

1 **U.S. General Services Administration**

2
3 **Record of Decision**

4 **for the Master Plan Amendment 2 for the**
5 **Department of Homeland Security Headquarters Consolidation**
6 **at St. Elizabeths West Campus in Washington, DC**

7
8 **1. Background and Purpose of and Need for the Proposed Action**

9
10 **1.1. Background**

11 One of the principal missions of the U.S. General Services Administration (GSA) is to provide secure
12 office space for Federal agencies throughout the United States, including the Washington, DC,
13 metropolitan area. GSA obtained control of the St. Elizabeths West Campus in Southeast,
14 Washington, DC, in 2004, in anticipation of meeting a portion of the need for secure Federal office
15 space in the National Capital Region (NCR).
16

17 On June 7, 2005, GSA published a Notice of Intent (NOI), and on June 28, 2007, a revised NOI, to
18 prepare an Environmental Impact Statement (EIS) in compliance with the National Environmental
19 Policy Act of 1969 (NEPA) for the proposed redevelopment of the St. Elizabeths West Campus. The
20 NOIs defined the purpose of the proposed action as “developing secure office space in the District of
21 Columbia to accommodate substantial Federal operations,” specifically the Consolidated
22 Headquarters of the Department of Homeland Security (DHS) and its components, in accordance
23 with the 2006 *DHS National Capital Region Housing Plan* and the 2007 *Consolidated Headquarters*
24 *Collocation Plan*.
25

26 GSA issued a Record of Decision (ROD) for the 2008 Final Master Plan EIS on December 16, 2008,
27 selecting the alternative that consolidated 4.5 million gross square feet of secure office and shared-
28 use space and associated parking on both the West and East Campuses at St. Elizabeths. As part
29 of the 2008 Final Master Plan EIS for this action, GSA also assessed, on a programmatic level, the
30 impacts of constructing 750,000 gross square feet of office space and associated parking on the St.
31 Elizabeths East Campus. GSA noted in its ROD that an EIS tiered to the 2008 Final Master Plan EIS
32 would be prepared for the East Campus.
33

34 On September 15, 2009, GSA published an NOI to prepare an EIS to address the amended 2008
35 *Department of Homeland Security Headquarters Consolidation Master Plan*. The NOI stated the
36 primary purpose of the action was “to complete the consolidation of DHS mission functions
37 comprising the Department’s Headquarters offices at St. Elizabeths for a total of 4.5 million gross
38 square feet of secure office and shared-use space plus associated parking” on the East Campus.
39 The 2012 Final Master Plan Amendment EIS was made public on March 2, 2012, and GSA issued a
40 ROD for the 2012 EIS on May 17, 2012. The 2012 Final Master Plan Amendment EIS was tiered
41 from the 2008 Final Master Plan EIS.

1 On November 19, 2018, GSA published an NOI to prepare an EIS for St. Elizabeths Master Plan
2 Amendment 2, which eliminates development on the East Campus and re-evaluates development
3 on the St. Elizabeths West Campus to accommodate 4.1 million gross square feet of secure office
4 and shared-use space, and 1.6 million gross square feet of associated parking, for the DHS
5 Headquarters consolidation. The Master Plan Amendment 2 Final EIS was issued for a 30-day
6 public review on August 28, 2020. Comments received during public review of the Master Plan
7 Amendment 2 Final EIS are provided in Appendix A along with GSA's responses.

8 9 **1.2. Purpose of and Need for the Proposed Action**

10 GSA's purpose for this proposed action is to support the continued consolidation of the DHS
11 Headquarters offices on the St. Elizabeths West Campus. The proposed Master Plan Amendment 2
12 eliminates development on the East Campus and re-evaluates development on the West Campus to
13 accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million
14 gross square feet of associated parking, on the West Campus only.

15
16 The proposed action is needed for efficiency, to reflect the current condition of the historic buildings,
17 to reduce costs, and to accelerate completion of the DHS consolidation.

18 19 20 **2. U.S. General Services Administration Decision**

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22 As Regional Commissioner of GSA's Public Buildings Service, and in support of DHS, it is my
23 decision to approve this ROD and thereby implement the Preferred Alternative – Alternative B. This
24 action is necessary as part of the redevelopment of the St. Elizabeths West Campus associated with
25 the DHS Headquarters consolidation. This ROD allows GSA to implement all portions of
26 development as outlined in the 2020 Master Plan Amendment 2 as analyzed in the Draft and Final
27 Master Plan Amendment 2 EISs.

28
29 The Preferred Alternative includes development on St. Elizabeths West Campus to accommodate
30 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square
31 feet of associated parking, to support the DHS Headquarters consolidation as described in Section
32 4.1.3 of the ROD. GSA will continue to support DHS in reducing its numerous and disparate leases
33 across the NCR to consolidate to the St. Elizabeths West Campus.

34
35 All practicable means of avoiding or minimizing environmental harm from the Preferred Alternative
36 will be adopted.

37 38 39 **3. Rationale for Decision**

40 The decision to implement the Preferred Alternative, as described in the Master Plan Amendment 2
41 Final EIS, is based on a balancing of likely adverse impacts on the National Historic Landmark
42 (NHL), with the pressing national security need for DHS to consolidate its headquarters at a single
43 secure site in the NCR. This decision takes into account resource concerns, DHS' national security
44 mission and program, and public interests as analyzed in past and ongoing NEPA documentation.

1 We reached our decision after careful consideration of the environmental analysis of the effects of
2 the action alternatives and the No Action Alternative in concert with the needs of DHS and the
3 community. Alternative B is preferable in terms of Campus Context, Quality and Operations, and
4 Construction Feasibility, as described below.

5 Campus Context

6 Landscape: Although Alternative B will result in more ground disturbance than Alternative A,
7 Alternative B's overall consolidated building footprint will have less of an impact than Alternative A.
8

9 Views: Alternative B's consolidated footprint will provide for more views than Alternative A.
10

11 Scale: Alternative B's building footprints will allow for the massing to step away from the South
12 Lawn.
13

14 Quality and Operations

15 Workplace Efficiency: Alternative B's two buildings on the plateau site are anticipated to be used by
16 two DHS components.
17

18 Identity: Alternative B's two buildings on the plateau site are anticipated to be used by two DHS
19 components.
20

21 Feasibility

22 Slope Stabilization: It is anticipated that the foundation of the proposed building along the ravine will
23 be used to provide stabilization of the slope under Alternative B. This strategy is considered a more
24 cost-effective strategy, conceptually, than using a slope stabilization method in addition to a
25 separate building foundation system.
26

27 Flexibility & Efficiency: Alternative B's two buildings on the plateau site are anticipated to be used by
28 two DHS components.
29

30 Due to the current economic and political climate, GSA assumes a 15-year development horizon for
31 the remaining DHS consolidation on the St. Elizabeths West Campus. The new development on the
32 plateau and Sweetgum Lane sites, and the total build-out of the DHS consolidation on the St.
33 Elizabeths West Campus, are projected to occur by 2035. This long-term approach is more
34 conservative because it allows for greater development flexibility. It does not mean, however, that
35 the consolidation will not occur earlier than the aforementioned horizon.
36
37

38 **4. Alternatives Considered**

39 **4.1. Alternatives Considered in the Master Plan Amendment 2 EIS**

41 During the initial planning for the Master Plan Amendment 2, urban planners, architects, architectural
42 historians, environmental scientists, engineers, and economists considered site constraints, traffic
43 impacts, and the mission of DHS to develop alternatives to support the DHS Headquarters
44 consolidation on the St. Elizabeths West Campus. GSA considered comments received during the
45 scoping period for the proposed action and a range of alternatives to accommodate the increase of

1 DHS employees and support staff at the West Campus. The 2020 Master Plan Amendment 2 Final
2 EIS addressed the No Action Alternative and two action alternatives for the DHS Headquarters
3 consolidation.

4 5 **4.1.1 No Action Alternative** 6

7 Under the No Action Alternative, GSA would develop the St. Elizabeths West Campus as described
8 in the Master Plan as approved by the National Capital Planning Commission (NCPC) on January 8,
9 2009. The development would provide 1,141,133 gross square feet of office and related space on
10 the plateau site, with no development on the Sweetgum Lane site, resulting in a total of 3.8 million
11 gross square feet of office and related space on the West Campus. This development would disturb
12 approximately 6 acres on the plateau site. Parking would be provided at a ratio of one parking space
13 for every four employees (1:4). On the West Campus, 1.2 million gross square feet of parking would
14 be constructed above and below grade. No buildings would be demolished within the plateau or
15 Sweetgum Lane sites under the No Action Alternative.

16
17 Master Plan Amendment 1, which was approved by NCPC in June 2012, included the development
18 of office space and parking on the North Parcel of the East Campus. The East Campus is under the
19 control of the District of Columbia; therefore, the construction of DHS facilities on the East Campus
20 is not feasible and was not included under the No Action Alternative.

