming the FBI Headquarters to our community.

Sincerely,

Nancy-jo Manney, Executive Director Greater Springfield Chamber of Commerce 6434 Brandon Avenue, Suite 208 Springfield, VA 22150

703-866-3500

springfieldchamber.org

From: Linda M Rioux [Imrioux@comcast.net]
Sent: Sunday, October 05, 2014 9:17 PM

To: Patrick L. Wojahn; Fazlul Kabir; P. J. Brennan; Monroe Dennis; fbi-hqconsolidation@

gsa.gov

Subject: Regarding the FBI HQ Relocation

I live in College Park's District Two within 1 block of District One, so I am sending this note to all the College Park District 1 and District 2 Councilmen, as well as the address the FBI has posted for comments.

This is to let you know two things:

One, I am against the FBI relocating to Greenbelt, so if you're collecting folks' feelings on the matter, there's one more in the "nay" column for you. And in case you are interested in my reasons:

- 1. The Landover site is a much better choice for the FBI in terms of ease (and, I suspect, cost) of development & amount of space to work with/room to grow. By comparison with either of the other two sites under consideration, Landover is the option least likely to require a crowbar to fit the FBI into the proposed site.
- 2. The area around the Landover site is in greater need of whatever economic benefits may come from the FBI relocation.
- 3. The wetlands in the Greenbelt/College Park area should be left alone.

And two, I want to be sure you are all aware that currently, cutting through the Greenbelt Metro station is a hugely valuable safe route for area cyclists travelling between College Park and Greenbelt. Losing that route would force cyclists to take significantly longer and/or more treacherous routes when travelling between these two cities. Should the FBI end up coming to Greenbelt, I would urge you all to keep this in mind and do whatever you can to lobby for maintaining this route option to keep cycling a safe transportation choice for everyone in our area.

From: Linda M Rioux [mailto:lmrioux@comcast.net]

Sent: Monday, October 06, 2014 10:33 PM

To: 'Patrick L. Wojahn'; 'Fazlul Kabir'; 'P. J. Brennan'; 'Monroe Dennis'; 'fbi-hqconsolidation@

gsa.gov'

Subject: RE: Regarding the FBI HQ Relocation

Patrick and P.J.:

Thank you both for your responses. I am giving them thought.

Everyone else:

To be explicit, this constituent is still a "Nay" on the FBI in Greenbelt unless I follow up to this thread stating otherwise.

Best.

Linda Rioux (AKA Constantia)

From: "Linda M Rioux" < lmrioux@comcast.net>
Date: October 21, 2014 at 7:24:03 PM MDT

To: "'Patrick L. Wojahn'" <pwojahn@collegeparkmd.gov>, "'Fazlul Kabir'"

<fkabir@collegeparkmd.gov>, "'P. J. Brennan"

<pbre>pbrennan@collegeparkmd.gov>, "'Monroe Dennis'"

<mdennis@collegeparkmd.gov>, <fbi-hq-consolidation@gsa.gov>

Subject: RE: Regarding the FBI HQ Relocation

I've had time to think on additional information I've encountered since my original note below, and I'd like to say that I would still much prefer not seeing the FBI come to Greenbelt. BUT if the FBI does relocate to my area, I'd like to add the following to my original concerns included below:

The wetlands must be protected in perpetuity, according to recommendations from environmental experts. Green roofs, proper runoff control, whatever they say is needed. And controls much be put in place to prevent the FBI from getting around that commitment in the future to expand the developed portion of the property.

As I understand it, the developer is proposing to install a pedestrian/bike trail through the wet lands. While I consider safe bike routes vital to a healthy community, I have mixed feelings about this proposal because I am highly concerned about preventing damage to the wetlands. If this trail goes through, I recommend that the developer have a look at what has recently been done in Delaware just south of Cape Henlopen State Park: http://www.delawareonline.com/story/news/local/2014/06/18/gordons-pond-trail-dedicated/10734163/

A new raised trail has been installed through wetlands around Gordon Pond made of skid-resistant fiberglass slats that permit light to reach the ground below, minimizing the impact on the plants below. I have recently ridden this trail, and it's great. I believe this to be an option well worth examining.

Thanks for your attention—

Linda M. Rioux (AKA Constantia) Blackfoot Road, College Park (Still a registered voter J) From: "'Pada Spencer' via FBI HQ Consolidation" <fbi-hqconsolidation@

gsa.gov>

Date: October 11, 2014 at 12:21:54 PM MDT

To: "FBI-HQ-CONSOLIDATION@GSA.GOV" <FBI-HQCONSOLIDATION@

GSA.GOV>

Subject: NEPA SCOPING COMMENTS

Reply-To: Pada Spencer padamarketing@yahoo.com

MY COMMENTS ARE ADDRESSING WHY THE FBI HEADQUARTERS SHOULD BE AT THE LANDOVER SITE.

- q IT HAS 80 ACRES
- THERE IS ACREAGE ACROSS THE STREET WHERE THE CONDEMNED GLENARDEN APARTMENTS WHERE. IT HAS BEEN EMPTY FOR A WHILE AND A SECURITY GATE IS AROUND THE PEREMITER
- ${\bf q}\,$ YOU COULD CONSIDER HAVING AN OVERPASS WALKWAY AND MAKE THAT AREA FOR PARKING
- q THERE ARE TWO BUSES THAT PASS, THE A12 AND F14
- **q** TWO NEAR BY METRO STATIONS: NEW CARROLLTON AND LANDOVER
- q "THE BUS" TRAVELS BY TOO
- q IT IS NEAR RESTAURANTS AND THE BOULEVARD FOR SHOPPING
- g THE NEW HOSPITAL BEING BUILT IS ALSO IN THAT AREA

I HOPE THESE COMMENTS HELP.

TO ME THE LANDOVER SITE HAS MORE TO OFFER THAN THE GREENBELT SITE THAT COUNTY EXECUTIVE RUSHERN BAKER IS PUSHING TO GET THE FBI BUILT THERE.

From: Patrick L. Wojahn [mailto:pwojahn@collegeparkmd.gov]

Sent: Sunday, October 05, 2014 10:57 PM

To: Linda M Rioux; Fazlul Kabir; P. J. Brennan; Monroe Dennis; fbi-hgconsolidation@

gsa.gov

Subject: RE: Regarding the FBI HQ Relocation

Constantia,

Thanks for your thoughts on this. I have some information that you might not be aware of that might cause you to take another look at this issue.

First, I would argue that it's no easier to redevelop the Landover site than it is the Greenbelt site. The Greenbelt site is currently a parking lot that Metro is eager to redevelop. No "crowbar" is necessary, there's plenty of space available. And while the Greenbelt site sits almost immediately on top of a Metro station, the Landover site is about a mile away, and that mile is not at all walkable. The Landover site will at minimum require a shuttle and will likely add to the traffic mess in our area, as people will be much more likely just to drive there than they will be to take Metro and have to time their trips to catch a shuttle to the workplace.

It may be that there is greater poverty around the Landover area, but some of the areas around Greenbelt - such as the Franklin Park apartments and Beltway Plaza, are in sore need of redevelopment and have been focal points for crime and neglect over the years (although Franklin Park has improved in recent history, but still has problems with shoddy building and dangerous wiring that have caused numerous fires over the years). And our area offers many economic reasons why it would be better for the FBI to relocate here, not the least of which is proximity to the University, Ft. Meade, and the NSA.

Finally, there are many environmental reasons why Greenbelt is a better site. Besides the fact, as I mentioned above, that Greenbelt is the only truly transit-oriented site to place these 11,000 jobs, placing the FBI at Greenbelt WOULD preserve the wetlands. In fact, the wetlands would be established as a security buffer, meaning that no other development would go in there. There are only two things that would disturb the wetlands - a fence that would go in around the security buffer that would have a minimal impact on the wetlands, and a trail that the developers would build. The developers of the project have also promised significant environmental remediation, including preservation and restoration of the Narragansett Run and Indian Creek. Currently, the Greenbelt Station is a gigantic parking lot, which is terrible for the nearby wetlands. Any other development here - and some sort of development is likely to happen at some point in the future (although it could be decades away) - could have a much more negative impact on the wetlands than the FBI would.

Finally, as a cyclist I agree with you about the importance of this route through the Greenbelt Metro - however, the developer would maintain this as a route for cyclists (through the current Metro drive to Cherrywood Ln.), and would also build a bicycle path down to the South Core that would provide an easier route for us north College Park residents to get down to Lake Artemisia (down Branchville Road under Route 193) than risking our lives as we currently have to in order to cross Route 193. As mentioned before, the developer would also build a path through the wetlands that would also provide non-motorized access to Cherrywood Ln. As a whole, I think that the FBI coming to Greenbelt would improve bicycle access in this area.

Hope that helps clarify a few things. Please let me know if you have any questions.





Comments
My concern is regarding the handover site and the
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Please add me to the mailing list for this project.
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Comments.
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Name:
Affiliation: Address:
Email:

Comments may be emailed or mailed. Emails must be submitted by October 23, 2014 to fbi-hq-consolidation@gsa.gov. Subject line – NEPA Scoping Comment. Written comments must be postmarked by October 23, 2014.





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Affiliation: CATHOUC UNIVERSITY OF SURINGA-SCHOOL OF ANCHIPEGUNE Address: 6 ALDER LERF COURT, GERMONTOWN, MD GRADUSTE + PLONDING
Address: 6 ALDER LINE COURT, GERMANTOWN, MD GRADUATE + HONDING
Email: VIVIAN. bacarrezan e gmail. com Pabamon





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Name: Angles towards Affiliation: Tresident Costition of PGCC Oreans zetrons
Address: 708 Parry Ave. Capital Heights, MD 20743
Email: dbug latedwards 708@ Vevizour Not





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Name: Catherine Hollingsworth mentally friendly manner. Ut
Affiliation: Just Med Doble
Address: 9408 Van Buren St., Lanham MO 20706 dene on a larger scale Email: hollihamme yakoo.com
Comments may be emailed or mailed. Emails must be submitted by October 23, 2014 to fbi-hq-consolidation@gsa.gov. Subject line –
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of Resign the Greenbell site as a model

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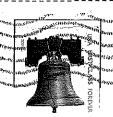
of development in Prince George's County. Make us

proved to be home to the FBI! At p/1114

Foluthers first

CAPITAL DISTRICT EXPLICACION

or exer 2014 PMTA



U.S. General Services Administration Attention: Nia Francis, OPDQ Project Manager National Capital Region 301 7th Street, SW, Room 4004 / Washington, DC 20407

20407

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Please add me to the mailing list for this project.	
Name: DAVID POWERS	
Affiliation: Address: 191 Rustline Leaf Place Rearneys ville, WU25430	
Affiliation: Address: 191 Rustline hear Place Rearneys ville WU25430 Email: Powers' @ ic. Fbi. gov	





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AGENCY CORRESPONDENCE

GSA National Capital Region Office of Planning & Design Quality



6 February 2015

Mr. David Maloney State Historic Preservation Officer District of Columbia Office of Planning 1100 4th Street, SW Suite 650 East Washington, DC 20024

Subject: Federal Bureau of Investigation Headquarters Consolidation and Exchange

Dear Mr. Maloney:

On behalf of the U.S. General Services Administration (GSA), I am writing to inform the D.C. State Historic Preservation Office (DCSHPO) of our initiation of consultation for the Federal Bureau of Investigation Headquarters Consolidation and Exchange (FBI Consolidation) under Section 106 of the National Historic Preservation Act (NHPA). GSA intends to relocate the headquarters of the Federal Bureau of Investigation (FBI), Washington, D.C., from its downtown location to a consolidated campus at a new and permanent neighboring suburban location (Undertaking). Specifically, the J. Edgar Hoover Federal Bureau of Investigation Building (FBI Building), located at 935 Pennsylvania Avenue, NW, will be exchanged for the new consolidated headquarters (40 USC § 581(c)3304). I am also initiating consultation on the Undertaking with suburban jurisdictions, including the Maryland and Virginia State Historic Preservation Offices.

The exchange process is a new and innovative approach to Federal real estate investment that partners Federal agencies with private developers to cost-effectively and efficiently meet both public and private sector redevelopment needs. In this particular case, the Undertaking's process would involve the acquisition of property and construction of a new facility in exchange for the FBI Building and site, the parcel of land (Squares 378 and 379) bounded to the south by Pennsylvania Avenue, to the west by Tenth Street, to the east by Ninth Street, and to the north by E Street, NW. Upon completion and acceptance of the new headquarters facility by GSA, the private developer would receive title to the property on Squares 378 and 379, offsetting the costs of the new FBI headquarters to the Federal government and therefore the American taxpayer.

A consolidated headquarters for the FBI is needed to support information sharing, collaboration and integration of staff and strategic priorities. The current headquarters houses only 52 percent of headquarters personnel, with the remainder of employees dispersed over multiple locations throughout the GSA's National Capital Region. The fragmentation that results from multiple locations diverts time and resources from investigations, hampers coordination and collaboration, decreases flexibility, and increases redundancy in operation and in the use and cost of space. Consolidation of all resources is required to eliminate these redundancies and provide significant space and cost savings.

U.S. General Services Administration 301 7th Street SW Washington, DC 20407-0001 www.gsa.gov In accordance with Section 110 of the NHPA, GSA contracted with Quinn Evans Architects in 2013 to prepare a Determination of Eligibility (DOE) report on the FBI Building. On March 6, 2014, your office concurred with the DOE finding that the building is not eligible for listing in the National Register of Historic Places (National Register). The building's site, however, is within the Pennsylvania Avenue National Historic Site District (NHS), within the boundaries of the L'Enfant Plan, and within or adjacent to National Register-listed historic districts and landmarks.

While the FBI Building is not eligible for listing in the National Register and is not identified as a contributing resource to the NHS, the Section 106 process for the Undertaking will take into account the potential for effects of the property's leaving Federal ownership and its possible redevelopment in the vicinity of historic properties. GSA invites the DCSHPO to participate in the consultation process.

After our consideration of the comments received at the December 18, 2014, agency information meeting, and given the Undertaking's multi-jurisdictional nature, the complexities of correlating regulatory processes, and the project schedule, GSA will establish, in consultation, a Programmatic Agreement (PA) pursuant to 36 CFR § 800.14(b)(1)(ii-iii, v). The PA will state the review processes and the many facets and phases of the Undertaking. GSA has consulted with the Advisory Council on Historic Preservation (Council). GSA will carry forth this process pursuant to 36 CFR Part § 800.8(a), in coordination with agency requirements under the National Environmental Protection Act (NEPA) and the development of the associated Environmental Impact Statement (EIS).

Attached to this letter please find an illustration of our preliminary Area of Potential Effect (APE) for the exchange of the FBI Building in Washington. For your information I am also providing the Fall 2014 Public Scoping Newsletter, as well as illustrations of the proposed APEs for the potential sites for the consolidated campus in Maryland and Virginia. We look forward to meeting with you and your staff on Tuesday, February 10th to discuss this effort and process. I will provide a preliminary list of consulting parties and would appreciate your guidance on individuals and interested parties who should be invited to participate.

Please note that we are planning subsequent agency as well as consulting party meetings and will develop a schedule as part of our ongoing consultation. If you have questions regarding the Undertaking or our proposed meeting on February 10th please contact me at 202.260.0663 or nancy.witherell@gsa.gov.

I look forward to seeing you next week.

Sincerely,

Nancy Witherell

Regional Historic Preservation Officer

National Capital Region

Kuhn, Patti

From: Joan Brierton - PCAB < joan.brierton@gsa.gov>

Sent: Tuesday, May 26, 2015 4:41 PM **To:** Kuhn, Patti; Anolik, Allison

Subject: Fwd: FBI Section 106 Strategy_Follow Up

Attachments: MOA_GSA NPS NCPC_July 1996.pdf; PADC 1978 MOA_ACHP.pdf; 36 CFR Part 800.pdf;

Square 491_Guidelines_NCPC Staff Recommendation.pdf; Square_254

_Guidelines_NCPC Staff Recommendation.pdf; FBI Consolidation_Section 106

_Consulting Parties_Preliminary_021015.docx

Here's what was shared with the DCSHPO. Consulting Party list is final attachment.