21 22 **4.1.2 Alternative A** 23

24 Under Alternative A, 1.2 million gross square feet of office space would be organized into three
25 separate office structures (proposed Buildings A1, A2, and A3) organized around two open
26 courtyards on the plateau site, resulting in a campus setting that correlates to the organization of the
27 historic buildings on the St. Elizabeths West Campus. Building heights would likely be designed to
28 reach between three and eight stories. The largest part of the structures would generally have an
29 east-west orientation, which would be ideal for optimizing the use of daylight and energy efficiency.
30 The building organization also relates well to the direction of stormwater flow from east to west. The
31 central open courtyards would be tiered from east to west, in conjunction with site topography.
32 Buildings could be linked below grade at these elevation drops to facilitate internal circulation, fit
33 naturally on the site, and minimize the need to disturb existing topography and vegetation. Building
34 A1 would be stepped down into the ravine near the Building 56/57 to stabilize the slope in that area.
35 Building 56/57 would be integrated into the design of Building A1. Buildings 52 and 64 would be
36 retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, 68, and 69, which total 97,685
37 gross square feet, would be demolished under Alternative A. Approximately 7 acres of the plateau
38 site would be disturbed as a result of demolition and construction activities under Alternative A.

39
40 Under Alternative A, 175,000 gross square feet of office space (proposed Building C1) would be
41 constructed on the Sweetgum Lane site, organized into primarily below-grade construction, with one
42 two-story building constructed to mirror the northwest corner of the Munro Building. The building
43 would include up to three below-grade levels, which would take advantage of the site slope from
44 east to west, allowing the western edge of the building to receive daylight. A central courtyard would
45 provide internal daylighting; the building could be linked below grade to the DHS Operations
46 Centers. Building 15, which totals 2,749 gross square feet, would be demolished under Alternative

1 A. Approximately 1.5 acres of the Sweetgum Lane site would be disturbed as a result of demolition
2 and construction activities under Alternative A.

3
4 Under Alternative A, an additional 1,014 employee parking spaces would be provided on the West
5 Campus resulting in a 1:4 parking ratio. The new spaces would be added to the previously proposed
6 underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

7
8 Detailed building and site design of the plateau and Sweetgum Lane sites would define the following
9 improvements:

- 10
- 11 • Sidewalk locations and walkways between buildings
- 12 • Alterations to the ravine including enhanced pedestrian connections and landscaping
- 13 • Engineering for stabilization of steep slopes including building foundations
- 14 • Realignment of site drainages and landscaping in response to building design
- 15 • Shuttle bus drop-off locations
- 16 • Shipping/receiving areas for buildings
- 17 • Electric power, communications, and utility corridors
- 18 • Stormwater management controls
- 19 • Remediation of contaminated soils

20

21 **4.1.3 Alternative B (The Preferred Alternative)**

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23 Under Alternative B, 1.2 million gross square feet of office space will be provided in two separate
24 office structures (proposed Buildings B1 and B2) organized around two enclosed courtyards on the
25 plateau site. Building heights will be designed to reach between three and eight stories. The largest
26 part of the structures will have an east-west orientation to optimize the use of daylight and energy
27 efficiency. The building organization also relates well to the direction of stormwater flow from east to
28 west.

29
30 The courtyards will be secured to provide open space for building occupants. Buildings could be
31 linked below grade at these elevation drops to facilitate internal circulation. The buildings will fit
32 naturally on the site minimizing the need to disturb existing topography and vegetation on the
33 plateau site. Building B1 will be stepped down into the ravine near Building 56/57 to stabilize the
34 slope in that area. Building 56/57 will be integrated into the design of Building B1. Buildings 52 and
35 64 will be retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, and 68, which total
36 70,277 gross square feet, will be demolished under Alternative B. Building 69, which is 27,588 gross
37 square feet, will be evaluated by GSA to determine if it can be feasibly retained and used as Federal
38 office space. GSA will report findings to the Memorandum of Agreement (MOA) Consulting Parties
39 and consider their comments on the findings. Approximately 8 acres of the plateau site will be
40 disturbed as a result of demolition and construction activities under Alternative B.

41
42 Under Alternative B, 175,000 gross square feet of office space will be constructed on the Sweetgum
43 Lane site (proposed Building C1) in the same manner as Alternative A. Building 15, which totals
44 2,749 gross square feet, will be demolished under Alternative B. Approximately 1.5 acres of the
45 Sweetgum Lane site will be disturbed as a result of demolition and construction activities under
46 Alternative B.

Under Alternative B, an additional 1,014 employee parking spaces will be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces will be added to the previously proposed underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

Detailed building and site design of the plateau and Sweetgum Lane sites will define the following improvements:

- Sidewalk locations and walkways between buildings
- Alterations to the ravine including enhanced pedestrian connections and landscaping
- Engineering for stabilization of steep slopes including building foundations
- Realignment of site drainages and landscaping in response to building design
- Shuttle bus drop-off locations
- Shipping/receiving areas for buildings
- Electric power, communications, and utility corridors designed for buildings and site improvements
- Stormwater management controls
- Remediation of contaminated soils

4.2. Alternatives Dismissed from Further Detailed Analysis

During the process of defining viable alternatives, GSA investigated several sites on the St. Elizabeths West Campus for new development that were subsequently dismissed from further detailed analysis. Descriptions of the dismissed alternatives and the rationale for dismissal are provided in Section 2.5 of the Master Plan Amendment 2 Final EIS.

5. Environmental Consequences of the Preferred Alternative

Potential environmental consequences from implementing the Preferred Alternative have been identified by resource area and are summarized in Table 1.

Table 1. Summary of Impacts of the Preferred Alternative

Issue	Alternative B
Natural Resources	
Geology, Topography, and Soils	<ul style="list-style-type: none"> • No impacts to geology • Direct, long-term, minor adverse impacts to topography • Direct and indirect, long-term, minor, adverse impacts from the removal of soils • Disturbance of 1 acre of soil by demolition • Total soil disturbance from construction of 9 acres • Direct, long-term, moderate, adverse impacts due to soil erosion and risk of slope failure • No indirect impacts to topography will occur • Indirect, beneficial impacts from the reduction in the potential for slope failure and soil erosion • Minor, long-term, adverse, cumulative impacts when combined with planned development on the West Campus and the surrounding vicinity

Issue	Alternative B
Groundwater	<ul style="list-style-type: none"> • Direct, long-term, minor adverse impact from the potential to intercept the perched groundwater table from construction of buildings • Direct, long-term, minor, adverse impacts to buildings from potential groundwater infiltration • Indirect, long-term, minor, adverse impacts from an increase in impervious surface • Increase of impervious surface by 3 acres • Negligible, long-term, adverse, cumulative impacts to groundwater when combined with other past and future projects
Surface Water	<ul style="list-style-type: none"> • No direct impacts to surface water • Indirect, short-term, negligible, adverse impacts to water quality from construction activities • Indirect, long-term, negligible, adverse impacts to surface water • No long-term impacts to the perennial stream and adjacent wetlands along the southwest property boundary • 43% increase in impervious surface in the study area • 0.024% increase in impervious surface in the Lower Anacostia River Watershed • 0.011% increase in impervious surface in the Anacostia River Watershed • Minor, long-term, adverse, cumulative impacts from a slight, but detectable contribution to surface water impacts from other past, present, and future projects
Vegetation	<ul style="list-style-type: none"> • No direct impacts to specimen trees on Sweetgum Lane • Direct, long-term, moderate, adverse impacts from the removal of vegetation on the plateau and Sweet Gum Lane sites • Removal of 4 acres of vegetation and 9 specimen trees • Beneficial impacts from landscaping • No indirect impacts to vegetation • Minor, long-term, adverse, cumulative impacts
Wildlife	<ul style="list-style-type: none"> • Direct, short-term, minor, adverse impacts to wildlife during construction from noise and/or displacement of wildlife • Direct, long-term, minor, adverse impacts from habitat loss • Direct, short- and long-term, minor, adverse impacts on migratory birds from removal of forest • Indirect, long-term, moderate, adverse impacts from loss of habitat • Minor, long-term, adverse, cumulative impacts from a slight, but detectable contribution to vegetation impacts from other past, present, and future projects
Cultural Resources	
Historic Properties and Buildings	<ul style="list-style-type: none"> • Beneficial impacts from the rehabilitation of contributing buildings • Direct, long-term, minor to moderate, adverse impact on the design, workmanship, setting, feeling, and association of buildings • Proposed buildings will be located further from the ravine; adverse impact is lessened when compared to Alternative A • Direct, long-term, major, adverse impacts from the removal of 6 contributing buildings and the visual zone of the South Lawn • Indirect, long-term, moderate, adverse impacts on views from Congress Heights • Major, long-term, adverse, cumulative impacts

Issue	Alternative B
Landscape Resources	<ul style="list-style-type: none"> • Adverse impacts intensified from the 2008 EIS; direct, long-term, major, adverse impacts on the Power House ravine • Direct, long-term, major, adverse impacts to historic vehicular and pedestrian circulation on the campus • Direct, long-term, major, adverse impacts to views and visual zones on the plateau site from new construction • Direct, long-term, moderate, adverse impacts of views of the Sweetgum Lane site • Major, long-term, adverse, cumulative impacts
Social and Economic Resources	
Land Use, Planning, and Zoning	<ul style="list-style-type: none"> • Beneficial impacts on land use planning and zoning • No direct adverse impacts to land use planning and zoning • No indirect impacts to land use planning, and zoning • No cumulative impacts
Population and Housing	<ul style="list-style-type: none"> • No direct impacts to population and housing • Indirect, long-term, minor, adverse impact on housing stocks from the relocation of employees • Negligible, long-term, adverse, cumulative impacts when combined with the cumulative impacts of other past, present, and future projects
Environmental Justice	<ul style="list-style-type: none"> • No disproportionate direct, adverse impacts to low-income populations, minority residents, elderly, or children • Indirect, short-term, negligible, adverse impacts to local communities • Beneficial impacts from the removal of hazardous materials • Minor, long-term, beneficial, cumulative impacts from remediation of contamination within the plateau site
Economy, Employment, and Income	<ul style="list-style-type: none"> • Beneficial impacts from an increase in employment and personal income • Indirect long-term, minor, and adverse impacts from construction and renovation • Minor, long-term, beneficial, cumulative impacts
Taxes and Revenue	<ul style="list-style-type: none"> • No direct impact to taxes and revenue • Beneficial indirect impacts from an increase in tax revenue during construction • Minor, beneficial, cumulative impacts
Community Services	<ul style="list-style-type: none"> • No direct impacts to community services. • Indirect, long-term, minor, adverse impacts from a modest increase in calls for service • Minor, long-term, adverse, cumulative impacts
Community Facilities	<ul style="list-style-type: none"> • No direct impacts to community facilities • Indirect, long-term, negligible, adverse impact from an increase in use of community facilities • Negligible, long-term, adverse, cumulative impacts when combined with the impacts of other past, present, and future projects

Issue	Alternative B
Air Quality	
Air Quality	<ul style="list-style-type: none"> • Direct, short-term, minor, adverse impacts from construction emissions • Direct, long-term, minor, adverse impacts from stationary sources • No new adverse impacts from vehicle emissions • No additional mobile source air toxics (MSAT) impacts compared to Master Plan Amendment 1 • Total volatile organic compounds (VOC) and nitrogen oxides (NO_x) emissions below <i>de minimis</i> thresholds • Long-term, minor, adverse impacts from operation of the CUP and increase in traffic volumes • No increase in greenhouse gas (GHG) emissions compared to Master Plan Amendment 1 • Minor, short- and long-term, adverse, cumulative impacts
Noise	
Noise	<ul style="list-style-type: none"> • Short- and long-term, minor, adverse impacts • No new traffic noise impacts • Minor, short- and long-term, adverse, cumulative impacts
Transportation	
Transportation	<ul style="list-style-type: none"> • Long-term, minor, adverse impacts to traffic conditions in the vicinity of St. Elizabeths • Minor, long-term, adverse, cumulative impacts
Utilities	
Electrical Service	<ul style="list-style-type: none"> • Direct, short-term, minor, adverse impacts from disruptions in electrical service • Direct, long-term, minor, adverse impacts from a slight increase in electrical demand. • Indirect, negligible, adverse impacts to regional electrical service • Minor, long-term, adverse cumulative impacts
Natural Gas Service	<ul style="list-style-type: none"> • Direct, short-term, negligible, adverse impacts from non-discernable disruption to onsite natural gas service during construction • Direct, long-term, minor, adverse from an increase in demand • Indirect, negligible, adverse impacts • Minor, long-term, adverse cumulative impacts
Water Service	<ul style="list-style-type: none"> • Direct, short-term minor, adverse impacts from disruptions in water service during construction • Direct, long-term, minor, adverse impacts from an increase in water demand • Indirect, negligible, adverse impacts • Minor, long-term, adverse cumulative impacts
Sanitary Sewer System	<ul style="list-style-type: none"> • Direct, short-term minor, adverse impacts from disruptions in sewer service during construction • Direct, long-term, minor, adverse impacts from an increase in sewage treated by the District of Columbia Water and Sewer Authority (DC Water) • Indirect, long-term negligible, adverse impacts • Minor, long-term, adverse cumulative impacts
Solid Waste Management	<ul style="list-style-type: none"> • Direct, short-term minor, adverse impacts from increases in solid waste during construction • Direct, long-term, minor, adverse impacts from an increase in solid waste • Indirect, long-term minor, adverse impacts from an increase in the waste stream at the Covanta Waste to Energy Plant • Minor, long-term, adverse cumulative impacts

Issue	Alternative B
Environmental Contamination	
Environmental Contamination	<ul style="list-style-type: none"> • Direct, short-term, minor, adverse impact from a slight, but detectable, increase of environmental contaminants sent to U.S. Environmental Protection Agency (EPA)-approved landfills • Beneficial impacts from removal of hazardous materials in renovated buildings and removal of fly ash and contaminated soils • Beneficial, cumulative impacts

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6. Environmentally Preferable Alternative

40 Code of Federal Regulations [CFR] § 1505.2(a) of the Council on Environmental Quality (CEQ) regulations implementing the procedural requirements of NEPA requires Federal agencies, including GSA, to “identify alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives considered environmentally preferable.” GSA has outlined the environmentally preferable alternative(s) by resource area to reflect the balanced approach necessary when evaluating the Master Plan Amendment 2. Table 2 presents the environmentally preferable alternative by resource area as identified by the impact analyses in the Final EIS. The No Action Alternative is the environmentally preferable alternative for natural and cultural resources. The No Action Alternative would result in less ground disturbance and impact fewer trees than Alternatives A and B. The No Action Alternative would also retain more historic resources than Alternatives A and B. Alternatives A, B, and the No Action Alternative, are the environmentally preferable alternatives for social and economic resources, air quality, noise, transportation, utilities, and environmental contamination because impacts are similar among the alternatives.

Table 2: Environmentally Preferable Alternative(s) by Resource Area

Issue	No Action Alternative	Alternative A	Alternative B
Natural Resources	X		
Cultural Resources	X		
Social and Economic Resources	X	X	X
Air Quality	X	X	X
Noise	X	X	X
Transportation	X	X	X
Utilities	X	X	X
Environmental Contamination	X	X	X

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1 **7. Public Involvement**

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3 **7.1. Public and Agency Review of the Master Plan Amendment 2 EIS**

4 Throughout preparation of the Master Plan Amendment 2 Draft and Final EISs, GSA consulted with
5 numerous Federal and local agencies and community groups, stakeholders, and members of the
6 public. The intent of the consultation was to provide information on the project, solicit information on
7 issues that could affect the outcome of the project, and seek input on alternatives and potential
8 impacts. DHS, NCPC, and the District of Columbia Department of Transportation (DDOT) were
9 designated as “cooperating agencies” on the preparation of the Master Plan Amendment 2 EIS and
10 input from them has been incorporated into the documentation.

11
12 **7.2. Master Plan Amendment 2 Scoping**

13 Pursuant to the CEQ regulations implementing NEPA (40 CFR § 1500–1508), and the GSA Public
14 Buildings Service NEPA Desk Guide, GSA published an NOI to prepare the Master Plan
15 Amendment 2 EIS in the Federal Register on November 19, 2018. The NOI was also published on
16 November 19, 2018, in *The Washington Post*, *The Informer*, and *The Afro-American*.

17
18 From November 19, 2018, through December 19, 2018, the public was given an opportunity to
19 participate in the scoping process for Master Plan Amendment 2. “Scoping” is a tool for identifying
20 the issues that should be addressed in the EIS and is also used as part of the Section 106
21 compliance process to identify historic properties and begin to assess potential effects. Public
22 participation during scoping helps define priorities and provides an avenue for stakeholders and
23 communities to provide early input.

24
25 During the scoping process for Master Plan Amendment 2, a public meeting was held on November
26 29, 2018, at R.I.S.E. Demonstration Center on the St. Elizabeths East Campus, during which
27 comments and concerns were officially documented. The scoping period and meeting were
28 announced in the newspapers with the NOI and were also announced on the project website at
29 www.stelizabethsdevelopment.com/nepa.html.

30
31 **7.3. Master Plan Amendment 2 Draft EIS, Public Review Period, and Public Hearing**

32 A Notice of Availability (NOA) for the Draft EIS was published in the Federal Register on May 8,
33 2020. A notification letter of the Draft EIS availability was sent to 308 potentially interested parties,
34 including Federal, state, and local agencies having jurisdiction by law or subject matter expertise,
35 and to any person, organization, stakeholder group, or agency that had expressed interest in
36 reviewing the Draft EIS during the scoping process. A 55-day comment period for the Draft EIS was
37 initially provided from May 8, 2020, to July 2, 2020. Notices of the Draft EIS availability and comment
38 period were published on May 8, 2020, in *The Washington Post*, May 9, 2020, in *The Afro-American*,
39 and in the May 2020 edition of *East of the River Magazine*. Availability of the Draft EIS was also
40 announced on the project website at www.stelizabethsdevelopment.com/nepa.html where the Draft
41 EIS was available electronically to view and/or download. The public and agencies were encouraged
42 to submit written comments on the Draft EIS by mail or email.