Joan M. Brierton Senior Preservation Specialist GSA Office of the Chief Architect Center for Historic Buildings 1800 F Street, NW Suite 5400 Washington, DC 20405 202.494.7868

----- Forwarded message -----

From: Joan Brierton - PCAB < joan.brierton@gsa.gov >

Date: Tue, Feb 10, 2015 at 4:56 PM

Subject: FBI Section 106 Strategy Follow Up

To: "Lewis, Andrew (OP)" < andrew.lewis@dc.gov >, David Maloney < david.maloney@dc.gov >

Cc: Nancy Witherell - WPDA < nancy.witherell@gsa.gov >, Kirsten Kulis < kkulis@achp.gov >, Bill Dowd - P

<wi>illiam.dowd@gsa.gov</ti>

Andy and David:

Many thanks for taking time this morning to talk through the proposed Section 106 Strategy for the FBI Headquarters Consolidation Project. A very helpful and productive meeting. With assistance from your office and the Advisory Council on Historic Preservation, GSA has worked very hard to be extremely thoughtful in its approach to this large, multifaceted effort, and looks forward to continuing to collaborate with you in consultation moving forward.

As promised, we are forwarding along the following documents in electronic format:

- 1996 PADC (GSA/NCPC/NPS) MOA
- 1978 PADC (ACHP) MOA
- 36 CFR Part 800
- NCPC Staff Recommendation for Square (Newseum)
- NCPC Staff Recommendation for Square 254
- Revised Consulting Party List (Preliminary)

Please let me know if there is a document you requested that I have not attached here and we will forward on immediately.

We expect to be back in touch very soon regarding the consultation schedule and to follow up on various items discussed today.

Again, we appreciate your time and guidance tremendously. As always, please do not hesitate to reach out to us at any time.

All the best --

Joan and Nancy

Joan M. Brierton Senior Preservation Specialist GSA Office of the Chief Architect Center for Historic Buildings 1800 F Street, NW Suite 5400 Washington, DC 20405 202.494.7868

On Wed, Feb 4, 2015 at 8:14 AM, Lewis, Andrew (OP) < andrew.lewis@dc.gov > wrote: Good Morning Nancy:

We'll see you next Tuesday. I sent an invite but am confirming with this email just in case.

Hope all's well,

C. Andrew Lewis Senior Historic Preservation Specialist DC State Historic Preservation Office Office of Planning 1100 4th Street, SW, Suite E650 Washington, DC 20024

Phone: 202-442-8841 Fax: 202-442-7638 andrew.lewis@dc.gov www.planning.dc.gov/hpo

----Original Message-----

From: Nancy Witherell - WPDC [mailto:nancy.witherell@gsa.gov]

Sent: Tuesday, February 03, 2015 4:45 PM

To: Lewis, Andrew (OP)

Cc: Joan Brierton; Kirsten B. Kulis; Nancy Witherell

Subject: FBI with GSA next Tuesday, Feb 10

Hi, Andy - thanks for your note. We'd like to take you up on your suggested Tuesday Feb 10 morning slot. Would 9:30 suit you and David?

thanks very much! See you next week, nancy

Nancy Witherell

nancy.witherell@gsa.gov Sent from my iPhone

GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE



March 6, 2014

Ms. Nancy Witherell Regional Historic Preservation Officer Office of Planning & Design Quality U.S. General Services Administration 301 7th Street, SW, Room 4004 Washington, DC 20407

RE: SHPO Comments on the Federal Bureau of Investigation Determination of Eligibility Form

Dear Ms. Witherell:

Thank you for providing the DC State Historic Preservation Office (SHPO) with a Determination of Eligibility (DOE) Form for the J. Edgar Hoover Federal Bureau of Investigation Building (FBI Building) located at 935 Pennsylvania Avenue, NW. We very much appreciate the thoroughness of the research and analysis that clearly went into preparing the very extensive DOE Form and its supporting illustrations. We also appreciate that GSA arranged a site visit for us to inspect the property on January 17, 2014. Based upon our review of the DOE and the results of the site visit, we are hereby submitting our comments regarding the National Register of Historic Places eligibility of the FBI Building in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800.

Although the FBI Building is the first purpose-built headquarters for the FBI, the DOE recommends that the property is not eligible for listing in the National Register of Historic Places. To summarize in the broadest, most general terms, the DOE recommends that the FBI Building is:

- Not eligible under Criterion A because the relative majority of significant events associated with the FBI occurred prior to construction of the FBI Building;
- Not eligible under Criterion B based upon association with J. Edgar Hoover because the building was not completed until after his death;
- Not eligible under Criterion C because the building is "not distinctive" as an example of Brutalism or a notable example of the work of C.F. Murphy and Stanislaw Z. Gladych, Architects;
- Not eligible under Criterion D due to being unlikely to yield archaeological information associated with history or prehistory; and
- Not eligible under Criterion Consideration G because there is no basis to establish that the thirtynine year old building is of "exceptional importance."

Ms. Nancy Witherell SHPO Comments on the Federal Bureau of Investigation Determination of Eligibility Form March 6, 2014 Page 2

In addition to supporting the findings listed above, the DOE analyzes other relevant points that are critical factors in evaluating the potential significance of the FBI Building including its contribution to the redevelopment of Pennsylvania Avenue; its relationship to the goals of the Pennsylvania Avenue Advisory Committee (PAAC); alterations that have affected the integrity of the property; the building's very extended design review process; critical reception; comparable examples of Brutalism; and other pertinent topics. In each of these instances, the conclusions bolster the claim that the FBI Building does not meet National Register Criteria. Also of note, the DOE clarifies that the FBI Building does not fall within the Pennsylvania Avenue National Historic Site's Period of Significance (1791-1962) and, therefore, is not a contributing element of the surrounding historic district.

After careful consideration of the information provided and first-hand inspection of the existing building conditions, we concur with GSA's determination that the J. Edgar Hoover Federal Bureau of Investigation Building is not eligible for listing in the National Register of Historic Places. As a result, no further consultation with our office regarding the eligibility of the FBI Building will be necessary.

If you should have any questions or comments, please contact me at <u>david.maloney@dc.gov</u> or 202-442-8850 or Andrew Lewis at <u>andrew.lewis@dc.gov</u> or 202-442-8841. Otherwise, thank you for providing this opportunity to comment.

Sincerely,

David Maloney

DC State Historic Preservation Officer

13-674



Maryland Department of Planning Maryland Historical Trust

August 17, 2015

Nancy Witherell Regional Historic Preservation Officer GSA National Capital Region Office of Planning and Design Quality 301 7th Street, SW Washington DC 20407

Re:

Proposed Federal Bureau of Investigation (FBI) Headquarters Consolidation

Prince George's County, Maryland

Dear Ms. Witherell:

Thank you for your recent letter formally initiating consultation with the Maryland Historical Trust (Trust) for the above-referenced undertaking, pursuant to Section 106 of the National Historic Preservation Act. Trust staff appreciated the opportunity to attend the project's first Consulting Parties meeting on June 16, 2015. The meeting provided us with a good understanding of the project scope, schedule, and anticipated path for completing Section 106 consultation.

We understand that GSA proposes to consolidate components of the FBI Headquarters into a rentable facility (up to 2.1 million square feet) to provide secure space to meet program requirements. GSA is examining three site alternatives, including two located in Maryland (Greenbelt and Landover) and one in Virginia. The Trust examined the preliminary information presented in your letter regarding areas of potential effect and known resources for the two Maryland alternatives. Information compiled to date does not suggest that either Maryland site will have substantive historic preservation or archeological resource issues. Since the height of the new buildings is still unknown, GSA will need to reexamine areas of potential effect once that information is available, particularly for the Greenbelt site. As noted in your letter, the Greenbelt Historic District, a National Historic Landmark, is situated approximately ½ mile north east of the Greenbelt site alternative. As GSA develops its project plans, we await further consultation with GSA regarding the area of potential effects and level of effort needed to identify and evaluate historic and archeological resources, for the Maryland site alternatives, as applicable.

We look forward to working with GSA and the other consulting parties to complete the Section 106 consultation for this undertaking, as planning proceeds. If you have questions or require further assistance, please contact me at 410-514-7631 / beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Beth Cole

Administrator, Project Review & Compliance

Maryland Historical Trust

Both Cole

BC/201501953

cc: Patti Kuhn (Louis Berger)

Howard Berger (M-NCPPC, Prince George's County)



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward Secretary of Natural Resources 2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan Director Tel: (804) 367-2323 Fax: (804) 367-2391 www.dhr.virginia.gov

October 7, 2014

U.S. General Services Administration - NCR Public Buildings Service Office of Planning and Design Quality Attention: Nia Francis, Project Manager 301 7th Street SW, Room 4004 Washington, D.C. 20427

Re: Section 106 Compliance for FBI Headquarters Consolidation

Virginia

DHR File No. 2014-1093

Dear Ms. Francis.

On September 8, 2014, the Virginia Department of Historic Resources (DHR) received information pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We understand that the General Services Administration is preparing an EIS for the consolidation of the FBI Headquarters and exchange of the J. Edgar Hoover Building parcel. From your letter, we also understand that GSA intends to partially fulfill the Section 106 public notification and consultation requirements through the NEPA scoping process

It is our opinion that this undertaking has the potential to impact historic properties. We request that GSA continue to consult with DHR as the project progresses. Should you have additional questions, please contact me at (804) 482-6084, or via email at andrea.kampinen@dhr.virginia.gov.

Sincerely,

Andrea Kampinen

Andrea Kampinen

Architectural Historian, Office of Review and Compliance



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward Secretary of Natural Resources 2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan Director Tel: (804) 367-2323 Fax: (804) 367-2391 www.dhr.virginia.gov

June 12, 2015

Ms. Nancy Witherell U.S. General Services Administration – NCR Office of Planning and Design Quality 401 7th Street SW, Room 4004 Washington, D.C. 20427

Re: FBI Headquarters Consolidation – Initiation of Section 106 Compliance

Virginia

DHR File No. 2014-1093

Dear Ms. Witherell,

On May 15, 2015, the Virginia Department of Historic Resources (DHR) received information pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. We understand that the General Services Administration (GSA) is coordinating the relocation of the Federal Bureau of Investigation (FBI) Headquarters from its downtown location to a consolidated campus at a new suburban location. Specifically, the J. Edgar Hoover Building at 935 Pennsylvania Avenue NW in Washington, D.C., will be exchanged for the headquarters.

In Virginia, an alternative site under consideration is located in Springfield, Fairfax County. The GSA Franconia Warehouse Complex (DHR ID#029-5876) contains two warehouses built in 1953. GSA has defined the Area of Potential Effects (APE) surrounding the site as a 0.25 mile radius. Several post-1950 subdivisions fall within the APE. At this early stage in consultation, we concur with your APE. Should the Fairfax County site be selected as the preferred alternative for the new consolidated headquarters, we would request architectural survey within the APE.

We look forward to participating in the first consulting parties meeting on June 16th. Should you have additional questions, please contact me at (804) 482-6084, or via email at andrea.burke@dhr.virginia.gov.

Sincerely,

Andrea Burke

Indrea Burker

Architectural Historian, Review and Compliance Division

Van Dyke, Susan

From: Greg Golden -DNR- <greg.golden@maryland.gov>

Sent: Thursday, February 12, 2015 12:20 PM

To: Van Dyke, Susan Cc: Van Dyke, Susan

Subject: MD DNR natural resources scoping information (RTE species and fisheries/aquatics)

Re: FBI Relocation Project Re: EIS Biological Resources Information

Categories: REFERENCE

Susan:

Thank you for your request of natural resources scoping information for the two sites in Maryland under consideration for the FBI Relocation Project, and for your patience as we collected and confirmed the necessary information. The two sites include: the Greenbelt Metro Station located near the intersection of Interstate Highways 95 and 495 in Prince George's County (Greenbelt Station Beltway Exit 24), and the former Landover Mall site along Brightseat Road and near Landover Road (MD 202) near Beltway Exit 17, in Landover, Prince George's County.

Our DNR Wildlife and Heritage Service has provided the following information on rare, threatened, and endangered species for the two Maryland sites being considered for this project:

For the Greenbelt Metro site, the Wildlife and Heritage Service's Natural Heritage database indicates that there is a record for a population of state-listed endangered Trailing Stitchwort (*Stellaria alsine*) occurring in the floodplain of Indian Creek, adjacent to the existing Greenbelt MARC/Metrorail Station. Any work in this area should incorporate protection measures to help preserve the braided stream network and the floodplain/bottomland community. Stringent adherence to all appropriate best management practices for sediment and erosion control is also recommended. While we don't provide exact locations of Rare, Threatened, and Endangered (RT&E) species in public documents, we do agree that it is appropriate to name the Stellaria in public documents associated with this project, including the EIS document.

For the Landover Mall site, There is a record for the Purple Passionflower (*Passiflora incarnata*) from 1990 that was located on the roadside of nearby Brightseat Road and may possibly still exist, however, there is the likelihood that this population is introduced and therefore doesn't warrant protection. The current status of this species in Maryland is "SU" (uncertain). We mention this now mainly to cover all bases in case of previous coordination that may have mentioned this species when it was listed in Maryland. In summary, we have no current RT&E concerns for the area in and around Landover Mall.

Please note, the distribution and location of the individual stellaria plants can vary over time in the Indian Creek floodplain and stream network habitat. We are available to discuss and work with the project consultants further on evaluating and assessing the characteristics of typical or current plant distribution, but conservation measures in any case will focus on the protection measures of the overall floodplain habitat referenced above, to include optimized stormwater management and other water quality measures. We believe such protection measures are very feasible and advantageous under a well planned and managed re-development approach near Indian Creek floodplains.

Regarding fisheries and aquatic resources, we provide the following information:

No Marine resources are located in the area.

Indian Creek and the smaller headwater streams in the vicinity of both Maryland sites are designated as Use I streams (Water Contact Recreation and Protection of Nontidal Warmwater Aquatic Life). Generally, no instream work is permitted in Use I streams during the period of March 1 through June 15, inclusive, during any year.

Anadromous fish species, including alewife herring, blueback herring and sea lamprey, have been documented migrating and spawning in Indian Creek stream reaches in the vicinity of Greenbelt Metro Station, and restoration efforts have targeted the improvement of fish passage access to and through these Indian Creek reaches. Such anadromous fish can also be found further downstream of the two Maryland sites, in

other reaches of the Anacostia River system. In perennial stream reaches in the vicinity of both Maryland sites (Greenbelt and Landover) communities of several warmwater fish species can typically be found. A Maryland Biological Stream Survey (MBSS) sampling station in the vicinity of Greenbelt documents the following warmwater species: American eel, blacknose dace, tessellated darter, eastern mudminnow, fallfish, redfin pickerel, white sucker, creek chubsucker, least brook lamprey, redbreast sunfish, longnose dace, pumpkinseed sunfish, and swallowtail shiner. The same or similar warmwater fish species would be expected in streams near the Landover site.

There are records of native crayfish in the region which are designated as "Greatest Conservation Need". Species of Greatest Conservation Need are those animals, both aquatic and terrestrial, that are at risk or declining in Maryland. It is crucial that water quality and hydrology be maintained in local stream reaches. There is importance to optimally managing and controlling sedimentation and avoiding introduction of man-made debris into local stream reaches.

The fisheries resources above will be adequately protected by the instream work restriction period referenced above, stringent sediment and erosion control methods, and other Best Management Practices typically used for protection of stream resources.

Our Department programs have participated in many conservation, restoration, and retrofit activities over many years in the Anacostia River watershed and other nearby Prince George's County watersheds. It is important to emphasize that both of the Maryland sites in this study clearly represent excellent opportunities for well planned and managed redevelopment in existing urban and suburban settings, with associated habitat, hydrology, and water quality restoration and retrofit elements. Such wisely managed redevelopment can benefit certain types of local natural resources, including all of those specific natural resource elements referenced above at these two sites. We recommend and support that the project study include careful evaluation of environmentally sensitive design and building elements along with restoration and retrofit opportunities.

If you have any questions on the information above, please contact me at your convenience.

Greg Golden
Project Review Division
Integrated Policy and Review Unit
MD Department of Natural Resources
410-260-8331

please note my new email address: greg.golden@maryland.gov

Van Dyke, Susan

From: Lori Byrne -DNR- <lori.byrne@maryland.gov>

Sent: Friday, June 19, 2015 11:47 AM

To: Greg Golden -DNR-Cc: Van Dyke, Susan

Subject: Re: follow up Re: MD DNR natural resources scoping information (RTE species and

fisheries/aquatics) Re: FBI Relocation Project Re: EIS Biological Resources Information

Categories: REFERENCE

Hi Susan and Greg,

For this project area, the WHS is not going to have any concerns for occurrences of the Northern Long-eared Bat. Thanks for checking.