1 Due to the requirements for social distancing related to COVID-19, GSA made alternate
2 arrangements in lieu of a traditional public hearing on the Draft EIS. On June 30, 2020, GSA notified
3 the public and agencies by letter and/or email of the availability of a pre-recorded presentation online
4 at www.gsa.gov/ncrnepea, or by phone at (410) 777-9538, from July 1, 2020, through July 16, 2020.
5 The phone line established for the project presentation included an option to record a message with
6 comments on the Draft EIS. An amended notice was also published in the Federal Register on July
7 2, 2020, extending the comment period to July 16, 2020. The June 30, 2020, notification also
8 informed the public and agencies of the comment period extension.

9
10 In total, five comment letters were received during the Draft EIS public review period. All comments
11 on the Draft EIS were considered during the preparation of the Final EIS. Appendix H of the Final
12 EIS includes the NOA and other public outreach materials for the Draft EIS, and all substantive
13 comments on the Draft EIS that were received during the 70-day public review period, as well as
14 responses to those comments.

15 16 **7.4. 2020 Final EIS Public Review Period**

17 An NOA for the Final EIS was published in the Federal Register on August 28, 2020. A notification
18 letter of the Final EIS availability was sent to 292 potentially interested parties, including Federal,
19 state, and local agencies having jurisdiction by law or subject matter expertise, and to any person,
20 organization, stakeholder group, or agency that had expressed interest in reviewing the Final EIS. A
21 30-day review period for the Final EIS was provided from August 28, 2020, to September 28, 2020.
22 Notices of the Final EIS availability and review period were published on August 28, 2020, in *The*
23 *Washington Post*, August 29, 2020, in *The Afro-American*, and in the September 2020 edition of
24 *East of the River Magazine*. Availability of the Final EIS was also announced on the project website
25 at www.stelizabethsdevelopment.com/nepa.html where the Final EIS was available electronically to
26 view and/or download.

27
28 Comments received during public review of the Master Plan Amendment 2 Final EIS are provided in
29 Appendix A along with GSA's responses.

30 31 **7.5. Consultation with Agencies, Organizations, and Affected Persons**

32 **7.5.1 General Consultation**

33
34 Throughout the project planning for DHS Headquarters consolidation at St. Elizabeths, GSA has
35 been seeking input from Federal and local agencies and stakeholders, as well as Consulting Parties,
36 regarding the proposed action and ways to avoid or minimize adverse impacts. Since September
37 2005, GSA has been regularly meeting with agencies and stakeholders associated with St.
38 Elizabeths that might be affected by the redevelopment, including the Advisory Council on Historic
39 Preservation (ACHP), Advisory Neighborhood Commission 8C, Committee of 100 on the Federal
40 City, Cultural Landscape Foundation, DC Preservation League, DC Office of Planning, DC State
41 Historic Preservation Office (DCSHPO), Federal Highway Administration (FHWA), Joint Base
42 Anacostia-Bolling, NCPA, National Association of Olmsted Parks, National Park Service, National
43 Trust for Historic Preservation, St. Elizabeths Hospital, U.S. Commission of Fine Arts, DDOT, and

1 DHS. In addition, GSA has sought consultation with the Delaware Nation, a federally recognized
2 American Indian tribe.

3 4 **7.5.2 Section 106 Consultation**

5
6 Pursuant to Section 106 of the National Historic Preservation Act (NHPA), a Programmatic
7 Agreement (PA) for the DHS Headquarters consolidation was executed in December 2008 between
8 GSA, DHS, ACHP, DCSHPO, NCPC, and FHWA. The PA identifies steps to avoid, minimize, or
9 mitigate adverse effects on historic properties from the Master Plan development, design and
10 landscape guidelines, and mitigation requirements; and outlines the process by which projects on
11 the St. Elizabeths West Campus are to be reviewed to ensure ongoing compliance with Section 106.
12 The process includes continued consultation with the signatories and other Consulting Parties to
13 explore alternatives to avoid and minimize harm to historic properties and to develop and consult on
14 the terms of a MOA to mitigate adverse effects. To date, GSA has executed seven MOAs for
15 development projects on the West Campus, including the MOA for Master Plan Amendment 2
16 executed in September 2020. The MOA for Master Plan Amendment 2 is included in Appendix B of
17 this ROD.

18 19 20 **8. Mitigation Measures Related to the Preferred Alternative**

21
22 Under NEPA, appropriate mitigation measures that have not already been included in the proposed
23 action or alternatives should be addressed. Mitigation is defined at 40 CFR § 1508.1(s) as
24 “measures that avoid, minimize, or compensate for effects caused by a proposed action or
25 alternatives as described in an environmental document or record of decision and that have a nexus
26 to those effects.” The mitigation measures recommended in the Master Plan Amendment 2 Final EIS
27 to be implemented as part of the proposed action (per 40 CFR § 1505.2[c]) and best management
28 practices (BMPs) required to maintain compliance with Federal and local environmental laws and
29 regulations are presented in the following sections.

30 31 **8.1. Cultural Resources Mitigation Measures**

32 Mitigation measures are identified in the 2008 PA for the redevelopment of St. Elizabeths to address
33 potential adverse effects on the St. Elizabeths Hospital NHL and in subsequent MOAs in compliance
34 with Section 106 of the NHPA. Mitigation measures for cultural resources affected by Master Plan
35 Amendment 2 are detailed in the MOA for the Master Plan Amendment 2 executed in September
36 2020 (Appendix B).

37 38 **8.2. Natural Resources Mitigation Measures**

39 **Geology, Topography, and Soils.** Erosion and sediment controls will be employed during
40 demolition and construction where ground-disturbing activities occur. These controls will minimize
41 impacts to surface water from sedimentation and other pollutants by containing erodible materials
42 within the limits of construction. GSA will employ more than one containment method, including, but
43 not limited to, silt fencing, dewatering filter bags, diversion channels or berms, temporary stormwater

1 basins or sediment traps, temporary inlet protection, stabilized construction entrances, and
2 vegetation stabilization.

3
4 Buildings will be structurally engineered to mitigate the presence of Potomac Group deposits with
5 the potential for shrinking or swelling.

6
7 Prior to construction, GSA will obtain all necessary permits and comply with the requirements and
8 guidelines set forth in those permits to minimize adverse impacts. Erosion and sediment control
9 plans will be developed in accordance with the DC Department of Energy and Environment (DOEE)
10 requirements and will be submitted to DOEE for approval. Construction contractors will be required
11 to implement and maintain these erosion and sediment control measures until construction is
12 complete and vegetation has been established.

13
14 GSA will contract with an independent environmental monitor (IEM), separate from the construction
15 contractor, to verify that construction complies with all terms and conditions of the permits and
16 approvals. The IEM will inspect erosion and sediment control devices to ensure they are being
17 sufficiently maintained and are effective, in addition to other identified responsibilities. The IEM will
18 report deficiencies to the contractor, GSA, and regulatory agencies, if required, and support efforts to
19 resolve issues in a timely manner. GSA will hold the construction contractor responsible for
20 maintaining compliance and for expeditiously responding to deficiencies identified by the IEM.

21
22 When construction is complete, exposed soils will be stabilized with landscaping to minimize
23 potential future soil erosion. Following construction, GSA will continue to monitor and maintain the
24 efficacy of erosion and sediment control devices and stormwater management facilities.

25
26 Slope stabilization measures, such as closely spaced drilled piers, will be utilized for construction on
27 steep slopes to mitigate possible future slope failure. During the building design process, GSA will
28 also consider the use of retaining walls to stabilize slopes.

29
30 **Groundwater.** During the building design process, GSA will consider the use of infiltration devices to
31 mitigate the increase in impervious area. Infiltration devices capture stormwater before it flows into
32 storm sewers or streams and allow it to soak into the ground.

33
34 Several of the proposed buildings will be partially below ground. The underground portions of these
35 buildings could reach a zone of perched groundwater, leading to the potential intrusion of
36 groundwater into the buildings. As part of the building design process, geotechnical engineering will
37 be undertaken as mitigation to verify stormwater and groundwater conditions on the building site,
38 and buildings will be designed and constructed to mitigate potential groundwater intrusion.

39
40 **Surface Water.** Erosion and sediment controls will be employed during demolition and construction
41 to minimize indirect impacts to surface water from sedimentation and other pollutants by containing
42 erodible materials within the limits of construction. GSA will employ more than one containment
43 method that may include silt fencing, dewatering filter bags, diversion channels or berms, temporary
44 stormwater basins or sediment traps, temporary inlet protection, stabilized construction entrances, or
45 vegetation stabilization.