Lori Byrne

On Fri, Jun 19, 2015 at 11:31 AM, Greg Golden -DNR- <<u>greg.golden@maryland.gov</u>> wrote: Susan,

Thanks for your patience while I was out of town. I spoke with DNR's Wildlife and Heritage Service late this week on this topic. They have recently framed up and formulated their review approach for the northern long-eared bat. Although I was able to give you some basic aspects verbally by phone today, for specific details and anything you would like to put into written reports, you will want to correspond with Lori Byrne directly. Her email address is included here, and Lori's phone # is 410-260-8573.

thanks greg

Greg Golden
Project Review Division
Integrated Policy and Review Unit
MD Department of Natural Resources
410-260-8331

please note my new email address: greg.golden@maryland.gov

Hey Greg,

It's been a while since we last spoke – How is everything?

I was hoping you could help me out with something concerning the same sites/EIS we were talking about in our prior emails. The northern long-eared bat recently (May 2015) became threatened and I was hoping if you could let me know if there are any populations within or close to the project areas. I don't think they would have been included in the last consultation we had, but if they were and they just aren't at the project areas, let me know.

Thank you!

Susan

Susan Van Dyke

Environmental Scientist | Planning, Facilities, and Resource Management

phone +1.202.303.2627

email svandyke@louisberger.com

web louisberger.com

Louis Berger

1250 23rd Street, NW | Washington | District of Columbia | USA | 20037







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Lori A. Byrne Environmental Review Coordinator MD DNR Wildlife and Heritage Service Tawes State Office Building 410-260-8573

FBI Consolidation

IPaC Trust Resource Report

Generated September 01, 2015 09:41 AM MDT



US Fish & Wildlife Service

IPaC Trust Resource Report



Project Description

NAME

FBI Consolidation

PROJECT CODE

BGZL7-WHCQZ-EWPDJ-6OCQZ-UKGDCU

LOCATION

District of Columbia County, District of Columbia

DESCRIPTION

FBI Consolidation - JEH Building



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

Chesapeake Bay Ecological Services Field Office

177 Admiral Cochrane Drive Annapolis, MD 21401-7307 (410) 573-4599

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the <u>Endangered Species Program</u> and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under Section 7 of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

Mammals

Northern Long-eared Bat Myotis septentrionalis

Threatened

CRITICAL HABITAT

No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A0JE

Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

Migratory Birds

Birds are protected by the <u>Migratory Bird Treaty Act</u> and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

American Oystercatcher Haematopus palliatus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G8

American Bittern Botaurus lentiginosus

Bird of conservation concern

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3

Bald Eagle Haliaeetus leucocephalus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

Black-billed Cuckoo Coccyzus erythropthalmus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI

Blue-winged Warbler Vermivora pinus

Bird of conservation concern

Season: Breeding

Cerulean Warbler Dendroica cerulea

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09I

Fox Sparrow Passerella iliaca

Bird of conservation concern

Season: Wintering

Gull-billed Tern Gelochelidon nilotica

Bird of conservation concern

Season: Breeding

Kentucky Warbler Oporornis formosus

Bird of conservation concern

Season: Breeding

Least Bittern Ixobrychus exilis

Bird of conservation concern

Season: Breeding

Pied-billed Grebe Podilymbus podiceps

Bird of conservation concern

Season: Breeding

Prairie Warbler Dendroica discolor

Bird of conservation concern

Season: Breeding

Prothonotary Warbler Protonotaria citrea

Bird of conservation concern

Season: Breeding

Purple Sandpiper Calidris maritima

Bird of conservation concern

Season: Wintering

Page 4

Red-headed Woodpecker Melanerpes erythrocephalus

Bird of conservation concern

Year-round

Rusty Blackbird Euphagus carolinus Bird of conservation concern

Season: Wintering

Saltmarsh Sparrow Ammodramus caudacutus

Bird of conservation concern

Year-round

Short-billed Dowitcher Limnodromus griseus

Bird of conservation concern

Season: Wintering

Short-eared Owl Asio flammeus Bird of conservation concern

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD

Snowy Egret Egretta thula

Bird of conservation concern

Season: Breeding

Wood Thrush Hylocichla mustelina Bird of conservation concern

Season: Breeding

Worm Eating Warbler Helmitheros vermivorum

Bird of conservation concern

Season: Breeding

Refuges

Any activity proposed on <u>National Wildlife Refuge</u> lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

Wetlands

Impacts to <u>NWI wetlands</u> and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate <u>U.S. Army Corps of Engineers District</u>.

DATA LIMITATIONS

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

DATA EXCLUSIONS

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

DATA PRECAUTIONS

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Wetland data is unavailable at this time.

FBI Consolidation

IPaC Trust Resource Report

Generated September 01, 2015 09:44 AM MDT



US Fish & Wildlife Service

IPaC Trust Resource Report



Project Description

NAME

FBI Consolidation

PROJECT CODE

DDCQA-BN3VF-DTLB4-QFJ5N-YRZAWM

LOCATION

Prince George's County, Maryland

DESCRIPTION

FBI Consolidation - Greenbelt Site



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

Chesapeake Bay Ecological Services Field Office

177 Admiral Cochrane Drive Annapolis, MD 21401-7307 (410) 573-4599

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the <u>Endangered Species Program</u> and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under <u>Section 7</u> of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

Mammals

Northern Long-eared Bat Myotis septentrionalis

Threatened

CRITICAL HABITAT

No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A0JE

Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

Migratory Birds

Birds are protected by the <u>Migratory Bird Treaty Act</u> and the Bald and Golden Eagle Protection Act.

Any activity which results in the take of migratory birds or eagles is prohibited unless authorized by the U.S. Fish and Wildlife Service (1). There are no provisions for allowing the take of migratory birds that are unintentionally killed or injured.

You are responsible for complying with the appropriate regulations for the protection of birds as part of this project. This involves analyzing potential impacts and implementing appropriate conservation measures for all project activities.

American	Oystercatch	1er Haematopus palliatus
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Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G8

American Bittern Botaurus lentiginosus

Bird of conservation concern

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3

Bald Eagle Haliaeetus leucocephalus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

Black-billed Cuckoo Coccyzus erythropthalmus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI

Blue-winged Warbler Vermivora pinus

Bird of conservation concern

Season: Breeding

Cerulean Warbler Dendroica cerulea

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09I

Fox Sparrow Passerella iliaca

Bird of conservation concern

Season: Wintering

Gull-billed Tern Gelochelidon nilotica

Bird of conservation concern

Season: Breeding

Kentucky Warbler Oporornis formosus

Bird of conservation concern

Season: Breeding

Least Bittern Ixobrychus exilis

Bird of conservation concern

Season: Breeding

Pied-billed Grebe Podilymbus podiceps

Bird of conservation concern

Season: Breeding

Prairie Warbler Dendroica discolor

Bird of conservation concern

Season: Breeding

Prothonotary Warbler Protonotaria citrea

Bird of conservation concern

Season: Breeding

Purple Sandpiper Calidris maritima

Bird of conservation concern

Page 4

Season: Wintering

Red Knot Calidris canutus rufa

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DM

Red-headed Woodpecker Melanerpes erythrocephalus

Year-round

Rusty Blackbird Euphagus carolinus

Season: Wintering

Saltmarsh Sparrow Ammodramus caudacutus

Year-round

Short-billed Dowitcher Limnodromus griseus

Season: Wintering

Short-eared Owl Asio flammeus

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD

Snowy Egret Egretta thula

Season: Breeding

Wood Thrush Hylocichla mustelina

Season: Breeding

Worm Eating Warbler Helmitheros vermivorum

Season: Breeding

Bird of conservation concern

Refuges

Any activity proposed on <u>National Wildlife Refuge</u> lands must undergo a 'Compatibility Determination' conducted by the Refuge. If your project overlaps or otherwise impacts a Refuge, please contact that Refuge to discuss the authorization process.

There are no refuges within this project area

Wetlands

Impacts to <u>NWI wetlands</u> and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes.

Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate <u>U.S. Army Corps of Engineers District</u>.

DATA LIMITATIONS

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

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Wetland data is unavailable at this time.

FBI Consolidation

IPaC Trust Resource Report

Generated September 01, 2015 09:33 AM MDT



US Fish & Wildlife Service

IPaC Trust Resource Report



Project Description

NAME

FBI Consolidation

PROJECT CODE

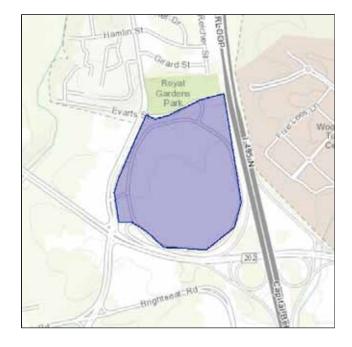
S2PH4-LBIAZ-EWZA7-2DHNZ-FJBYUE

LOCATION

Prince George's County, Maryland

DESCRIPTION

FBI Consolidation - Landover Site



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

Chesapeake Bay Ecological Services Field Office

177 Admiral Cochrane Drive Annapolis, MD 21401-7307 (410) 573-4599

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the <u>Endangered Species Program</u> and should be considered as part of an effect analysis for this project.

This unofficial species list is for informational purposes only and does not fulfill the requirements under <u>Section 7</u> of the Endangered Species Act, which states that Federal agencies are required to "request of the Secretary of Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action." This requirement applies to projects which are conducted, permitted or licensed by any Federal agency.

A letter from the local office and a species list which fulfills this requirement can be obtained by returning to this project on the IPaC website and requesting an Official Species List from the regulatory documents section.

Mammals

Northern Long-eared Bat Myotis septentrionalis

Threatened

CRITICAL HABITAT

No critical habitat has been designated for this species.

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=A0JE

Critical Habitats

Potential effects to critical habitat(s) within the project area must be analyzed along with the endangered species themselves.

There is no critical habitat within this project area

Page 3

Migratory Birds

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American	Oystercatcher	Haematopus palliatus
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Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0G8

American Bittern Botaurus lentiginosus

Bird of conservation concern

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0F3

Bald Eagle Haliaeetus leucocephalus

Bird of conservation concern

Year-round

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

Black-billed Cuckoo Coccyzus erythropthalmus

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HI

Blue-winged Warbler Vermivora pinus

Bird of conservation concern

Season: Breeding

Cerulean Warbler Dendroica cerulea

Bird of conservation concern

Season: Breeding

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B09I

Fox Sparrow Passerella iliaca

Bird of conservation concern

Season: Wintering

Gull-billed Tern Gelochelidon nilotica

Bird of conservation concern

Season: Breeding

Kentucky Warbler Oporornis formosus

Bird of conservation concern

Season: Breeding

Least Bittern Ixobrychus exilis

Bird of conservation concern

Season: Breeding

Pied-billed Grebe Podilymbus podiceps

Bird of conservation concern

Season: Breeding

Prairie Warbler Dendroica discolor

Bird of conservation concern

Season: Breeding

Prothonotary Warbler Protonotaria citrea

Bird of conservation concern

Season: Breeding

Purple Sandpiper Calidris maritima

Bird of conservation concern

Season: Wintering

Red Knot Calidris canutus rufa

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0DM

Red-headed Woodpecker Melanerpes erythrocephalus

Year-round

Rusty Blackbird Euphagus carolinus

Season: Wintering

Saltmarsh Sparrow Ammodramus caudacutus

Year-round

Seaside Sparrow Ammodramus maritimus

Year-round

Short-billed Dowitcher Limnodromus griseus

Season: Wintering

Short-eared Owl Asio flammeus

Season: Wintering

https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD

Snowy Egret Egretta thula

Season: Breeding

Wood Thrush Hylocichla mustelina

Season: Breeding

Worm Eating Warbler Helmitheros vermivorum

Season: Breeding

Bird of conservation concern

174

Refuges

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There are no refuges within this project area

Wetlands

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Project proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate <u>U.S. Army Corps of Engineers District</u>.

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Wetland data is unavailable at this time.

FBI Consolidation

IPaC Trust Resource Report

Generated September 01, 2015 09:39 AM MDT



US Fish & Wildlife Service

IPaC Trust Resource Report



Project Description

NAME

FBI Consolidation

PROJECT CODE

EP6TB-EQUPZ-ASNC2-OZJ6L-YOC22A

LOCATION

Fairfax County, Virginia

DESCRIPTION

FBI Consolidation - Springfield Site



U.S. Fish & Wildlife Contact Information

Species in this report are managed by:

Virginia Ecological Services Field Office 6669 Short Lane

Gloucester, VA 23061-4410 (804) 693-6694

Endangered Species

Proposed, candidate, threatened, and endangered species that are managed by the <u>Endangered Species Program</u> and should be considered as part of an effect analysis for this project.

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Mammals

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Threatened

CRITICAL HABITAT

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Season: Wintering

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https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B008

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Season: Wintering

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https://ecos.fws.gov/speciesProfile/profile/speciesProfile.action?spcode=B0HD

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Wood Thrush Hylocichla mustelina

Season: Breeding

Season: Breeding

Worm Eating Warbler Helmitheros vermivorum

Season: Breeding

Bird of conservation concern

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Wetland data is unavailable at this time.



Denise Decker - WPT-C <denise.decker@gsa.gov>

FBI HQ Consolidation Project

Masog, **Tom** <Tom.Masog@ppd.mncppc.org>
To: Denise Decker - WPT-C <denise.decker@gsa.gov>

Tue, Jan 27, 2015 at 12:42 PM

Ms. Decker

Please accept this as confirmation that the scoping of the FBI HQ Consolidation EIS is acceptable to the Prince George's County Planning Department. At the time of discussion, the list of intersections to be studied is adequate. All assumed developments in the area and assumed road improvements are also correct as of this time. All underlying assumptions have been discussed thoroughly, and are acceptable.

Tom Masog, Supervisor, Transportation Planning Section

Countywide Planning Division, Prince George's Planning Department

(301) 952-5216



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

James T. Smith, Jr., Secretary Melinda B. Peters, Administrator

December 22, 2014

RE:

Prince George's County

FBI Headquarters Consolidation I-95 / MD 193 – Greenbelt Site SHA Tracking No. 14APPG007XX I-95 / MD 202 – Landover Site SHA Tracking No. 14APPG050XX

Traffic Impact Study

Mr. Mark Berger Louis Berger, Inc. 1250 23rd Street, NW Washington, DC 20037

Dear Mr. Berger:

Thank you for the opportunity to review the "Trip Generation Supporting Reports", received October 28, 2014; the "FBI Headquarters Consolidation Project Proposed Methods for Modeling Transportation Impacts at Greenbelt Site", and "FBI Headquarters Consolidation Project Proposed Methods for Modeling Transportation Impacts at Landover Site", received on December 17, 2014. The documents outline the scope of the traffic analyses to be performed by GSA for the proposed FBI headquarters consolidation project as alternative sites are assessed in NEPA studies. The Maryland State Highway Administration (SHA) review is complete and we are pleased to respond.

The review determined that the SHA concurs with the trip generation methodology, trip distributions, study areas, modal splits, analysis years, and analysis methods outlined for the two sites. This approval is subject to the proposed development advancing through the Maryland National Capital Park and Planning Commission (MNCP&PC) process for approval of the background and planned roadway improvements, as well as approval of the analysis years by the Federal Highway Administration (FHWA), if necessary, for the NEPA studies and Interstate Access Point Approval (IAPA). The SHA will continue to provide direction during the planning, design, and permitting processes to GSA and the developers associated with the Greenbelt and Landover sites. The coordination will ensure that the proposed trip rates are not exceeded and that the appropriate analyses are completed using Highway Capacity Manual based software.

Mr. Mark Berger 14APPG007XX 14APPG050XX Page No. 2 December 22, 2014

The SHA looks forward to continuing coordination with GSA regarding the NEPA studies related to the consolidation of the FBI headquarters. If you have any questions, please do not hesitate to contact me or Mr. Pranoy Choudhury, Regional Engineer at 410-545-5600.

Sincerely,

Steven D. Foster, Chief/Development Manager Access Management Division

SDF/jfl/er

cc: Mr. Armen Abrahamian, Prince George's County

Mr. Eric Beckett, SHA RIPD

Mr. Pranoy Choudhury, SHA AMD

Ms. Rola Daher. SHA DSED

Ms. Mary Dietz, SHA RIPD

Mr. Bob French, SHA CPD

Mr. Adam Greenstein, SHA District 3 Traffic

Mr. Scott Holcomb, SHA DSED

Mr. Jeffrey Lawrence, KCI Technologies, Inc.