1 Prior to construction, GSA will obtain all necessary permits and comply with the requirements and
2 guidelines set forth in those permits to minimize adverse impacts. Stormwater management plans
3 will be prepared in accordance with the *St. Elizabeths Utility Integration Plan Overall Stormwater*
4 *Program* and approved by DOEE prior to implementation. National Pollutant Discharge Elimination
5 System (NPDES) permit coverage for stormwater discharges under the EPA Construction General
6 Permit will also be obtained. Erosion and sediment control plans will be developed in accordance
7 with the DOEE requirements and submitted to DOEE for approval. Construction contractors will be
8 required to implement and maintain these erosion and sediment control measures until construction
9 is complete, vegetation has been established, and permanent stormwater controls are in place.
10 Implementation of permanent controls for stormwater quantity and quality outlined in the *St.*
11 *Elizabeths Utility Integration Plan Overall Stormwater Program*, including stormwater retention
12 ponds, green roofs, infiltration/bioretention practices, and water quality inlets, will help contain
13 sediment and other materials to minimize long-term impacts to water quality.
14

15 GSA will contract with an IEM, separate from the construction contractor, to verify that construction
16 complies with all terms and conditions of the permits and approvals. The IEM will inspect erosion
17 and sediment control devices to ensure they are being sufficiently maintained and are effective, in
18 addition to other identified responsibilities. The IEM will report deficiencies to the contractor, GSA,
19 and regulatory agencies, if required, and support efforts to resolve issues in a timely manner. GSA
20 will hold the construction contractor responsible for maintaining compliance and for expeditiously
21 responding to deficiencies identified by the IEM.
22

23 Indirect impacts to surface waters will be reduced over the long-term through the incorporation of
24 onsite stormwater controls. During the building design process, GSA will consider incorporating
25 green infrastructure and low impact development techniques, including bioretention facilities,
26 permeable pavement, bioswales, bio-planters, green roof systems, subsurface structural BMPs, wet
27 ponds, and rooftop disconnection. Following construction, GSA will continue to monitor and maintain
28 the efficacy of erosion and sediment control devices and stormwater management facilities. Also,
29 integrated pest management and turf maintenance practices will be used during landscaping to
30 mitigate the long-term, indirect impacts to surface waters from pesticide and fertilizer applications
31 used on landscaped areas.
32

33 **Vegetation.** Vegetation will be cleared only as necessary and parking and storage of construction
34 vehicles and equipment will be relegated to assigned staging areas to minimize impacts. Temporary
35 fencing will be placed around or beyond the drip line of remaining trees to protect roots from soil
36 compaction. GSA will consider incorporating green roofs into building designs to mitigate the loss of
37 function, such as stormwater capture and habitat, from the removal of vegetation. To mitigate
38 impacts, native vegetation will be planted, and trees will be replaced at a 3:1 ratio to allow for plant
39 survival rates. Trees with a diameter larger than 36-inches will be replaced at a 5:1 ratio.
40 Replacement tree size will have a minimum diameter of 2.5-inches. Tree protection measures will be
41 implemented with new plantings to prevent deer browse. Additionally, GSA will prevent
42 establishment of invasive species and will institute an Integrated Pest Management Program to
43 control the use of fertilizers, herbicides, and other chemicals used for landscaping.
44

45 **Wildlife.** Construction fencing will be used to minimize impacts to wildlife from construction activities.
46 Larger wildlife species will be removed from the construction zone prior to installing fencing to

1 prevent isolating animals within the fenced area. GSA will consider landscaping with native species
2 and with species that provide habitat and food sources such as sumac (*Rhus sp.*), serviceberry
3 (*Amelanchier sp.*), and elderberry (*Sambucus canadensis*) to mitigate habitat loss. During the
4 building design process, GSA will also consider planting evergreen species to provide additional
5 shelter for wildlife species and deer-resistant landscaping to mitigate impacts from white-tailed deer.
6 A deer control study will identify the best methods for deer management on the West Campus. Trees
7 to be planted will include tree protection measures to prevent deer browse from the remaining deer
8 populations within the West Campus.

9
10 To minimize potential impacts to migratory birds, a pre-construction survey will be performed to
11 determine the presence of nests within the limits of ground disturbance. If nests are identified, GSA
12 will avoid vegetative clearing during the nesting period for those species. Trees removed for
13 construction will be replaced to provide long-term mitigation for impacts to migratory bird habitat.

14 **8.3. Social and Economic Resources Mitigation Measures**

15
16 **Land Use, Planning and Zoning.** No mitigation measures are proposed for land use, planning, and
17 zoning.

18
19 **Population and Housing.** No mitigation measures are proposed for population and housing.

20
21 **Environmental Justice.** No mitigation measures are proposed for environmental justice.

22
23 **Economy, Employment, and Income.** GSA will continue to connect construction contractors
24 working on the West Campus redevelopment with the District of Columbia Department of
25 Employment Services and other workforce development and training organizations to assist in
26 meeting the goals of the St. Elizabeths project's small business and hiring efforts. As with past
27 activities on the West Campus, GSA will share the posting of employment and small business
28 opportunities via email group and the St. Elizabeths website (www.stelizabethsdevelopment.com).
29 GSA will continue to hold monthly virtual training and informational meetings with various community
30 stakeholders (e.g., workforce development, Advisory Neighborhood Commissioners, District
31 Government, DHS, U.S. Coast Guard representatives, local small businesses, and general
32 contractors) to distribute information regarding upcoming opportunities.

33
34 **Taxes and Revenue.** No mitigation measures are proposed for taxes and revenue.

35
36 **Community Services.** No mitigation measures are proposed for community services.

37
38 **Community Facilities.** No mitigation measures are proposed for community facilities.

39 **8.4. Air Quality Mitigation Measures**

40
41 The regulatory requirements and best practices identified in Section 5.5.4 of the 2012 EIS to address
42 air quality impacts remain applicable to Master Plan Amendment 2 and include the following:
43

- 1 • Taking precautionary measures aimed at minimizing short-term increases in dust
- 2 particulates, and equipment-related emissions during the construction
- 3 • Certifying the absence of asbestos-containing materials for the demolition of
- 4 buildings
- 5 • Fully evaluating crushing operations for control of fugitive emissions and permitting
- 6 requirements
- 7 • Complying with anti-idling regulations in the District of Columbia

8

9 **8.5. Noise Mitigation Measures**

10 The regulatory requirements and best practices identified in the 2008 and 2012 EISs to address
11 noise impacts during construction related activities and facilities operations remain applicable to
12 Master Plan Amendment 2 and include the following:

13

- 14 • All construction equipment powered by an internal combustion engine will be
- 15 equipped with a properly maintained muffler
- 16 • Air compressors will meet current EPA noise emission standards
- 17 • Newer model construction equipment will be used as much as possible since it is
- 18 generally quieter than older equipment
- 19 • Nighttime construction activities will be minimized
- 20 • Portable noise barriers within the equipment area and around stationary noise
- 21 sources will be established
- 22 • Tools and equipment will be selected to minimize noise
- 23 • Industrial silencers will be installed on stand-by generators

24

25 **8.6. Transportation Mitigation Measures**

26 Given the projected degradation of operations at the Gate 1 intersection, the traffic analysis
27 conducted as part of the Master Plan Amendment 2 considered potential roadway improvement
28 options on Martin Luther King Jr. Avenue SE to minimize delays. Based on the results of the
29 analysis, GSA recommends incorporating a continuous right-turn lane on Martin Luther King Jr.
30 Avenue SE to address the delay at the Gate 1 intersection while maintaining operationally
31 acceptable levels of service (LOS D or better) in all other traffic movements.

32

33 Measures to mitigate impacts from construction traffic will be defined as part of the design process
34 during each phase of construction.

35

36 **8.7. Utilities Mitigation Measures**

37 **Electrical Service.** Facilities will be designed to reduce energy consumption as mitigation. Energy
38 efficiency will be promoted through GSA's goal to achieve the LEED Gold rating on new
39 construction. GSA will incorporate energy conservation measures into building designs to reduce
40 demand on electrical services. These measures may include building orientation, daylighting (i.e.,
41 using natural sunlight to potentially reduce energy needs for interior lighting), and installing energy-
42 efficient lighting and heating and cooling systems.

43

1 **Natural Gas Service.** Facilities will be designed to be energy and water efficient thus reducing
2 demand on the CUP which utilizes natural gas. Energy efficiency will be promoted as mitigation
3 through GSA's goal to achieve the LEED Gold rating on new construction.
4

5 **Water Service.** Water consumption will be mitigated through GSA's goal to achieve a LEED Gold
6 rating on new construction. GSA will consider reducing water consumption by installing native and
7 drought-tolerant plants in landscaping that require less watering, reusing gray water for irrigation,
8 installing water-saving faucets and toilets in bathroom and kitchen facilities, and changing custodial
9 operations to minimize demand for potable water.
10

11 **Sanitary Sewer System.** Reduced water consumption will result in an associated reduction in
12 sanitary sewer volumes. Measures to reduce water consumption are described above. Upgrading
13 the sanitary sewer collection system on the plateau and Sweetgum Lane sites will also provide
14 mitigation and reduce demand by fixing damaged pipes that are allowing stormwater to infiltrate the
15 sewer system.
16

17 **Solid Waste Management.** Recycling programs will serve as mitigation and will be implemented
18 during construction and operation of facilities at the plateau and Sweetgum Lane sites to reduce the
19 volume of solid waste leaving the West Campus for disposal.
20

21 **8.8. Environmental Contamination Mitigation Measures**

22 Prior to disrupting contaminated soils, areas with recognized environmental conditions will be
23 characterized for removal and disposal by a licensed contractor in compliance with required waste
24 characterization protocols. Prior to the commencement of demolition or renovation activities, it may
25 be necessary to abate asbestos containing material (ACM), lead-based paint (LBP), polychlorinated
26 biphenyl (PCB), and mercury. GSA will ensure that all necessary abatements are properly
27 completed in accordance with applicable laws and regulations. Development will not occur until all
28 appropriate conditions have been met and regulator certifications or notices of closure have been
29 obtained.
30