Mr. Subrat Mahapatra, SHA DSED

Mr. Tom Masog, Maryland National Capital Parks and Planning Commission

Mr. Eric Marabello, SHA, Office of Highway Development

Mr. Venu Nemani, SHA District 3 Traffic

Mr. Johnson Owusu-Amoako, SHA CPD

Mr. Robert Piazza, SHA DSED

Mr. Saed Rahwanji, SHA TDSD

Ms. Erica Rigby, SHA AMD

Mr. Dave Rodgers, SHA RIPD

Ms. Tina Saxon, SHA RIPD

Mr. Errol Stoute, SHA TDSD

Mr. Morteza Tadayon, SHA DSED

Ms. Cipriana Thompson, Prince George's County



Denise Decker - WPT-C <denise.decker@gsa.gov>

FW: FBI - GSE Site Growth Rate

Berger, Mark <mberger@louisberger.com>

Thu, Jan 15, 2015 at 2:23 PM

To: Nia Francis - WPDB <nia.francis@gsa.gov>, "Denise Decker (denise.decker@gsa.gov)"

<denise.decker@gsa.gov>, Mack Gaither - WPTB-C <mack.gaither@gsa.gov>

Cc: "Canan, Timothy" <tcanan@louisberger.com>, "Anolik, Allison" <aanolik@louisberger.com>, "Zurawski, Carol A" <czurawski@louisberger.com>

Nia and company – VDOT accepts the terms

See below

Mark Berger AICP

Principal Transportation Planner | Planning Facilities and Resource Management

direct +1.202.303.2787

mobile +1.202.570.9523

email mberger@louisberger.com

web louisberger.com

Louis Berger

1250 23rd Street NW | Washington | DC | 20037 | USA

Celebrating 60 Years

From: Kraucunas, Paul J. (VDOT), P.E. [mailto:Paul.Kraucunas@VDOT.Virginia.gov]

Sent: Thursday, January 15, 2015 2:20 PM

To: Berger, Mark

Cc: Daniel Rathbone; Burke, Thomas W. (Thomas.Burke@fairfaxcounty.gov)

Subject: RE: FBI - GSE Site Growth Rate

Mark,

VDOT finds this scoping agreement acceptable, subject to the Fairfax County inputs on the pipeline development that should be included in the study.

Paul Kraucunas

Land Development Program Manager

From: Berger, Mark [mailto:mberger@louisberger.com]

Sent: Friday, January 09, 2015 2:28 PM **To:** Kraucunas, Paul J. (VDOT), P.E. **Subject:** RE: FBI - GSE Site Growth Rate

Paul,

Here is the latest scoping agreement – hope to finalize this by Monday with VDOT/Fairfax County. I will be at TRB Monday – Wednesday in many committee meetings next week, but will check my email when possible.

Mark

Mark Berger AICP

Principal Transportation Planner | Planning Facilities and Resource Management

direct +1.202.303.2787

mobile +1.202.570.9523

email mberger@louisberger.com

web louisberger.com

Louis Berger

1250 23rd Street NW | Washington | DC | 20037 | USA

Celebrating 60 Years

From: Kraucunas, Paul J. (VDOT), P.E. [mailto:Paul.Kraucunas@VDOT.Virginia.gov]

Sent: Friday, January 09, 2015 1:58 PM

To: Berger, Mark

Subject: FBI - GSE Site Growth Rate

Mark,

After discussion with Fairfax County, VDOT would suggest that you use a 0.58 growth rate for this project.

Thank you,

Paul

This message, including any attachments hereto, may contain privileged and/or confidential information and is intended solely for the attention and use of the intended addressee(s). If you are not the intended addressee, you may neither use, copy, nor deliver to anyone this message or any of its attachments. In such case, you should immediately destroy this message and its attachments and kindly notify the sender by reply mail. Unless made by a person with actual authority conferred by Louis Berger, the information and statements herein do not constitute a binding commitment or warranty by Louis Berger. Louis Berger assumes no responsibility for any misperceptions, errors or misunderstandings. You are urged to verify any information that is confusing and report any errors/concerns to us in writing.

Project Name & Applicant Team: FBI Headquarters Site Evaluation: J. Edgar Hoover Building Parcel Redevelopment Scenarios – General Services Administration (GSA)

Case Type & No. (PUD, LTR, etc.)

Street Address: 935 Pennsylvania Avenue NW

Current Zoning and/or Overlay District: Proposed D6-B1, Current DD/C4

Date of Filing:

Estimated Date of Hearing:

the FBI Headquarters and leased offices within the National Capital Region. Once a new site is selected, the winning developer will build the FBI a new facility and in exchange Consolidation, which will include an evaluation of the indirect impacts of exchanging the JEH building. Included in the EIS will be a traffic impact analysis that will evaluate the indirect transportation impacts of the JEH exchange. Indirect impacts will be based on reasonable foreseeable development scenarios (RFDS), which are not representative of will be awarded the J Edgar Hoover (JEH) parcel for redevelopment. As required by NEPA, GSA is preparing an environmental impact statement (EIS) for the FBI Headquarters Description of Project: The General Services Administration (GSA), in coordination with the Federal Bureau of Investigation (FBI), is seeking a new site for consolidation of developed by a private developer on the parcel in the foreseeable future. The RFDS provides a tool for GSA to use in the analysis of potential indirect impacts that may occur any developer's proposals. A RFDS is basically a "what-if" development scenario for future private redevelopment. It is GSA's estimate of what could be reasonably from the proposed action. Indirect impacts are defined by NEPA regulations as:

impacts that are "caused by the action and are later in time... but are still reasonably foreseeable" (40 C.F.R. §1508.8)

Indirect impacts include the environmental impacts that may occur from changes in land use or population density as a result of the proposed action. The development scenarios are a tool that GSA will use to project a conservative estimate of the transportation impacts from the development of the JEH parcel, for inclusion in the Environmental Impact Statement.

DDOT Comments/Action Items planning documents, as well as localized studies. See Section 3.1 of the CTR guidelines for more information. Planning Guidelines: The CTR will address how the proposed development considers the primary city-wide Strategic Planning Elements (Planning Documents)

Proposed Documents: Pennsylvania Avenue Plan, National Capital Planning Commission Comprehensive and Framework Plans, Old Post Office Redevelopment Transportation Study, and District of Columbia zoning regulations.

There are no other GSA projects planned within the Pennsylvania Avenue corridor other than the Old Post Office Redevelopment, which has already completed DDOT review.

DDOT Comments/Action Items	
2. Roadway Network, Capacity & Operations	Vehicle Trip Generation Assumptions

the assumptions and supporting documentation behind the proposed mode split. See Section 3.2.1 of the CTR **Guidelines:** Provide preliminary site-generated vehicle trips and mode split assumptions. In addition, provide guidelines for further information.

12/4/2013 - Wednesday, and 1/9/2014 - Thursday). The outbound flows will be calculated using the Institute of proposed JEH parcel redevelopment scenarios. It will also reflect the removal of the existing FBI trips from the existing JEH Building. The study will follow the assumptions provided by other traffic studies to determine the background trips generated by the nearby planned developments. The existing FBI trips will be determined by The trip generation will be based on new trips generated by nearby developments (background trips) and the using inbound JEH Building turnstile counts obtained from the FBI covering three days (11/12/2013 - Tuesday, percentages (AM - 93 percent entering/7 percent exiting and PM - 11 percent entering/89 percent exiting) Transportation (ITE) Engineers Trip Generation Manual Corporate Headquarters Land Use entering/exiting based on the peak AM hour between 6:30AM – 10:00AM and peak PM hour between 3:30PM – 7:00 PM).

second scenario a conservative estimate for residential use. Both redevelopment scenarios would include office Shopping Center and Apartment Land Uses. The details of the FBI trips removed and redevelopment scenario generated trips are listed below. The first scenario provides a conservative estimate for office use and the The two redevelopment scenarios will include a combination of residential and office land uses along with ground floor retail. The generated trips will be based on the ITE Trip Generation Manual General Office, and residential uses, plus ground floor retail.

Governmental HQ Office (JEH): Existing FBI person trips to be removed from the study area

•					
Source	Independent Variable	Time Period	Z	OUT	TOTAL
FBI Turnstile Counts	2,800,000 square feet	AM Peak	1,320	66	1,419
		PM Peak	145	1,173	1,318

Redevelopment Scenario # 1: Proposed new person trips added to the study area

General Office:	1,267,600 square feet	AM Peak	1,284	175	1,459
ITE Code #710		PM Peak	255	1,243	1,498
Apartment:	672 units	AM Peak	29	597	333
ITE Code #220		PM Peak	252	136	388
Shopping Center	161,800 square feet	AM Peak	130	6/	209
ITE Code #820		PM Peak	405	422	827
TOTAL		AM Peak	1,481	520	
		PM Peak	912	1,801	

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General Office:	451,000 square feet	AM Peak	295	77	639
ITE Code #710		PM Peak	66	485	583
Apartment:	1,000 units	AM Peak	66	395	494
ITE Code #220		PM Peak	369	199	268
Shopping Center	131,500 square feet	AM Peak	114	20	184
ITE Code #820		PM Peak	353	367	720
TOTAL		AM Peak	775	542	
		PM Peak	821	1,051	

Proposed preliminary mode split and supporting documentation: The FBI mode split is based on the current number of FBI employee vanpools and carpools, as well as the number of employees signed up for the transit subsidy. The future office and residential were calculated based on referencing the following sources:

- 2005 WMATA Development Survey
- 2010 State of the Commute Report
- 2013 State of the Commute Report
- 2010 American Community Survey (Census at Tract Level)
- Recent Local Development Traffic Impact Study (TIS) Reports in DC (The Wharf Phase I (2012) and Heritage Foundation (2013))
- Heritage Foundation TIS included a mode split survey of the Heritage Foundation and 236 Massachusetts Ave NW employees
- 2020 MWCOG Travel Demand Model
- District of Columbia Zoning Regulations
- U.S. Bureau of Labor Statistics
- 2013 1st Quarter Report by Commercial Real Estate Brokerage Association of Greater Washington, DC

used as a starting point and adjusted based on the projected future off-street parking supply and other sources. The 2020 MWCOG Travel Demand Model mode split projections and 2005 WMATA Development Survey was

Mode Share	FBI	Future Office	Future
			Residential/Retail
Vehicle	13.5%	17%	10%
Carpool	%5'8	11%	11%
Bicycle	%7	3%	%8
Walk	7%	2%	12%
Transit	%5/	%29	%65

The modal split integrated with person trips are shown below:

FBI Governmental HQ Office (JEH): Existing FBI person trips to be removed from the study area

I be covering that of the start is the person trips to be removed in our time start area	יב (זרוון). במוזמוון ליוון	אבו אח הו ווא ווא ווארושל	ווסעכם וו טווו נוופ זנמט	ıy alca
	AM IN	AM OUT	PM IN	PM OUT
Vehicle	178	13	20	158
Carpool	112	6	12	100
Bicycle	27	2	3	23
Walk	13	1	1	12
Transit	066	74	109	880
TOTAL	1,320	66	145	1,173

Redevelopment Scenario # 1: Proposed new person trips added to the study area (Emphases on office use)	1: Proposed new pe	erson trips added to t	he study area (Emph	ases on office use)
Travel Mode	AM IN	AM OUT	PM IN	PM OUT
Vehicle	238	79	109	267
Carpool	163	25	100	198
Bicycle	54	33	09	82
Walk	49	45	84	95
Transit	226	321	258	1,162
TOTAL	1,481	220	912	1,801

Redevelopment Scenario # 2: Proposed new person trips added to the study area (Emphases on residential

nse)

Travel Mode	AM IN	AM OUT	PM IN	PM OUT
Vehicle	117	09	89	139
Carpool	85	09	90	116
Bicycle	34	39	61	09
Walk	37	22	68	78
Transit	502	326	492	829
TOTAL	775	542	821	1,051

<u>Vehicle Site Access</u> **Guidelines:** If vehicle access is needed, at a minimum the CTR will provide locations of access point(s) and desired access controls (full, right-in/right-out, etc.). See Section 3.2.2 of the CTR guidelines for any further requirements.

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Access Location(s): Along 10 th Street NW between Pennsylvania Avenue and E Street NW. There might also be access at the 9 th and D Streets NW intersection during off-peak hours. Access Control: Full access at the locations described above Existing Curb cuts utilized: 10 th Street access to the underground garage Existing curb cuts abandoned: Two E Street NW underground garage access points and the 9 th Street Mid-block underground garage access Proposed curb cuts: New driveway at 9 th and D Streets NW Curb cut width and radii: N/A	CTR Triggers for further vehicle analysis (for sections below) Guidelines: See Section 3.2.3 of the CTR guidelines to determine if a more comprehensive vehicle analysis is required. If so, completion of the remainder of the Roadway Network, Capacity & Operation section of the scoping form is required.	<u>Development Scenarios</u> Guidelines: See Section 3.2.4 of the CTR guidelines for discussion of the required development scenarios. Proposed Development Scenario: The study will evaluate the existing, future conditions without exchange, and indirect impacts of future conditions with exchange using redevelopment scenarios. The future horizon year is 2025.	Vehicle Study Area Guidelines: See Section 3.2.5 of the CTR guidelines for discussion of the study area. Proposed Study Area intersections, including access points (attach Figure at end of Scoping Form as needed): 4th Street NW to the east, 14 th Street NW to the west, H Street NW to the north, Constitution Avenue to the south – see Figure 1.	Data Collection and Hours of Analysis Guidelines: See Section 3.2.6 of the CTR guidelines for discussion of the required data collection and hours of analysis.	Proposed turning movement count intersections: Constitution Avenue @ 14 th Street NW, 12 th Street NW, 10 th Street NW, 9 th Street NW, 7 th Street NW, and 6 th Street NW (6 intersections) Pennsylvania Avenue @ 14 th Street NW, 13 th Street NW, 12 th Street NW, 11 th Street NW, 10 th Street NW, 6 th Street NW, 6 th Street NW, Constitution Avenue EB (11

intersections) D Street NW @ 9 th Street NW and 7 th Street NW (2 intersections) E Street NW @ 12 th Street NW, 11 th Street NW, 10 th Street NW, 9 th Street NW, 8 th Street NW, and 7 th Street NW	
F Street NW @ 10 th Street NW and 9 th Street NW (2 intersections) G Street NW@ 10 th Street NW and 9 th Street NW (2 intersections) H Street NW @ 10 th Street NW and 9 th Street NW (2 intersections)	
Project will use the Old Post Office Redevelopment traffic counts obtained on Thursday, April 26, 2012, (five intersections) plus the counts DDOT obtained July, 2013, at the H Street intersections as part of the Alternatives Analysis for Premium Transit from Union Station to Georgetown (2 intersections). The remaining 24 intersections will be counted this Spring. All counts will include vehicle, trucks, pedestrians, and bicycles.	
All counts will be obtained between 7AM – 10AM and 4PM – 7PM on a Tuesday, Wednesday, or Thursday on a week without a holiday when Congress and public schools are in session.	
Roadway Improvements Guidelines: The study will account for approved and funded roadway improvement projects within the study area that are expected to begin before the proposal's horizon year. See Section 3.2.7 of the CTR guidelines.	
Proposed roadway improvements: Will include all improvements provided by DDOT proposed by 2025.	
<u>Background Developments</u> Guidelines: The study will account for vehicle trips generated by developments in the study area that have an origin/destination within the study area. See Section 3.2.8 of the CTR guidelines.	
Proposed background development: Will include the remaining portion of CityCenter still under construction and the Old Post Office Redevelopment projects.	
<u>Background Growth</u> Guidelines: The study will account for annual growth or decrease in through traffic on minor and principal arterials that pass through the proposed study area. See Section 3.2.9 of the CTR guidelines.	
Proposed annual background growth: Will compare the 2010 and 2020 MWCOG models to determine a background growth rate by road segment by direction for the study area. GSA will provide the proposed background growth rates before analyzing the No Build condition.	

Guidelines: Trips generated by the site will be distributed throughout the study area network. See Section 3.2.10 of the CTR guidelines for information in trip distribution and assignment. Proposed site distribution and assignment (attach Figures, as needed, at end of Scoping Form): The existing FBI trips will be removed based on the FBI zip code database providing the actual distribution of existing trips. The new trips added by the redevelopment scenarios will use the MWCOG trip tables to determine trip distribution for all three proposed land uses. Figure 2 shows the current FBI distribution patterns, Figures 3 shows the MWCOG office distribution patterns, and Figure 4 shows the residential distribution patterns.	
Analysis Methodology Guidelines: Capacity analyses are typically performed using Highway Capacity Manual (HCM) methodologies or a similar industry recognized software. See Section 3.2.11 of the CTR guidelines.	
Proposed analysis methodology: The study will use the Synchro TM method for analyzing each intersection to be consistent since the Highway Capacity Manual (HCM) 2010 method cannot be used for signalized intersections where a hold, exclusive pedestrian, or other special phase is included that does not support the National Electrical Manufacturers Association (NEMA) ring and barrier standards. The Synchro TM method for unsignalized intersections follows the HCM 2000 standards. As part of the Synchro TM method, the 50 th and 95 th percentile queues will be reported.	
While it is not the intention to alter the existing yellow and all red phases, if the need arises to propose changes to the signal timings, DDOT guidelines on vehicular and pedestrian intervals will be followed.	
The Synchro files will accompany the transportation study submittal to DDOT.	
Vehicle Trip Mitigation Guidelines: Proposed mitigation of vehicle impacts, if needed, must not add significant delay to other travel modes. Standard non-urban mitigation often includes geometric re-design which may not fit DDOT's practice of balancing safety and capacity across multiple transportation modes. See Section 3.2.12 of the CTR guidelines.	
For Informational purposes only. Mitigation will be documented in the final CTR. No information is required in the scoping form.	
The study will only provide recommended mitigation for the redevelopment scenarios (build-out condition).	

3. Bicycle & Pedestrian Facilities	DDOT Comments/Action Items
CTR Triggers for bike and pedestrian mode share Guidelines: A CTR is required to include some level analysis of the bike and pedestrian network at a minimum, based on several potential factors. See Section 3.3.1 of the CTR guidelines to determine if a more comprehensive analysis is required. If so, complete the remainder of the Bicycle & Pedestrian Facilities section of this scoping form.	
CTR Bike and Pedestrian Study area Guidelines to determine bike and pedestrian study areas.	
Proposed bike and pedestrian study areas: The study will include a summary of the pedestrian and bicycle network for the same study area as the roadways. This will include identifying the existing ADA compliant versus non ADA compliant curbs at each intersection and identifying existing general sidewalk issues. Existing bicycle lanes will also be identified.	
Data Collection and Analysis of Bike Network and Facilities Guidelines: See Section 3.3.3 of the CTR guidelines for data collection requirements and analysis for bike and pedestrian modes.	
Proposed Bike network and facilities analysis: The study will prepare an existing condition bicycle map and describe the network. It is not anticipated that the redevelopment scenarios will impact the bicycle or pedestrian network, but the study will highlight those intersections immediately adjacent to the parcel that lack ADA compliance and any nearby gaps in the bicycle network.	
Mitigation for Bike network Guidelines: If deficiencies have been documented in the study area's pedestrian or bike facilities that would preclude the proposed mode split, then mitigation of these deficiencies is required. See Section 3.3.4 of the CTR guidelines for mitigation requirements of the bike network.	
For Informational purposes only. Mitigation will be documented in the final CTR. No information required in scoping form.	
4. Transit Service	DDOT Comments/Action Items
CTR Triggers for transit mode share Guidelines: A CTR is typically required to include some level analysis of the transit network, based on several potential factors. See Section 3.4.1 of the CTR guidelines to determine the minimum analysis requirements and if a more comprehensive transit analysis is required. If so, completion of the remainder of the Transit Service section of this scoping form is required. See Section 3.4.1 of the CTR guidelines	

CTR Transit study area Guidelines: If further analysis of the transit network is triggered, see Section 3.4.2 of the CTR guidelines for determining the requisite study area.	
Proposed transit study area: The study will provide a summary of the transit provided within the study area including Metro, Metrobus, and commuter bus.	
<u>Analysis of Transit Network</u> Guidelines: Analysis of the transit network will incorporate both a quantitative and qualitative review. See Section 3.4.3 of the CTR guidelines for further information.	
Proposed transit analysis: The study will evaluate the existing Metro stations, Metrobus, circulator, and commuter bus in terms of stop locations, peak hour headway, and peak hour use. Based on the number of future bus transit trips produced by the redevelopment scenarios, the study will evaluate if bus capacity will be an issue. Since a new north-south streetcar line is under study that would travel through the study area, this study will not evaluate that new streetcar line.	
<u>Transit Trip Mitigation</u> Guidelines: Proposed mitigation of transit impacts may be needed, given certain impacts to the network. See Section 3.4.4 of the CTR guidelines for more information.	
For Informational purposes only. Mitigation will be documented in the final CTR. No information is required in scoping form.	
5. Site Access and Loading	DDOT Comments/Action Items
Guidelines: At a minimum, the Applicant is required to show site access for vehicles, pedestrians and bicyclists. In addition, DDOT has additional policies for site access and loading as they relate to public space. See Section 3.5 of the CTR guidelines for additional information regarding these policies.	
Freight\Delivery The study will identify existing and proposed commercial vehicle access to the site. See Section 3.5.1 of the CTR guidelines.	
<i>Motorcoach</i> For developments that will generate significant tourist activity (hotels, museums, etc.) the study will discuss the site plan's accommodation of motorcoach access. See Section 3.5.2 of the CTR guidelines.	

types for intersections with high crash rates (rates over 1.0 per MEV). The study will include mitigation if the proposed redevelopment scenarios introduce or exacerbate the safety condition of all modes of travel.	
10. Streetscape/Public Realm	DDOT Comments/Action Items
Guidelines: DDOT expects new developments to rehabilitate streetscape infrastructure between the curb and property lines. The applicant must work closely with DDOT and OP to ensure that design of the public realm meets current standards. See Section 3.10 of the CTR guidelines for direction on streetscape rehabilitation.	
These guidelines are provided to inform that public realm design standards may alter an Applicant's intended use of public space.	

Information/Data Requests (List requested data from DDOT after each field below):

- District planning documents:
- Local planning documents, including small area plans:
- Information on programmed and/or funded roadway improvements in study area: Will need the list of Improvements within study area
 - Studies for background developments in study area:
- Signal Timings: Will need all 31 intersections listed in the study area
 - Crash Data: Will need all 31 intersections listed in study area

Proposed Schedule:

- DDOT comments on Scoping Document: 4/30/14
- Transportation Consultant/Applicant responses to comments: 5/2/14
 - Phase I Completion: N/A
- Phase II Completion: N/A
- Submission of Report to DDOT: 11/1/14
- Zoning Commission or BZA Hearing Date: N/A

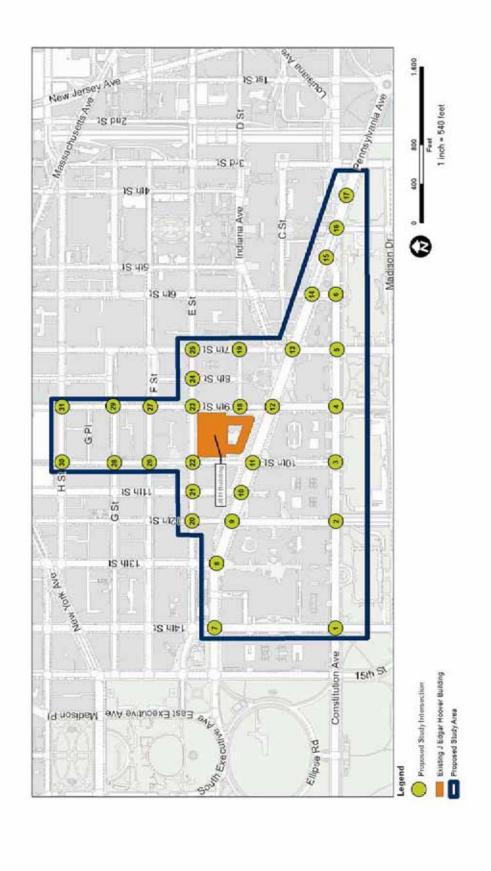


Figure 1: Proposed Transportation Study Area

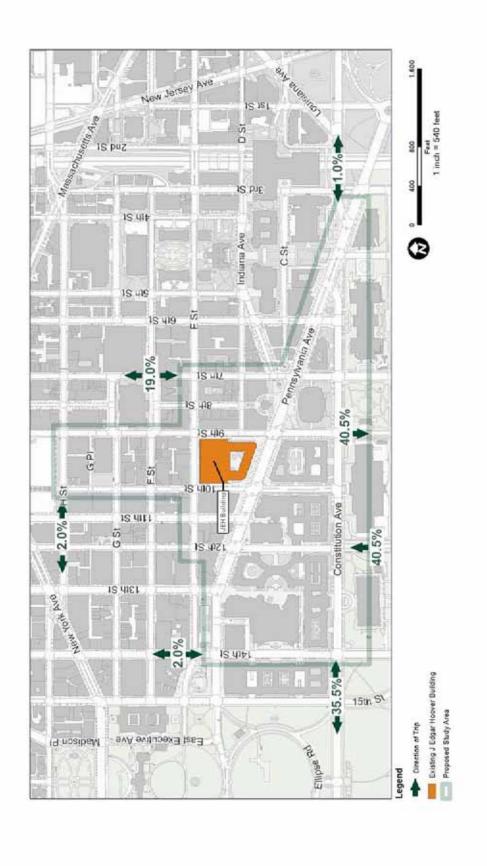


Figure 2: Proposed Trip Distribution for Existing FBI Trips

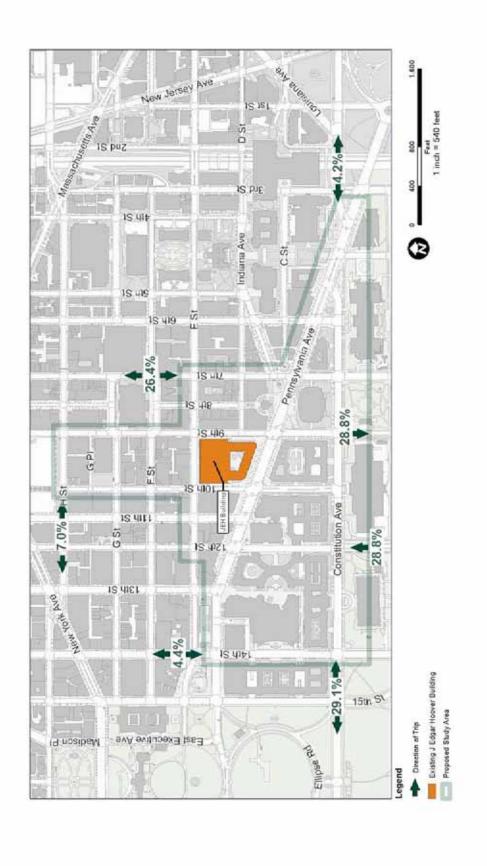


Figure 3: Proposed Trip Distribution for Future Office Trips

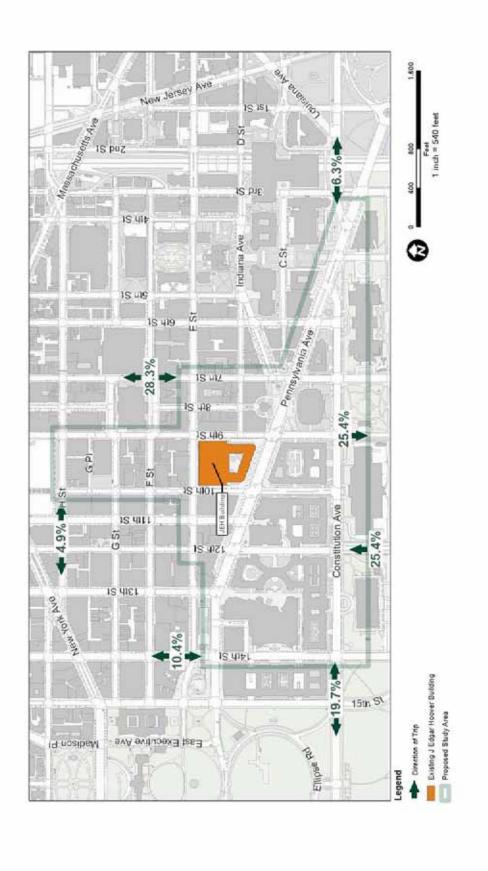


Figure 4: Proposed Trip Distribution for Future Residential Trips

FBI Headquarters Consolidation Project Proposed Methods for Modeling Transportation Impacts at Greenbelt Site (Greenbelt Site Transportation Agreement)

Trip Generation

Table C4-1: Future Site Trip Generation

Source	Independent Variable	Time Period	IN	OUT	TOTAL
IEH Cumrovo	11 OFF ampleyees	AM Peak Hour	2,982	224	3,206
JEH Surveys	11,055 employees	PM Peak Hour	149	2,825	2,974

Trip Generation Rates: 29.0% during AM and 26.90% during PM (maximum of three day survey) Peak hour entering/exiting percentages: AM – 93% / 7%, PM – 5% / 95%

Trip Distribution

Trip generation rates are shown in the table below and represent a blend between FBI zip code data and MWCOG trip tables.

Table C4-2: Future Site Trip Distribution

Roadways Serving Study Area	Percent Distribution	AM Peak Hour (vehicle trips)	PM Peak Hour (vehicle trips)
I-95/I-495 North of Site	38.0%	364	329
I-95/I-495 South of Site	40.0%	384	346
MD 201 North of Site	3.0%	29	26
MD 201 South of Site	2.0%	19	17
MD 193 East of Site	4.0%	38	35
MD 193 West of Site	5.0%	48	43
U.S. Route 1 North of Site	8.0%	77	69
TOTAL	100%	959	865

Study Area

The study area will comprise the 17 intersections as shown in the map on Figure C4-1.

An analysis of the Merge/Diverge/Weaves along I-95 / I-495 for the existing/proposed ramps that would serve proposed FBI vehicle trips would include the following locations:

- I-95 southbound to Greenbelt Station (diverge) AM only
- I-95 northbound to Greenbelt Station (weave) AM only
- Greenbelt Station to I-95 northbound (weave) PM only
- Greenbelt Station to I-95 southbound (weave) PM only

Figure C4-1: **Study Area Intersections** HANNA'ST UCKER'ST BEAVER DAM RD -MINE OLA-RD RIDGE RD IROQUOIS ST MESDEOF UNIVERSI TE CUMSEN ST QUEBECAL **Proposed Study Intersections and Distributions** 4,200 1,050 2,100 Proposed Site Feet Proposed Study Intersection

1 inch = 2,133 feet Sources: ESRI (2013), GSA (2013), DC GIS (2013)

Modal Split

Table C4-3: Modal Split for FBI Consolidation at Greenbelt Site

Mode	FBI Development Percent by Mode	FBI Number of Trips by Mode
Single-Occupancy Vehicles (SOV)	29.67	3,280
Carpool/ Vanpool	11%	405 trips (1,216 persons)
Bicycle	2%	221
Walk	1%	110
Commuter Bus	3%	11 trips (332 persons)
Local Bus	6%	663
Metrorail / Commuter Rail	47.33	5233
Telework / Compressed Work Schedules	0%	0
TOTAL	100%	11,055

^{*}Assumes an average of three passengers per carpool

Analysis Years

- Existing Condition 2014
- Comparable No-build 2022
- Build 2022

Analysis Methods

Synchro/SimTraffic - Intersections

Critical Lane Volume - Intersections

Highway Capacity Software - Highway Facilities

- If LOS D or better for Build Condition only, then no further study required.
- If LOS E or F and less than 5 percent increase in vehicle density when compared to Comparable No-build Condition, then no further study required.

TransModeler – AM peak hour inbound gate queue analysis

Background Growth

According to MWCOG model comparison between 2010 and 2025 models, there will be an average of 0.45 percent per year growth on I-95, a 0.6 percent per year growth on MD 201, a 0.5 percent per year growth on Cherrywood Lane, and a zero percent per year growth on MD 193.

According to the historic AADTs maintained by Maryland SHA, all non-interstates had negative trends.

GSA recommends 0.33 percent per year growth rate for all roadways.