31 Engineering controls, including dust suppression and worker personal protective equipment (i.e.,
32 gloves and eye protection), will be used, and a work plan will be developed and implemented, to
33 protect the health and safety of site workers during the removal of hazardous materials and
34 contaminated soils.
35

36 **8.9. Mitigation Measures Outside the Jurisdiction of GSA**

37 Roadway improvements will be required along Martin Luther King Jr. Avenue SE at the Gate 1
38 intersection to provide acceptable current and future LOS under the Preferred Alternative. GSA will
39 continue to coordinate with DDOT for their approval of final designs for the intersection
40 improvements, as well as to determine appropriate funding sources for such improvements. DDOT
41 will continue to have maintenance responsibilities of these transportation improvements.
42
43

1 **9. Record of Decision Approval**

2
3 This ROD documents the specific components of my decision and the rationale for my decision. This
4 decision is based on information and analyses contained in the St. Elizabeths Master Plan
5 Amendment 2 Draft EIS issued in June 2020; the Master Plan Amendment 2 Final EIS issued in
6 August 2020; the MOA executed in September 2020 (Appendix B); the comments from Federal and
7 state agencies, stakeholder organizations, members of the public, and elected officials; and other
8 information in the administrative record.
9

10
11
12 DocuSigned by:

13 *Darren Blue*

9/29/2020

14 A129529746E1427...
Darren Blue

Date

15 Regional Commissioner
16 Public Buildings Service
17 U.S. General Services Administration
18

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APPENDIX A
RESPONSES TO COMMENTS ON
FINAL SUPPLEMENTAL EIS

1 Two correspondences were received on the St. Elizabeths Final EIS. The Washington Metropolitan
 2 Area Transit Authority (Metro) provided comments on traffic and transit impacts of implementation of
 3 Master Plan Amendment 2, and the U.S. Environmental Protection Agency (EPA) provided
 4 recommendations for minimizing and mitigating impacts and for coordinating with low-income and
 5 minority communities in the vicinity of the West Campus. Following is a summary of the comments
 6 received, responses to those comments, and the comment letters.
 7

Comment	Response
WMATA	
<p>Metro shares the commitment to ensuring safe, convenient, and easy access between Metro facilities and the Campus. We look forward to ongoing coordination with the U.S. General Services Administration (GSA) and the Department of Homeland Security (DHS) on various elements of the Transportation Management Program, including:</p> <ul style="list-style-type: none"> • Capacity and Operational Considerations for DHS Metrorail Shuttles <p>- Ongoing coordination on long-term plans for access and service planning is necessary to implement new or altered service plans to accommodate enhanced demand and new locations.</p> <p>- As previously noted, Metro is unable to accommodate incorporation of non-Metrobus operations at either the Congress Heights or Anacostia Metrorail stations without further infrastructure improvements.</p> <p>- To ensure any selected DHS shuttle routes that connect the campus and Metrorail be convenient and direct, including the route itself and stop placement, we would encourage discussions on possible shuttle stop improvements at Gate 1 and Gate 2.</p>	<p>GSA and DHS look forward to continuing coordination with Metro on ways to best serve development on the St. Elizabeths West Campus including access and service plans. GSA understands that WMATA cannot incorporate non-Metrobus operations at either the Congress Heights or Anacostia Metrorail stations without further infrastructure improvements. GSA will also continue to assess the need for possible shuttle stop improvements at Gate 1 and Gate 2.</p>

Comment	Response
<p>Traffic and Pedestrian Impacts on Metrobus and DHS shuttle Operations</p> <ul style="list-style-type: none"> - Development of the West Campus will have impacts on area roadways, particularly Howard Road SE and Martin Luther King Jr Avenue SE, which could negatively affect the performance of both Metrobus and DHS shuttle operations. The proposed increase in parking capacity at the campus could add additional traffic flow. - Full implications of any East Campus developments would need to be understood in coordination with the West Campus plans to better understand and determine cumulative impacts on road traffic and transit performance. - Improved pedestrian/bicycle connectivity and facilities between the East and West Campuses (Redwood Street underpass connection) and to the adjacent Metro stations could further help to minimize potential transit and shuttle service disruptions on area roads and improve the customer experience. 	<p>GSA concurs that development of the West Campus will have impacts on area roadways as described in the Master Plan Amendment 2 Final EIS and has proposed mitigation measures to offset these impacts.</p> <p>Traffic that will be generated by the District of Columbia's development of the St. Elizabeths East Campus is included in the future baseline traffic analysis and the cumulative traffic impacts in the Master Plan Amendment 2 Final EIS.</p> <p>While GSA and DHS understand the desire for improved pedestrian/bicycle connectivity and facilities between the East and West Campuses, GSA and DHS must take security requirements into consideration when establishing entrances to the campus. GSA and DHS will continue to assess the potential for such connections in the future.</p>
<p>We request that GSA, DHS and other relevant federal partners work with Metro's Office of Planning and Office of Bus Planning and Scheduling on future planning and implementation efforts to ensure the smooth integration of services and efficient transit operations between St. Elizabeth's West Campus and the Anacostia and Congress Heights Metrorail stations.</p>	<p>GSA and DHS look forward to working with Metro's Office of Planning and Office of Bus Planning and Scheduling as the West Campus project advances.</p>

Comment	Response
U.S. Environmental Protection Agency	
<p>We appreciate that GSA’s intention is to work with the design teams and the Consulting Parties to identify ways to avoid and minimize impacts to cultural resources. We would note that the SEIS and response to comments state that the final executed Memorandum of Agreement (MOA) is included in Appendix F of the SEIS. However, the Draft MOA is contained in Appendix F, not the Final, which appears to indicate that consultation is not finalized. As indicated in our July letter, given St. Elizabeths designation as an NHL, we recommend that GSA continue to work with the Consulting Parties and other applicable agencies to minimize and mitigate adverse impacts to nationally important resources, including the creation of development plans that incorporate and complement historic components of the site to protect the historic value of the site and integrity of the NHL.</p>	<p>The Final fully executed MOA is included as an attachment to the Record of Decision. As noted, GSA will continue to coordinate with consulting parties as the implementation of the Master Plan for the West Campus progresses.</p>
<p>We understand from the response that GSA is cognizant of the environmental justice issues in the surrounding community and that GSA has coordinated with the surrounding community. As we previously noted, several EJSCREEN environmental justice (EJ) indices indicate that the communities in the area may face higher existing environmental stressors than much of the national population. We suggest GSA continue to conduct community outreach, engagement and mitigation as appropriate.</p> <p>We recommend the ROD include commitment to EJ issues and measures that will be taken to engage and mitigate impacts to the community. We recommend that the ROD and/or construction plans include specific potential minimization and/or mitigation measures for construction-related impacts on the surrounding communities, including air quality monitoring (as added in Section 4.5), as well as other designs and controls for emissions, demolition, waste removal, and transportation.</p>	<p>Comment Noted.</p>

Comment	Response
<p>We recommend that the ROD include a commitment to use an environmental monitor to inspect construction practices, identify and resolve construction issues in a timely manner, and verify that permit conditions are met. Further, given the potential for failure of erosion and sediment controls on steep slopes, we suggest a commitment to select a contractor that is experienced with maintaining controls in these settings.</p>	<p>Comment noted.</p>
<p>Thank you for indicating that environmental site assessments will be conducted prior to site work and building demolition in compliance with the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), and the National Emission Standards for Hazardous Air Pollutants (NESHAP). We recommend that remedial actions include an adaptive management plan and a hazard communication plan and that the construction plans specify engineering controls to prevent the offsite migration of chemicals during construction and demolition. (Such measures would include dust suppression during activities that may disturb fly ash.)</p>	<p>Comment noted.</p>
<p>EPA appreciates that GSA has provided additional requirements to mitigate construction traffic on page 4-88. Given the identification of specific intersection-related impacts in both the DSEIS and FSEIS (specifically, at respective intersections of Martin Luther King Jr. Avenue SE and Malcolm X Avenue SE, Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place SE, and Suitland Parkway and I-295 SB), EPA continues to recommend a construction schedule for roadway improvements to ensure adequate mitigation of these significant impacts.</p>	<p>Comment noted.</p>

Comment	Response
<p>The SEIS indicates GSA’s Integrated Pest Management Program would be established to determine controls for the use of fertilizers, herbicides, and other chemicals used for landscaping. To reduce potential impacts to surface waters from pesticide and fertilizer applications, we support this effort and recommend that integrated pest management be incorporated into landscape and/or campus maintenance plans.</p>	<p>Comment noted.</p>

1
2



September 28, 2020

Mr. Paul Gyamfi
Senior NEPA Compliance Specialist
U.S. General Services Administration, National Capital Region
1800 F Street, NW
Room 4400
Washington, DC 20407

RE: Final Supplemental Environmental Impact Statement (EIS) at St. Elizabeth's West Campus

Dear Mr. Gyamfi:

Thank you for the opportunity to comment on the Final Supplemental Environmental Impact Statement (EIS) at St. Elizabeth's West Campus.