Planned Developments

The following developments will be considered part of the Comparable No-build Condition:

- North Core
- South Core
- Capital Investment Park

Planned Roadway Improvements

The following planned roadway improvements will be considered part of the Comparable No-build Condition:

- New roadways as designed by developer covering the North Core development area
- New ramps between the North Core development and I-95 southbound
- New signalized intersection along MD 193 and South Core driveway
- Cherrywood Lane reduced to one lane in each direction between Metro Access Drive and MD 193

FBI Headquarters Consolidation Project Proposed Methods for Modeling Transportation Impacts at Landover Site (Landover Site Transportation Agreement)

Trip Generation

Table D4-1: Future Site Trip Generation

Source	Independent Variable	Time Period	IN	OUT	TOTAL
IEH Cumrovo	11 OFF ampleyees	AM Peak Hour	2,982	224	3,206
JEH Surveys	11,055 employees	PM Peak Hour	149	2,825	2,974

Trip Generation Rates: 29.0% during AM and 26.90% during PM (maximum of three day survey) Peak hour entering/exiting percentages: AM – 93% / 7%, PM – 5% / 95%

Trip Distribution

Trip generation rates are shown in the table below and represent a blend between FBI zip code data and MWCOG trip tables.

Table D4-2: Future Site Trip Distribution

Roadways Serving Study Area	Percent Distribution Inbound	Percent Distribution Outbound	AM Peak Hour (vehicle trips)	PM Peak Hour (vehicle trips)
I-95/I-495 NB North of Site	N/A	17.5%	N/A	304
I-95/I-495 SB North of Site	23.0%	N/A	443	N/A
I-95/I-495 South of Site	39.5%	39.5%	761	686
MD 704 NB North of Site	N/A	9.0%	N/A	156
MD 704 SB North of Site	3.5%	N/A	67	N/A
MD 202 West of Site	17.5%	17.5%	337	304
MD 202 East of Site	12.0%	12.0%	231	208
Lottsford Road East of Site	2.5%	2.5%	48	43
Sheriff Road West of Site	2.0%	2.0%	39	35
TOTAL	100.0%	100.0%	1,927	1,737

Study Area

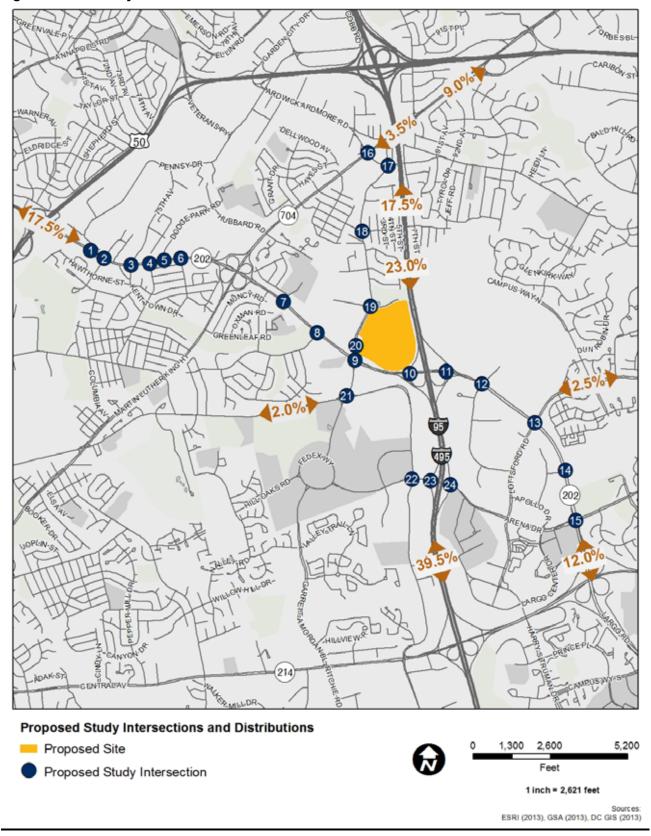
The study area will comprise the 24 intersections as shown in the Figure D4-1.

An analysis of the Merge/Diverge/Weaves along I-95 / I-495 for the existing ramps that would serve proposed FBI vehicle trips would include the following locations:

- I-95 southbound to MD 202 westbound (diverge) AM only
- I-95 northbound to MD 202 (weave) AM only

- MD 202 northbound to I-95 southbound (weave) PM only
- MD 202 eastbound to I-95 northbound (merge) PM only
- Arena Drive to I-95 southbound (weave) PM only

Figure D4-1: Study Area Intersections



Modal Split

Table D4-3: Modal Split for FBI Consolidation at Landover Site

Mode	FBI Development Percent by Mode	FBI Number of Trips by Mode
Single-Occupancy Vehicles (SOV)	63.3%	7,002
Carpool/ Vanpool *	10%	368 trips (1,105 persons)
Bicycle	1%	111
Walk	1%	111
Commuter Bus	3%	11 trips (332 persons)
Local Bus	3%	332
Metrorail/ Commuter Rail	18.7	2062
Telework/ Compressed Work Schedules	0%	0
TOTAL	100%	11,055

^{*}Assumes an average of three passengers per carpool.

Analysis Years

- Existing Condition 2014
- No-build 2022
- Build 2022

Analysis Methods

Synchro/SimTraffic - Intersections

Critical Lane Volume - Intersections

Highway Capacity Software - Highway Facilities

- If LOS D or better for Build Condition only, then no further study required.
- If LOS E or F and less than 5 percent increase in vehicle density when compared to No-build, then no further study required.

TransModeler - AM peak hour inbound gate queue analysis

Background Growth

According to MWCOG model comparison between 2010 and 2025 models, there will be an average of 0.56 percent per year growth on I-95, a 0.28 percent per year growth on MD 202, a 1.4 percent per year growth on Arena Drive, and a 2.77 percent per year growth on Brightseat Drive.

According to the historic AADTs maintained by Maryland SHA, MD 202 had a 0.5 percent growth while Arena Drive and Brightseat Road had negative trends.

GSA recommends 0.5 percent per year growth rate for I-95, a 0.33 percent per year growth rate for MD 202 and Brightseat Road, and a 1.0 percent per year growth rate for Arena Drive.

Planned Developments

The following developments will be considered part of the No-build Condition:

- Largo Park (Lots 3 and 4 Block D and Lot 5 Block B)
- Hunters Ridge
- King Property
- Balk Hill Village
- Woodmore Town Center
- Englewood Business Park (Lots 27, 31, 32, 35, 43, 51, and 52)
- Corporate Center (Lot 4)
- Brightseat Road Property

Planned Roadway Improvements

No planned roadway improvements will be considered part of the No-build Condition.

FBI Headquarters Consolidation Project Proposed Methods for Modeling Transportation Impacts at Springfield Site

Trip Generation

Future Site Trip Generation

Source	Independent Variable	Time Period	IN	OUT	TOTAL
JEH Surveys	11 OFF ampleyees	AM Peak Hour	2,982	224	3,206
	11,055 employees	PM Peak Hour	149	2,825	2,974

Trip Generation Rates: 29.0% during AM and 26.90% during PM (maximum of three day survey) Peak hour entering/exiting percentages: AM - 93%/7%, PM - 5%/95%

Trip Distribution

Trip generation rates are shown in the table below and represent a blend between FBI Zip code data and MWCOG trip tables.

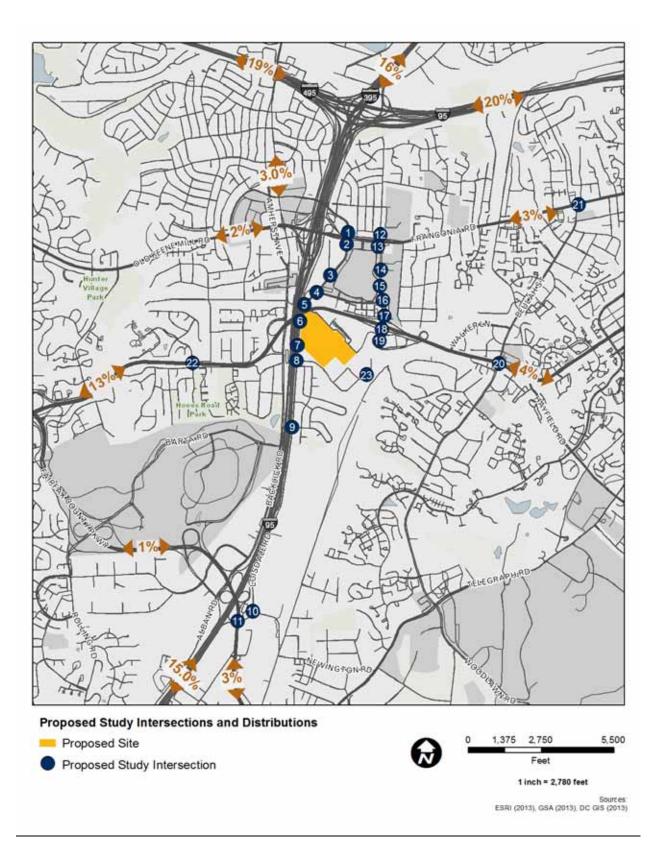
Roadways Serving Study Area	Percent Distribution	AM Peak Hour (vehicle trips)	PM Peak Hour (vehicle trips)
I-95/I-495 East of Site	20.0%	201	191
I-395 North of Site	16.0%	161	153
I-495 North of site	19.0%	191	181
I-95 South of Site	15.0%	151	143
Franconia Road East of Site	3.0%	30	29
Old Keene Mill Road West of Site	2.0%	20	19
Backlick Road North of Site	3.0%	30	29
Franconia-Springfield Parkway East of Site	4.0%	40	38
Franconia-Springfield Parkway West of Site	13.0%	131	124
Fairfax County Parkway East of Site	3.0%	30	29
Fairfax County Parkway West of Site	1.0%	10	10
Area Adjacent to site	1.0%	10	10
	100.0%	1,006	953

Study Area

The study area will comprise the 23 intersections as shown in the map on the next page.

An analysis of the Merge/Diverge/Weaves/Ramp Capacity along I-95 for the existing ramps that would serve proposed FBI vehicle trips would include the following locations:

- I-95 northbound to Loisdale Road/ Spring Mall Road (diverge) AM only
- I-95/I-395/I-495 southbound ramp to Franconia Road EB (ramp capacity comparison) AM only
- Fairfax County Parkway westbound to I-95 southbound (ramp capacity comparison unless a weave analysis applies) PM only
- Commerce Street intersection with on-ramp to I-495 northbound (intersection only) PM only Franconia Road on-ramp to I-495/I-395/I-95 northbound (ramp capacity comparison and merge analysis where applicable) PM only
- Fairfax County Parkway westbound between I-95 NB off-ramp and I-95 SB on-ramp (weave analysis) PM only



Modal Split

Mode	FBI Development Percent by Mode	FBI Number of trips by Mode
Single-Occupancy Vehicles (SOV)	30.58%	3,381
Carpool/ Vanpool *	11%	304 trips (1,216 persons)*
Bicycle	2%	221
Walk	3%	332
Commuter Bus	10%	37 trips (1,105 persons)
Local Bus	6%	663
Metrorail/ Commuter Rail	37.42%	4137
Telework/ Compressed Work Schedules	0%	0
Total	100%	11,055

^{*}Assumes an average of four passengers per carpool.

Analysis Years

- Existing Conditions 2014
- No Build 2022
- Build 2022

Analysis Methods

Synchro/SimTraffic – Intersections

Highway Capacity Software (version 6.65)—) — Highway Facilities

- If LOS D or better for Build condition only, then no further study required.
- If LOS E or F and less than 5 percent increase in vehicle density when compared to No Build, then no further study required.

Highway Capacity Manual (HCM)

Since the ramps from Franconia Road and Commerce Street connect to a complex system of other ramps before merging onto I-495, I-395, or I-95 northbound, a ramp capacity check is proposed to quickly ascertain if the added FBI volume will exceed the capacity. According to the 2010 HCM, Exhibit 13-10, in conjunction with Exhibits 13-8 and 13-9, on page 13-18 (shown below), ramp capacity is defined by the ramp free flow speed. To be conservative, the posted speed limit will be used to set the upper capacity limit.

Exhibit 13-8 Capacity of Ramp—Freeway Junctions (pc/h)

FFS		Freewa	tream/Do y Segmen in One Di		Max. Desirable Flow Rate (ν_{R12}) Entering Merge	Max. Desirable Flow Rate (ν ₁₂) Entering Diverge	
(mi/h)	2	3	4	>4	Influence Area ^b	Influence Areab	
≥70	4,800	7,200	9,600	2,400/ln	4,600	4,400	
65	4,700	7,050	9,400	2,350/In	4,600	4,400	
60	4,600	6,900	9,200	2,300/ln	4,600	4,400	
55	4,500	6,750	9,000	2,250/ln	4,600	4,400	

Notes: ^a Demand in excess of these capacities results in LOS F.

Exhibit 13-9
Capacity of High-Speed
Ramp Junctions on Multilane
Highways and C-D Roadways
(nc/h)

		Capacity ream/Dov vay or C-D		Max. Desirable	Max. Desirable Flow
FFS (mi/h)	_	o. of Lanes Direction	<u>on</u>	Flow Rate (V _{R12}) Entering Merge Influence Area ^b	Rate (V ₁₂) Entering Diverge Influence Area ^b
≥60	4,400	6,600	>3 2,200/ln	4,600	4,400
55	4,200	6,300	2,100/ln	4,600	4,400
50	4,000	6,000	2,000/ln	4,600	4,400
45	3,800	5,700	1,900/ln	4,600	4,400

Notes: ^a Demand in excess of these capacities results in LOS F.

Exhibit 13-10	
Capacity of Ramp	Roadways
(pc/h)	

Ramp FFS	Capacity of Ramp Roadway		
S_{FR} (mi/h)	Single-Lane Ramps	Two-Lane Ramps	
>50	2,200	4,400	
>40-50	2,100	4,200	
>30-40	2,000	4,000	
≥20-30	1,900	3,800	
<20	1,800	3,600	

Note: Capacity of a ramp roadway does not ensure an equal capacity at its freeway or other high-speed junction.

Junction capacity must be checked against criteria in Exhibit 13-8 and Exhibit 13-9.

If ramp capacity comparison is less than HCM 2010 rate, then no further study required.

TransModeler – AM peak hour inbound gate queue analysis

Background Growth

According to MWCOG model comparison between 2010 and 2025 models, there will be an average of 0.9 percent per growth on I-95 and a 1.83 percent per year growth on arterials (Loisdale Road, Frontier Drive, and Franconia Road). A good portion of that growth is probably due to the Springfield Town Center and office buildings along Loisdale Road.

According to the historic AADTs maintained by VDOT, all non-interstates had negative trends.

GSA recommends 0.58 percent per year growth rate for non-interstate facilities and 0.75 percent per year growth rate for I-95.

Planned Developments

The following developments will be considered part of the No Action:

• Safford Automobile Dealership

 $[^]b$ Demand in excess of these values alone does not result in LOS F; operations may be worse than predicted by this methodology.

 $^{^{\}it b}$ Demand in excess of these values alone does not result in LOS F; operations may be worse than predicted by this methodology.

 Springfield Metro Center II Phases I and II (57% of projected driveway volumes from Frontier Drive Extension only reflecting percentage of trips included in MWCOG 2025 travel demand model

Planned Roadway Improvements

The following planned roadway improvements will be considered part of the No Action:

- Frontier Drive Extension between Springfield Metro Station and Loisdale Road via Springfield Center Drive
- Install a new traffic signal at the intersection of Frontier Drive Extension and Loisdale Road
- Install a new traffic signal at the intersection of Metropolitan Center Drive and Loisdale Road
- Upgrade the ramps between the Springfield Metro Station and Franconia-Springfield Parkway resulting in a change in traffic patterns entering and existing the Metro station
- Change in background travel patterns caused by Frontier Drive extension
- Improvements to Loisdale Road between Fairfax County Parkway (VA 286):
 - 1. Add second SB Left from VA 286 to Loisdale Road
 - 2. Add second WB left from Loisdale Road to VA 286
 - 3. Add exclusive NB right turn lane on VA 286 at Loisdale Road
- Springfield Town Center Proffers:
 - 1. Remove the island channelizing the southbound right-turn movement from Frontier Drive onto westbound Franconia-Springfield Parkway, to create dual right turn lanes
 - 2. Construct dual left turn lanes from northbound Frontier Drive onto westbound Spring Mall Road, including a pedestrian refuge in the Frontier Drive median of at least four feet (4') in width
 - 3. Widen Franconia Road to accommodate a third (3rd) eastbound through lane from approximately 750 feet west of Loisdale Road, or the maximum extent possible as determined by FCDOT, to Village Drive
 - 4. Widen northbound Loisdale Road to accommodate a third (3rd) through lane from Spring Mall Road to Lois Lane.
 - 5. Widen northbound Loisdale Road to accommodate a second (2nd) northbound through lane from Lois Lane through the intersection with Franconia Road.
 - 6. Construct a second (2nd) left turn lane from southbound Loisdale Road onto eastbound South Street;
 - 7. Widen southbound Loisdale Road between Franconia Road and South Street to three (3) through lanes and dual left turn bays onto eastbound South Street.
 - 8. Widen southbound Loisdale Road between South Street and Spring Mall Road to two (2) through lanes, one (1) full-length left turn lane and one (1) left turn bay onto eastbound Spring Mall Road.
 - 9. Reconstruct and extend the right turn bay from the eastbound I-95 off-ramp to southbound Loisdale Road and modify the intersection to accommodate two (2)

through lanes onto Spring Mall Road and two (2) dedicated left turn lanes onto northbound Loisdale Road, in addition to the right turn bay;

Signal Warrant Analysis

If the site driveways require a traffic signal to handle the demand in traffic turning into or out of the site, a signal warrant analysis will be conducted following the 2009 Manual on Uniform Traffic Control Devices (MUTCD) and Virginia Supplement to the 2009 MUTCD. For the DEIS a preliminary warrant analysis will be conducted.



Denise Decker - WPT-C <denise.decker@gsa.gov>

FBI Consolidation EIS Springfield Site Agreement

Burke, Thomas W. <Thomas.Burke@fairfaxcounty.gov>

Mon, Feb 2, 2015 at 4:45 PM

To: "Berger, Mark" <mberger@louisberger.com>

Cc: "paul.kraucunas@vdot.virginia.gov" <paul.kraucunas@vdot.virginia.gov>, "Denise Decker (denise.decker@gsa.gov)" <denise.decker@gsa.gov>, Nia Francis - WPDB <nia.francis@gsa.gov>, Mack Gaither - WPTB-C <mack.gaither@gsa.gov>, "Canan, Timothy" <tcanan@louisberger.com>, "Zurawski, Carol A" <czurawski@louisberger.com>, "Anolik, Allison" <aanolik@louisberger.com>

Mark,

Your methodology document, transmitted on Thursday, January 29, 2015, looks good. I have reviewed your list of improvements and pipeline developments and they are consistent with what we have discussed.

Note that PB has stated they will assemble the model files (including OD tables) we discussed late last week that will hopefully shed some light on the diversion question. I will transmit to you as soon as I get them.

Thanks,

-Tom

THOMAS W. BURKE, P.E., AICP

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From: Berger, Mark [mailto:mberger@louisberger.com]

Sent: Thursday, January 29, 2015 4:12 PM

To: Burke, Thomas W.

Cc: paul.kraucunas@vdot.virginia.gov; Denise Decker (denise.decker@gsa.gov); Nia Francis - WPDB; Mack

Gaither - WPTB-C; Canan, Timothy; Zurawski, Carol A; Anolik, Allison

Subject: FBI Consolidation EIS Springfield Site Agreement

[Quoted text hidden]

FBI HQ Relocation DEIS – Local Bus Operations Analysis Methodology

This memo details the methodology that will be used to analyze the impacts of the FBI HQ relocation on local bus operations.

In this analysis, three different conditions will be assessed and compared to determine potential impacts of the FBI HQ relocation. These conditions are:

- 1. Existing Conditions evaluating the current facilities surrounding each location based on existing route and stop level ridership;
- 2. No Build (2022) evaluating current facilities surrounding each location based on projected route and stop level ridership;
- 3. Build (2022) evaluating current facilities surrounding each location based on projected route and stop level ridership combined with demand projections from the Proposed FBI Consolidation EIS Transportation Assumptions report.

RIDERSHIP PROJECTIONS

Existing Conditions

Ridership projections will be developed for each of the conditions mentioned above for each route and direction within the study area, defined as ½ mile around each proposed site. For Existing Conditions, ridership will be based on October 2014 average maximum passenger load data by route, direction, and stop for WMATA routes, and any available ridership data for other agencies (Fairfax Connector, TheBus, and the Central Maryland RTA). The maximum weekday passenger loads for each route and direction at stops within the study area will be averaged by stop, and then this figure will be multiplied by the number of peak trips per hour to calculate ridership per peak hour by route and direction (see Table 1). These totals will then be summed by site in order to calculate a total ridership per peak hour for each site study area. This total ridership per peak hour figure will be the basis for all future calculations.

Table 1: Study Area Ridership Calculation Example for Metrobus Route 39 East

Route/ Direction	Stops Within Study Area	Weekday Maximum Passenger Load	Peak Trips Per Hour	Peak Hour Volume through Study Area
39 East	PENNSYLVANIA AVE NW/13TH ST NW	28	-	-
39 East	PENNSYLVANIA AVE NW/7TH ST NW	32	-	-
	Average	30	3	90

No Build (2022) Conditions

For the No Build (2022) Conditions, ridership will be projected using the MWCOG 2014 Constrained Long-Range Plan (CLRP) bus ridership projections. These projections will be used to estimate an average compound annual growth rate (CAGR) for regional bus ridership from 2015 to 2030. This CAGR will then be applied to the total peak hour existing ridership for each site study area to calculate 2022 total peak hour ridership for each site study area. The 2022 total peak hour ridership per study area will be used for analysis because ridership projections do not exist at



the route level, and it is unknown which routes would be used by patrons of each site. Bus operations, including levels of service, stop locations and bus bay assignments (if applicable) in 2022 are assumed to be the same as 2014.

Build (2022) Conditions

For the Build (2022) Conditions, the projected peak hour ridership for each site study area determined in the No Build (2022) Scenario will incorporate the additional trips calculated in the Proposed FBI Consolidation EIS Transportation Assumptions for the bus access mode to each site. **Table 2** details these calculations.

Table 2: Existing & Future Ridership Projection Calculations

#	Data	Formula	Source
1	Average Maximum Passenger Load in Study Area (each route & direction)	-	WMATA, Other agencies
2	Peak Hour Trips in Study Area (each route & direction)	-	WMATA, Other agencies
3	Base Year Peak Hour Ridership (each route & direction)	= #1 x #2	-
4	Base Year Total Peak Hour Ridership by Site	= Σ (#3)	-
5	2015-2030 Compound Annual Growth Rate (CAGR)	$= \left(\frac{2030 Ridership}{2015 Ridership}\right)^{\frac{1}{15}} - 1$	MWCOG CLRP Transit Projections
6	No Build (2022) Total Peak Hour Ridership by Site	$= #4 \times (1 + #5)^8$	-
7	Build (2022) Total Peak Hour Ridership by Site	= #6 + FBI EIS Transportation Assumptions	-

LOCAL BUS CAPACITY ANALYSIS

Existing Conditions

In this section data will be summarized to determine whether there is sufficient capacity for existing ridership. Existing capacity for each site study area will be calculated by multiplying the passenger load standard for each route and direction by the number of peak hour trips for each route and direction (see Table 3). The existing peak hour ridership for each site will then be compared to this capacity to identify if additional service is needed.

Table 3: Existing Conditions Capacity Analysis

#	Data	Formula	Source
8	Passenger Load Standards	= 1.2 (radial) = 1.1 (crosstown) X number of seats per bus (39 or 60) = 1.0 (express)	WMATA Service Standards
9	Existing Peak Hour Capacity (each route & direction)	= #8 x #2	-



#	Data	Formula	Source
10	Existing Peak Hour Capacity by Site	$=\Sigma \text{ (#9)}$	-
11	Existing Peak Hour v/c	= #3 / #10	-

Future Conditions

The No Build (2022) and Build (2022) conditions will be assessed to estimate future conditions.

Analysis of Future No Build Conditions under Future Operations (2022)

Future No Build capacity for each site study area will be the same as existing capacity (see Table 4). No changes to level of service, span, or vehicle type are assumed unless provided by WMATA based programmed improvements because this level of detail cannot be accurately ascertained for 2022. The Future No Build peak hour ridership for each site will then be compared to this capacity to identify if additional service is needed. Additional service, in the form of bus trips, will be calculated by dividing the difference in peak hour ridership and peak hour capacity by WMATA's load standards. The additional bus trips needed will not be disaggregated to the route level due to the fact that it is unknown which routes would be used by patrons of each site.

Table 4: Future No Build Conditions Capacity Analysis

#	Data	Formula	Source
12	Future Peak Hour Capacity (each route & direction)	= #9	-
13	Future Peak Hour Capacity by Site	= #10	-
14	Future No Build Peak Hour v/c	= #6 / #13	-
15	Additional Bus Trips Needed	= (#6 - #13) / #8	-

Analysis of Future Build Conditions under Future Operations (2022)

Future Build capacity for each site study area will be the same as existing capacity (see Table 5). The Future Build peak hour ridership for each site will then be compared to this capacity to identify if additional service is needed. Additional service, in the form of bus trips, will be calculated by dividing the difference in peak hour ridership and peak hour capacity by WMATA's load standards.

Table 5: Future Build Conditions Capacity Analysis

#	Data	Formula	Source
12	Future Peak Hour Capacity (each route & direction)	= #9	-



#	Data	Formula	Source
13	Future Peak Hour Capacity by Site	= #10	-
14	Future Build Peak Hour v/c	= #7 / #13	-
15	Additional Bus Trips Needed	= (#7 - #13) / #8	-

Recommendations will be made on the Build condition to mitigate impacts, if any, to the route and stops to ensure future projected ridership is being accommodated with an appropriate number of buses and supporting infrastructure. The number of additional bus trips needed will be used to estimate additional capacity needs at Metrorail Station bus loops and bus stops directly serving each site. The operating needs associated with the additional bus trips needed will also be estimated, using standard operating costs provided by WMATA and/or the other agencies.

METRORAIL STATION BUS LOOP IMPACTS

Existing Conditions

Bus loops at each Metrorail Station in each site study area will be evaluated to determine if sufficient capacity exists for existing bus services. Capacities will be based on a standard of six buses per bus bay per hour, according to WMATA's Station Site and Access Planning Manual.

Future Conditions

The Build (2022) conditions will be assessed to estimate future demand at Metrorail Station bus loops. No Build conditions will not be assessed, as no changes to existing bus level of service will be assumed. No changes to level of service, span, or vehicle type are assumed unless provided by WMATA based programmed improvements because this level of detail cannot be accurately ascertained for 2022.

Analysis of Future Build Conditions under Future Operations (2022)

The need for additional bus bays or restructuring of services at Metrorail stations will be assessed based on mitigation recommendations (i.e. additional trips) and proposed shuttle services that will operate between Metrorail stations and the proposed sites. The analysis will include the following:

- Bus bay capacity, with any new service and shuttle service included,
- Optimization of bus bay assignment, based on site circulation (operational efficiencies), segregation by agency, and trips per peak hour, and
- Access to the bus loop.



Metrorail Station Analysis

This report will detail the methodology used to perform ridership projections and station capacity analyses for the Archives, Federal Triangle, Metro Center, Gallery Place-Chinatown, Greenbelt, Largo Town Center, and Franconia-Springfield Metrorail Stations.

In this analysis, three different conditions will be assessed and compared to determine potential impacts of siting the proposed FBI facilities in proximity to the Metrorail stations being studied. These conditions are:

- 1. Existing Conditions evaluating the current facilities at each station based on existing demand;
- 2. No Build (2022) evaluating current facilities at each station assuming demand as projected in the 2008 Metrorail Station Access and Capacity Study for 2022;
- Build (2022) evaluating current facilities at each station assuming demand as projected in the 2008
 Metrorail Station Access and Capacity Study for 2022 combined with demand projections from the
 Proposed FBI Consolidation EIS Transportation Assumptions report.

A full station capacity analysis will be performed at stations with a single entrance, including Archives, Federal Triangle, Greenbelt, Franconia-Springfield, and Largo Town Center. At Gallery Place-Chinatown and Metro Center, only the two closest station entrances at each station will be analyzed, as these entrances are most likely to be used by patrons of the JEH site.

RIDERSHIP PROJECTIONS

Ridership projections will be developed for each of the conditions mentioned above. For Existing Conditions, ridership will be based on October 2014 station faregate peak entry and exit totals in 15-minute increments (provided by WMATA). At Gallery Place-Chinatown and Metro Center, transfers between Metrorail lines will be estimated from the *Gallery Place-Chinatown Station Capacity Improvement Plan*. For the No Build (2022) Conditions, ridership will be projected using the *MWCOG 2014 Constrained Long-Range Plan* (CLRP) transit ridership projections. These projections will be used to estimate an average compound annual growth rate for each station from 2008 to 2025. This annual growth rate will then be used to determine the projected ridership in 2022 by station. For the Build (2022) Conditions, the projected ridership determined in the No Build (2022) Scenario will incorporate the additional trips calculated in the Proposed FBI Consolidation EIS Transportation Assumptions for each station. **Table 1** details these calculations.

Table 1: Future Ridership Projection Calculations

#	Data	Formula	Source
1	2008-2025 Compound	$(2025 Ridership)^{\frac{1}{17}}$	MWCOG 2014
	Annual Growth Rate (CAGR)	$= \left(\frac{2028 Ridership}{2008 Ridership}\right)^{-1} - 1$	Constrained Long- Range Plan (CLRP)
2	No Build (2022) Ridership	$= 2014 Ridership \times (1 + #1)^8$	WMATA Faregate Data
3	Build (2022) Ridership	= #2 + FBI EIS Transportation Assumptions	Calculated



OPERATING CONDITIONS

Existing Operations

Existing Metrorail operations will be assessed using field observations and data provided through WMATA. The following information will be collected:

- Peak headways of trains;
- Number of cars per train;
- Any other pertinent information about the stations.

Based on the number of trains per hour (determined by the peak headway) and the number of passengers each train car is able to transport the capacity of services on a per hour basis will be determined.

Future Operations

Details on planned future improvements to Metrorail service by 2022 at these three stations will be collected from WMATA and include:

- Changes to peak headways;
- Changes to number of cars per train;
- Any other pertinent information about planned improvements to the stations such as platforms, escalators, and ingress/egress points, etc.

The estimated change in capacity, as compared to the existing conditions, will be re-estimated if there are any changes in peak headways or sizes of train cars.

VERTICAL CIRCULATION CAPACITY ANALYSIS

Existing Demand

In this section, observations will be summarized to determine whether there is sufficient capacity for existing demand. Vertical elements will be analyzed under normal operations at all levels of the station, including street-to-mezzanine and mezzanine-to-platform, where applicable. This analysis will include applying industry standards to the vertical elements available in each station to determine peak capacity.

It will be determined whether each station's staircases and escalators (main means to ingress/egress) have an acceptable volume-to-capacity (V/C) ratio to meet existing demand. The station layout will be an important consideration in this analysis, particularly the orientation of the escalators and staircases, and whether the platform is above or below the mezzanine.

The escalator analysis will be performed on escalators at each station level. Escalator volume-to-capacity (v/c) ratios will be calculated based on total ridership (entries and exits) during the peak 15-minute exiting period at each station and/or entrance (see example in **Table 2**).

A staircase analysis will be performed if a staircase exists at the station. Staircase volume to capacity (v/c) ratios will be determined by calculating the number of people per foot per minute who need to use staircases compared to the overall staircase capacity (see example in **Table 2**). The primary direction of travel for staircases that are adjacent to escalators will be assumed to always be in the opposite direction. In this situation, it is assumed that 10% of passengers traveling in the same direction as the escalator will use the staircase.