Metro shares the commitment to ensuring safe, convenient, and easy access between Metro facilities and the Campus. We look forward to ongoing coordination with the U.S. General Services Administration (GSA) and the Department of Homeland Security (DHS) on various elements of the Transportation Management Program, including:

- Capacity and Operational Considerations for DHS Metrorail Shuttles
 - Ongoing coordination on long-term plans for access and service planning is necessary to implement new or altered service plans to accommodate enhanced demand and new locations.
 - As previously noted, Metro is unable to accommodate incorporation of non-Metrobus operations at either the Congress Heights or Anacostia Metrorail stations without further infrastructure improvements.
 - To ensure any selected DHS shuttle routes that connect the campus and Metrorail be convenient and direct, including the route itself and stop placement, we would encourage discussions on possible shuttle stop improvements at Gate 1 and Gate 2.

**Washington
Metropolitan Area
Transit Authority**

600 Fifth Street, NW
Washington, D.C. 20001
202/962-1234

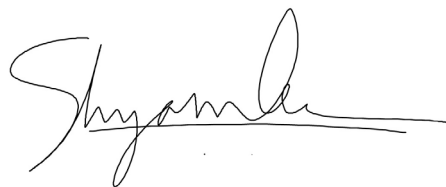
*By Metrorail:
Judiciary Square-Red Line
Gallery Place-Chinatown
Red, Green and
Yellow Lines*

*A District of Columbia
Maryland and Virginia
Transit Partnership*

- Traffic and Pedestrian Impacts on Metrobus and DHS shuttle Operations
 - Development of the West Campus will have impacts on area roadways, particularly Howard Road SE and Martin Luther King Jr Avenue SE, which could negatively affect the performance of both Metrobus and DHS shuttle operations. The proposed increase in parking capacity at the campus could add additional traffic flow.
 - Full implications of any East Campus developments would need to be understood in coordination with the West Campus plans to better understand and determine cumulative impacts on road traffic and transit performance.
 - Improved pedestrian/bicycle connectivity and facilities between the East and West Campuses (Redwood Street underpass connection) and to the adjacent Metro stations could further help to minimize potential transit and shuttle service disruptions on area roads and improve the customer experience.

We request that GSA, DHS and other relevant federal partners work with Metro's Office of Planning and Office of Bus Planning and Scheduling on future planning and implementation efforts to ensure the smooth integration of services and efficient transit operations between St. Elizabeth's West Campus and the Anacostia and Congress Heights Metrorail stations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shyam Kannan', with a long horizontal line extending to the right.

Shyam Kannan
Vice President
Office of Planning



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

September 25, 2020

Mr. Paul Gyamfi
Office of Planning and Design Quality
Public Buildings Service – National Capital Region
U.S. General Services Administration
1800 F Street, NW, Room 4400
Washington, DC 20407

Re: Supplemental Environmental Impact Statement Department of Homeland Security Headquarters Consolidation at St. Elizabeths Master Plan Amendment 2, Washington, D.C.; CEQ #20200173

Dear Mr. Gyamfi:

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 (EPA) has reviewed the Final Supplemental Environmental Impact Statement (SEIS or Study) for the Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan Amendment 2.

The U.S. General Services Administration (GSA) has prepared the SEIS to re-evaluate development on the St. Elizabeths West Campus. As detailed in the Study, St. Elizabeths is designated as a National Historic Landmark (NHL), and the original 2008 Master Plan for DHS included the development on the West and East Campuses. Master Plan Amendment 1 in 2012 specified the development on the East Campus to house the Federal Emergency Management Agency. EPA submitted comment letters on the Draft (2007) and Final EISs (2008) and Supplemental EISs in 2011 and 2012.

The current proposal eliminates development on the East Campus and re-evaluates development on the West Campus. The No Action alternative would include development of the West Campus as described in the approved 2008 Master Plan. However, the preferred alternative has been identified as Alternative B. Alternative B would include demolishing five buildings (Buildings 60, 66, 67, 68, and 69) and constructing two buildings on the plateau area and demolishing one building (Building 15) and constructing 175,000 gsf of office space on the Sweetgum Lane site. EPA had submitted comments on the Draft SEIS in a letter dated July 16, 2020.

Thank you for providing a response to our comments in Appendix H and for the updates incorporated in Section 4.2.2 and in Sections 4.5, 4.6, and 4.7 of the SEIS, including the additional mitigation measures described in 4.5 and 4.7. Please find recommendations for the Record of Decision (ROD) and the next steps in the development of projects at the facility, including planning and construction:

- We appreciate that GSA's intention is to work with the design teams and the Consulting Parties to identify ways to avoid and minimize impacts to cultural resources. We would note that the SEIS and response to comments state that the final executed Memorandum of Agreement (MOA) is included in Appendix F of the SEIS. However, the Draft MOA is contained in Appendix F, not the Final, which appears to indicate that consultation is not finalized. As indicated in our July letter, given St. Elizabeths designation as an NHL, we recommend that GSA continue to work with the Consulting Parties and other applicable agencies to minimize and mitigate adverse impacts to nationally important resources, including the creation of development plans that incorporate and complement historic components of the site to protect the historic value of the site and integrity of the NHL.
- We understand from the response that GSA is cognizant of the environmental justice issues in the surrounding community and that GSA has coordinated with the surrounding community. As we previously noted, several EJSCREEN environmental justice (EJ) indices indicate that the communities in the area may face higher existing environmental stressors than much of the national population. We suggest GSA continue to conduct community outreach, engagement and mitigation as appropriate.
- We recommend the ROD include commitment to EJ issues and measures that will be taken to engage and mitigate impacts to the community. We recommend that the ROD and/or construction plans include specific potential minimization and/or mitigation measures for construction-related impacts on the surrounding communities, including air quality monitoring (as added in Section 4.5), as well as other designs and controls for emissions, demolition, waste removal, and transportation.
- We recommend that the ROD include a commitment to use an environmental monitor to inspect construction practices, identify and resolve construction issues in a timely manner, and verify that permit conditions are met. Further, given the potential for failure of erosion and sediment controls on steep slopes, we suggest a commitment to select a contractor that is experienced with maintaining controls in these settings.
- Thank you for indicating that environmental site assessments will be conducted prior to site work and building demolition in compliance with the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), and the National Emission Standards for Hazardous Air Pollutants (NESHAP). We recommend that remedial actions include an adaptive management plan and a hazard communication plan and that the construction plans specify engineering controls to prevent the offsite migration of chemicals during construction and demolition. (Such measures would include dust suppression during activities that may disturb fly ash.)
- EPA appreciates that GSA has provided additional requirements to mitigate construction traffic on page 4-88. Given the identification of specific intersection-related impacts in both the DSEIS and FSEIS (specifically, at respective intersections of Martin Luther King Jr. Avenue SE and Malcolm X Avenue SE, Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place SE, and Suitland Parkway and I-295 SB), EPA continues to recommend a construction schedule for roadway improvements to ensure adequate mitigation of these significant impacts.

- The SEIS indicates GSA's Integrated Pest Management Program would be established to determine controls for the use of fertilizers, herbicides, and other chemicals used for landscaping. To reduce potential impacts to surface waters from pesticide and fertilizer applications, we support this effort and recommend that integrated pest management be incorporated into landscape and/or campus maintenance plans.

Thank you for providing EPA with the opportunity to review this project. Please send us a copy of the Record of Decision when it is completed. If you have any questions, please contact me or Carrie Traver. I can be reached at 215-814-3322 or rudnick.barbara@epa.gov; Ms. Traver can be reached at 215-814-2772 or traver.carrie@epa.gov.

Sincerely,



Barbara Rudnick
NEPA Program Coordinator
Office of Communities, Tribes & Environmental
Assessment

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APPENDIX B

MASTER PLAN AMENDMENT 2
MEMORANDUM OF AGREEMENT

1
2
3 **MEMORANDUM OF AGREEMENT AMONG**
4 **THE UNITED STATES GENERAL SERVICES ADMINISTRATION,**
5 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,**
6 **THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,**
7 **THE UNITED STATES FEDERAL HIGHWAY ADMINISTRATION,**
8 **THE NATIONAL CAPITAL PLANNING COMMISSION,**
9 **AND**
10 **THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY,**
11 **REGARDING A**
12 **SECOND AMENDMENT TO THE MASTER PLAN FOR THE REDEVELOPMENT OF THE ST. ELIZABETHS**
13 **WEST CAMPUS AND ASSOCIATED CONSTRUCTION**
14 **AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,**
WASHINGTON, D.C.