Table 2: Escalator & Stair Capacity Analysis Example

#	Assumption	Value/Notes	Source/Formula
1	Peak 15-Minute Period	Varies	WMATA Faregate Data
2	Peaking Factor	1.28	WMATA
3	Escalator Passengers/Minute	90	TCQSM
4	Stairs Passengers/Foot/Minute	10	TCQSM LOS D
5	% Entries Using Escalator	Dependent on presence of stairs	= 1 - #9 - #7
6	% Exits Using Escalator	Dependent on presence of stairs	= 1 - #10 - #8
7	% Entries Using Elevator	5% (if present)	WMATA
8	% Exits Using Elevator	5% (if present)	WMATA
9	% Entries Using Stairs	If present, 10% if escalator operating in same direction	TCQSM, Station layout
10	% Exits Using Stairs	If present, 10% if escalator operating in same direction	TCQSM, Station layout
Ride	rship		
11	15-Minute Entries	Х	WMATA Faregate Data
12	15-Minute Exits	X	WMATA Faregate Data
13	Adjusted 15-Minute Entries	Х	= #11 x #2
14	Adjusted 15-Minute Exits	X	= #12 x #2
Esca	lators		
15	Adjusted Entry Escalator Volume	X	= #13 x #5
16	Adjusted Exit Escalator Volume	X	= #14 x #6
17	Entry Escalators	Dependent on direction	Site Visit
18	Exit Escalators	Dependent on direction	Site Visit
19	Entry Escalator Capacity (15-Minute)	X	= #17 x #3 x 15
20	Exit Escalator Capacity (15-Minute)	Х	= #18 x #3 x 15
21	Entry Escalator V/C	x.xx	= #15 / #19
22	Exit Escalator V/C	х.хх	= #16 / #20
	rs (If Present)		
23	Adjusted Entry Stair Volumes	X	= #13 x #9
24	Adjusted Exit Stair Volumes	X	= #14 x #10
25	Stairs	X	Site Visit
26	Stair Width (Feet)	X	WMATA Station Plans
27	Stair Capacity (15-Minute)*	X	= #25 x #26 x #4 x 15 x 0.9
28	Stair V/C	X.XX	= (#23 + #24) / #27

^{*}A friction factor of 0.9 is used on stairs to adjust for friction between passengers traveling in opposite directions.



If v/c ratios indicate congestion on vertical elements (v/c >= 0.7), queues will be calculated and recommendations will be made for the appropriate number and size of additional vertical elements at each station. Additionally, on stairs, if v/c ratios indicate congestion, then the actual stair flow rate (passengers per foot per minute) will be calculated.

Future Demand

The No Build (2022) and Build (2022) conditions will be assessed at the study area stations to estimate future v/c ratios.

Analysis of Future No Build Conditions under Future Operations (2022)

Vertical circulation will be assessed based on the No Build condition under future operations at each station, utilizing the projected 2022 ridership and capacity based on future conditions. As detailed above, the following analysis will be conducted:

- Peak capacity will be established based on existing configuration;
- Each station's staircase and escalator v/c ratio will be determined based on the projected ridership at the station in 2022.

If v/c ratios indicate congestion on vertical elements ($v/c \ge 0.7$), queues will be calculated and recommendations will be made for the appropriate number and size of additional vertical elements at each station.

Analysis of Future Build Conditions under Future Operations (2022)

Future vertical circulation will be assessed based on the Build condition under future operations at each station. Projected 2022 ridership will be calibrated to include expected ridership to be generated by the new FBI headquarters. As detailed above, the following analysis will be conducted:

- Peak capacity will be established based on existing configuration;
- Each station's staircase and escalator v/c ratio will be determined based on the projected ridership at the station in 2022, including the additional ridership generated by the FBI headquarters.

If v/c ratios indicate congestion on vertical elements (v/c >= 0.7), queues will be calculated and recommendations will be made for the appropriate number and size of additional vertical elements at each station.

FAREGATE CAPACITY ANALYSIS

Observations will be conducted to inventory the type and number of faregates at the entrance for each station. These observations will be used, in conjunction with WMATA Faregate Data by Station (peak 15-minute entries and exits for the 15-minute period with the highest number of exiting passengers), to assess faregate capacity for the existing, no build (2022) and build (2022) conditions, similar to the vertical element analysis.

Table 3 is an example of what will be used or calculated to conduct the faregate capacity analysis for all three conditions. A peaking factor of 1.28 and a fare aisle passenger flow rate of 35 people per minute will be used in these calculations.



Table 3: Faregate Capacity Analysis Example

#	Assumptions:	Amount/Notes	Source/Formula
1	Peak 15-Minute Period	Varies	WMATA
2	Peaking Factor	1.28	WMATA
3	Faregate Passengers/Minute	35	WMATA
4	Capacity V/C	0.7	LOS D
Ridersh	nip:		
5	Entries	Х	WMATA Faregate Data
6	Exits	Х	WMATA Faregate Data
7	Adjusted Entries	Х	= #5 x #2
8	Adjusted Exits	Х	= #6 x #2
9	Total Adjusted Volume	Х	= #7 + #8
Current	Fare Infrastructure:		
10	Regular Aisles	Х	Site Visit
11	ADA Aisles	Х	Site Visit
12	Total Aisles	Х	Site Visit
13	Current 15-Minute Capacity	Х	= #10 x #3 x 15
14	Current Faregate Aisle V/C	х.хх	= #8 / #12

The current, future no-build, and future build faregate v/c ratios will be calculated. If v/c ratios indicate congestion at faregate aisles ($v/c \ge 0.7$), queues will be calculated and recommendations will be made for the appropriate number of additional faregate aisles at each station.

FARE VENDING MACHINE CAPACITY ANALYSIS

Observations will be conducted to inventory the type and number of fare vending machines at the entrance for each station. These observations will be used, in conjunction with WMATA Faregate Data by Station (peak 15-minute entries and exits for the 15-minute period with the highest number of exiting passengers), to assess fare vending machine capacity for the existing, no build (2022) and build (2022) conditions, similar to the vertical element analysis.

Table 5 is an example of what will be used or calculated to conduct the fare vending machine capacity analysis for all three conditions. Fare vending machine transaction rates per minute, the proportion of passengers who use fare vending machines, and a peaking factor of 1.28 will all be used in these calculations. Transaction rates and passengers using fare vending machines will vary based on station location and the types of passengers that typically use each station. For example, commuter-oriented stations (Greenbelt, Largo Town Center, and Franconia-Springfield) will typically have fewer passengers using fare vending machines, and at a higher rate since most passengers use the system frequently. At downtown stations (particularly Gallery Place and Metro Center), a higher amount of tourists and infrequent passengers will use each station, and thus more passengers will likely use fare vending machines and use them at a slower rate.



Table 4: Fare Vending Machine Capacity Analysis Example

#	Assumptions:	Amount/Notes	Source/Formula
1	Peak 15-Minute Period	Varies	WMATA
2	Peaking Factor	1.28	WMATA
3	% Passengers Using Fare Vendors	4% - 20%*	WMATA
4	Fare Vendors People Per Minute	1.5 - 1.67*	WMATA
Riders	ship:		
5	Entries	Х	WMATA
6	Exits	X	WMATA
7	Adjusted Entries	Х	= #5 x #2
8	Adjusted Exits	Х	= #6 x #2
9	Adjusted Total	Х	= #7 + #8
Fare V	endors:		
10	Adjusted Fare Vendor Volume	Х	= #9 x #3
11	Fare Vendors	Х	Site Visit
12	Fare Vendor Capacity (15-Minute)	Х	= #11 x #4 x 15
13	Fare Vendor V/C	x.xx	= #10 / #12

^{*}Dependent on station location and types of passengers that typically use the station (i.e. regular commuters versus casual users or tourists).

The current, future no-build, and future build fare vending machine v/c ratios will be calculated. If v/c ratios indicate congestion at fare vending machines ($v/c \ge 0.7$), recommendations will be made for the appropriate number of additional fare vending machines at each station.

PLATFORM AREA ANALYSIS

The net platform areas for each station platform will be calculated using station engineering design plans provided by WMATA. The net platform area will exclude all elements on the platform (including benches, vertical elements, pylons, advertisements, etc), the platform edges, and the platform detectable warning panels. These calculations will be used, in conjunction with WMATA Faregate Data by Station, to assess platform areas for the existing, no build (2022) and build (2022) conditions, similar to the vertical element analysis.

The peak number of passengers entering and exiting trains will calculated and compared to the net platform area. The peak 15-minute entry period will be used to account for the highest number of passengers waiting on the platform at a given time. The number of trains serving the platform per direction during this 15-minute period will be used to calculate entries per train and exits per train. This makes calculations accurate for both side platforms and middle platforms. For middle platforms, this assumes two trains serve each track simultaneously, and represents a worst-case scenario. To adjust ridership for schedule irregularities and uneven distributions of passengers per train, a missed headway factor of two and a peaking factor of 1.28 will be used. The peaking

¹ A missed headway factor adjusts waiting passenger volume per train for service disruptions when a trip is missed, and therefore the headway is doubled.



factor will be applied to entries per train and exits per train, while the missed headway factor will be applied only to entries per train.

Since passengers tend to congregate near vertical elements (stairs and escalators), and therefore, to account for uneven passenger distribution along the platform, net platform areas will be split into three 200-foot long sections. Each platform section will be assigned a different weight, 50%, 35% and 15%, to reflect the percentage of passengers waiting in the respective area and exiting trains in the respective area. Adjusted entries and exits will be multiplied by each platform area's respective weight to determine how many passengers would enter and exit per train in each section. If queues are calculated at any vertical elements, then the area of platform occupied by the queue will also be subtracted from the net platform area.

Table 5 is an example of what will be used or calculated to conduct the platform capacity analysis for all three conditions.

Table 5: Platform Area Analysis Example

#	Assumption	Amount	Description	Source/Formula
1	Peak 15-Minute Entries	varies	Passengers	WMATA Faregate Data
2	Peak 15-Minute Exits	varies	Passengers	WMATA Faregate Data
3	Peak Headway	х	Minutes	WMATA
4	Trains per 15 Minutes per Direction	х	Trains	= 15 / #3
5	Entries per Train	Х	Passengers	= #1 / #4
6	Exits per Train	х	Passengers	= #2 / #4
7	Missed Headway Factor	2	-	WMATA
8	Peaking Factor	1.28	-	WMATA
9	Adjusted Entries per Train	х	Passengers	= #5 x #7 x #8
10	Adjusted Exits per Train	х	Passengers	= #6 x #8
11	Spacing per Person (LOS B)	10	ft²/p	WMATA, TCQSM LOS B
12	Net Platform Space Available	Varies	ft²	Site Visit & Station Plans

#	Assumption	Area 1	Area 2	Area 3	Formula
13	Area (ft²)	x	х	х	= #12 / 3
14	Waiting Passengers Per Train	х	х	х	Area 1 = #9 x .50
					Area 2 = #9 x .35
					Area 3 = #9 x .15
15	Waiting Passenger Area (ft ²)	х	х	х	= #14 x #11
16	Waiting Passenger Queue (ft)	х	х	х	= #15 / 200 (based on total
					platform length of 600',
					divided into 3 section)
17	Exiting Passengers Per Train	х	х	х	Area 1 = #10 x .50
					Area 2 = #10 x .35
					Area 3 = #10 x .15
18	Exiting Passenger Area (ft ²)	х	х	х	= #17 x #11



19 Net Area Remaining (11-)	19	Net Area Remaining (ft ²)	х	Х	х	= #13 - #15 – #18
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The current, future no-build, and future build waiting passenger queue widths and area of unoccupied space will be calculated. Pedestrian levels of service will be calculated for any platforms in which any platform areas (the most have no unoccupied space at LOS B (0 or negative values for #19). Additionally, waiting passenger queues (#16) will be compared to the usable platform width (total width minus platform edge and detectable warning panels).

ANALYSIS OF EXISTING CIRCULATION UNDER EMERGENCY OPERATIONS

Exit requirements under emergency conditions are based on the National Fire Protection Association Code 130. While WMATA is exempt from NFPA requirements (as the system was constructed prior to their adoption), a NFPA 130 analysis will be conducted to compare evacuation times to these requirements. The main requirements are:

- All passengers within the station (including those on board trains serving a platform) clear the platform in less than 4 minutes;
- All passengers reach an "area of safety" within 6 minutes;
- Passengers move more quickly on stairs than under normal operating conditions, increasing the capacity from 10 PFM (feet-per-minute) to approximately 19 PFM;
- One of the escalators must be assumed to be out of service, and the capacity of the remaining escalators is assumed to be the same as a stair;
- Escalators cannot make up more than 50% of the exit capacity.

Based on these requirements each station will be evaluated under existing, future no-build, and future build conditions. Platform evacuation times and station evacuation times (to a point of safety) will be reported. The evacuation times will be based on a number of assumptions provided by NFPA, and WMATA Faregate Data by Station (peak 15-minute entries and exits for the 15-minute period with the highest number of exiting passengers) for Greenbelt, Franconia-Springfield, and Largo Town Center. For Archives, Federal Triangle, Gallery Place-Chinatown, and Metro Center, it will be assumed that each track is being occupied by at-capacity 8-car trains (120 passengers per car, or 960 total passengers per train). Similar to the platform analysis, a missed headway factor and peaking factor will be used to adjust ridership. **Table 6** is an example of the assumptions and ridership calculations that will be used in this analysis.

Table 6: NFPA 130 Evacuation Analysis Example for End of Line Stations (Greenbelt, Franconia-Springfield, Largo Town Center)

#	NFPA 130 Inputs			
1	Metrorail Capacity	120	pax/car	WMATA
2	Escalator Width	4	ft	Site Inventory
3	Stair Width	5	ft	Site Inventory
4	Peaking Factor	1.28	-	WMATA
5	Missed Headway Factor	2.0	-	NFPA 130
6	Walking Speed	124	ft/min	NFPA 130
7	Vertical Walking Speed	48	ft/min	NFPA 130
8	Capacity for Stairs	19	pax/ft/min	NFPA 130
9	Fare Aisle Capacity	50	pax/min	NFPA 130



10	ADA Fare Aisle Capacity	75	pax/min	NFPA 130
#	Ridership Calculations	Amount	Description	Source/Formula
11	15-Minute Entries	Varies	Passengers	WMATA Faregate Data
12	15-Minute Exits*	Varies	Passengers	WMATA Faregate Data
13	Peak Headway	varies	Minutes	WMATA
14	Trains per 15-Minutes	х		= 15 / #13 (rounded)
15	Entries per Train	х	Passengers	= #11 / #14
16	Exits per Train	х	Passengers	= #12 / #14
17	Adjusted Entries per Train	х	Passengers	= #15 x #4 x #5
18	Adjusted Exits per Train	х	Passengers	= #16 x #4
19	Adjusted Total Passengers per Train	х	Passengers	= #17 + #18

^{*}At Archives, Federal Triangle, Gallery Place-Chinatown, and Metro Center, exits would be replaced with total passengers on board 8-car trains, totaling 960 passengers per track, and split between multiple station entrances if applicable.

Overall evacuation times will be calculated based on walking speeds, distances between elements, and any waiting times at vertical elements or faregate aisles, for existing conditions, future no-build, and future build.



Adam Recchia

From: McElhenny-Smith, Robin <rmcelhennysmith@wmata.com>

Sent: Monday, February 02, 2015 9:52 AM **To:** Adam Recchia; Wesolek, Danielle

Cc: David Miller

Subject: RE: Farecard Vending Machine Rates

Hi Adam-

We concur with you assumptions for the fare vending machine analysis.

Thanks, Robin

E. Robin McElhenny

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From: Adam Recchia [mailto:arecchia@foursquareitp.com]

Sent: Tuesday, January 27, 2015 2:08 PM **To:** McElhenny-Smith, Robin; Wesolek, Danielle

Cc: David Miller

Subject: Farecard Vending Machine Rates

Hi Robin,

I had one more thing to flush out with you: farecard vending machine rates.

Originally we were proposing what was used in the Foggy Bottom study: 20% of passengers will use them, and they can do 2.5 transactions per minute. After reviewing other studies (i.e. Naylor Road, White Flint) and testing smartrip loading times (we averaged 35 seconds total), we were thinking of using the following:

	% Using Fare Vending	Fare Vending Transactions per Minute	Reasoning
Greenbelt	4.0	1.67	Naylor Rd amounts, lots of commuters, likely do auto reload or are at least very familiar with process
Largo	4.0	1.67	Naylor Rd amounts, lots of commuters, likely do auto reload or are at least very familiar with process
Springfield	4.0	1.67	Naylor Rd amounts, lots of commuters, likely do auto reload or are at least very familiar with process
Archives	10.0	1.5	High commuter and tourist activity
Federal Triangle	10.0	1.67	More commuters than tourists

Gallery Place	20.0	1.5	High commuter and tourist activity
Metro Center	20.0	1.5	High commuter and tourist activity

Adam Recchia

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