15 WHEREAS, this Memorandum of Agreement (“MOA”) is made as of this 25 day of September, 2020,
16 by and among the United States General Services Administration (“GSA”) as lead federal agency, the
17 Advisory Council on Historic Preservation (“ACHP”), the District of Columbia State Historic Preservation
18 Office (“DCSHPO”), the United States Federal Highway Administration (“FHWA”), the National Capital
19 Planning Commission (“NCPC”), and the United States Department of Homeland Security (“DHS”) (all
20 referred to collectively herein as the “Signatories” or individually as a “Signatory” pursuant to Sections
21 106 and 110 of the National Historic Preservation Act (“NHPA”), 16 U.S.C. §§ 470f and 470h-2(f), the
22 Section 106 implementing regulations at 36 CFR Part 800, and the 2008 Programmatic Agreement (“PA”)
23 among GSA, ACHP, DCSHPO, FHWA (“Federal Highway Administration”), NCPC, and DHS regarding the
24 Redevelopment of St. Elizabeths National Historic Landmark, Washington, D.C., dated December 9,
25 2008, and amended June 4, 2018, which contemplated a multi-phased Redevelopment Project
26 (“Redevelopment Project”) and the execution of one or several separate MOAs to develop and
27 implement the project per 36 CFR § 800.6 (Exhibit 1); and

28 WHEREAS, St. Elizabeths (“St. Elizabeths”) is located in the Southeast quadrant of Washington, D.C. and
29 consists of the 176-acre West Campus (“West Campus”) and the 173-acre East Campus (“East Campus”)
30 divided by Martin Luther King, Jr., Avenue, SE (“MLK Avenue”), all of which contribute to the St.
31 Elizabeths National Historic Landmark (NHL) (Exhibit 2). The West Campus is under GSA’s jurisdiction
32 and is being redeveloped by GSA for occupancy by DHS. The East Campus and MLK Avenue are under
33 the jurisdiction of the Government of the District of Columbia (“D.C. Government”); and

34 WHEREAS, GSA’s ongoing redevelopment of the West Campus has occurred in accordance with *The DHS*
35 *Headquarters Consolidation at St. Elizabeths Final Master Plan, Washington, DC, November 10, 2008*
36 (“2008 Master Plan”) as documented in the PA, and the subsequent *DHS Consolidation at St. Elizabeths*
37 *Master Plan Amendment: Federal Use Parcel of the East Campus, Washington, DC, March 30, 2012*
38 (“Master Plan Amendment”); and

39 WHEREAS, the adverse effects of the Master Plan Amendment were accounted for in *The Memorandum*
40 *of Agreement among the United States General Services Administration, the Advisory Council on Historic*
41 *Preservation, the Government of the District of Columbia acting by and through the Deputy Mayor for*
42 *Planning and Economic Development, the District of Columbia Office of Planning, the District of Columbia*
43 *Department of Transportation, the District of Columbia State Historic Preservation Office, the National*

44 *Capital Planning Commission, and the United States Department of Homeland Security Regarding*
45 *Transportation Improvements along a Segment of Martin Luther King, Jr. Avenue and Construction of the*
46 *Federal Emergency Management Agency Headquarters within the Federal Use Parcel on the East*
47 *Campus of St. Elizabeths National Historic Landmark, Washington, D.C. ("2012 MOA"), executed on April*
48 *19, 2012; and*

49 WHEREAS, on August 19, 2020, GSA notified the Signatories and Consulting Parties ("Consulting Parties")
50 to the 2012 MOA that it was vacating the MOA because the undertaking proposed therein was not
51 carried out and is not intended to be carried out now or in the future due to changed circumstances
52 (Exhibit 3); and

53 WHEREAS, GSA plans to complete and implement the Second Amendment to the Master Plan for the
54 Redevelopment of the St. Elizabeths West Campus ("Second Amendment"), which constitutes the
55 undertaking ("Undertaking") and which will be attached herein without amendment of this MOA
56 following approval by NCPC and acceptance by GSA (Exhibit 4); and

57 WHEREAS, the Undertaking, the Second Amendment, mainly will affect two areas of the West Campus:
58 the Plateau ("Plateau") which includes Buildings 56/57, 60, 64, 66, 67, 68, and 69 and the Sweetgum
59 Lane site ("Sweetgum Lane Site") which includes Building 15. Both areas encompass landscape features
60 that contribute to the NHL, including the Ravine and the Athletic Field, as well as spatial organization
61 and land use patterns, topography and drainage, circulation, views and visual relationships, landscape
62 structures, constructed water features, and small-scale furnishings and objects; and

63 WHEREAS, the Undertaking includes design and construction of two new office buildings on the Plateau;
64 design and construction of one new building at the Sweetgum Lane site; landscape and site work at the
65 Plateau site including on the Plateau and in the Ravine; the rehabilitation of contributing Buildings
66 56/57; the continued stabilization of Buildings 64 and 52; and the associated demolition of 6 buildings
67 that contribute to the NHL: Buildings 15, 60, 66, 67, 68, and 69, upon appropriation from the U.S.
68 Congress of sufficient funding for new construction; and

69 WHEREAS, GSA committed in the 2008 Master Plan and the 2008 PA to the rehabilitation and use of the
70 historic buildings on the West Campus that contribute to the NHL, and this Undertaking, the Second
71 Amendment, does not affect that commitment with the exception of the 6 buildings to be demolished;
72 and

73 WHEREAS, GSA, during consultations leading to the MOA, committed to evaluating Building 69 to
74 determine if it was feasible to retain it for federal government office space, and GSA reaffirmed the
75 commitment to evaluate it at NCPC's commission meeting on November 7, 2019; and

76 WHEREAS, GSA determined an Area of Potential Effects ("APE")(Exhibit 5), as defined in 36 CFR §
77 800.16(d) in the 2008 PA, and during consultation for this Undertaking GSA determined the APE for this
78 Undertaking was the entire St Elizabeths NHL; and

79 WHEREAS, in consultation with DCSHPO, GSA will delineate Limits of Disturbance ("LOD") associated
80 with each Design Submission ("Design Submission") under the Second Amendment in the process
81 described in Stipulation III.C.2. of the PA; and

82 WHEREAS, NCPC will review the Second Amendment and the subsequent Design Submission
83 components of the Undertaking pursuant to the National Capital Planning Act of 1952, and has

84 designated GSA lead agency for NCPC’s compliance pursuant to 36 CFR § 800.2(a). NCPC will rely upon
85 the PA and this MOA to fulfill its Section 106 obligation for any approval action taken in its review; and

86 WHEREAS, GSA, in accordance with Stipulation III.C.1.c of the PA, consulted with NCPC, a Signatory, and
87 with the U.S. Commission of Fine Arts (“CFA”), a Consulting Party, and anticipates determining
88 appropriate submittal dates for the draft and final Second Amendment to the Master Plan and the
89 eventual phases of Design Submissions; and

90 WHEREAS, as required under 54 USC § 306107 (commonly known as Section 110(f) of the NHPA) and its
91 implementing regulations (specifically 36 CFR §§ 800.6 and 800.10), prior to the approval of any federal
92 undertaking that may directly and adversely affect an NHL, the head of the responsible federal agency
93 shall to the maximum extent possible undertake such planning and actions as may be necessary to
94 minimize harm to the NHL; in accordance with the code and its implementing regulations, GSA has
95 notified the ACHP and the U.S. Department of the Interior- National Park Service (DOI-NPS, as the
96 Secretary of the Interior’s designee) of this consultation regarding the NHL property and invited the NPS
97 to participate in the development of this MOA and to consult on the resolution of any adverse effects to
98 the NHL as a consulting party; and

99 WHEREAS, pursuant to the National Environmental Policy Act, GSA has prepared a Supplemental
100 Environmental Impact Statement (“2020 SEIS”) to address changed circumstances since the publication
101 of the *Consolidation at St. Elizabeths Master Plan Amendment – East Campus North Parcel*
102 *Environmental Impact Statement* in 2012. GSA has provided the 2020 SEIS for public comment in
103 accordance with 36 CFR § 800.8(a)(1); and

104 WHEREAS, GSA consulted with the D.C. Government to ensure the goals and objectives of the Second
105 Amendment are compatible with the District of Columbia’s *St. Elizabeths East Master Plan and Design*
106 *Guidelines* (2012); and

107 WHEREAS, in coordination with the D.C. Department of Transportation (DDOT), GSA has assessed
108 transportation needs and determined that no right-of-way improvements are necessary on MLK Avenue
109 at this time for the implementation of the Second Amendment; and

110 WHEREAS, GSA initiated consultation with the federally recognized Delaware Tribe, which has historic
111 ties to the area that includes the St. Elizabeths West Campus, provided notification of GSA’s
112 determination of adverse effects, invited the tribe to participate in consultation, and the Tribe did not
113 reply; and

114 WHEREAS, pursuant to 36 CFR 800.3(f), in addition to the Signatories to this MOA, GSA identified and
115 invited to consult the following Consulting Parties: Advisory Neighborhood Commissions 8A, 8B, 8C, 8D,
116 and 8E, CFA, The Committee of 100 on the Federal City, The Cultural Landscape Foundation, the D.C.
117 Preservation League, the D.C. Office of Planning, DDOT, the National Trust for Historic Preservation, the
118 U.S. Department of the Interior- National Park Service, and the U.S. Navy; and

119 WHEREAS, in consultation, GSA applied the Criteria of Adverse Effects (36 CFR 800.5(a)(1)) and
120 determined that the Undertaking will have an adverse effect on the NHL due to the anticipated
121 demolition of 6 contributing buildings; the proposed construction of new buildings with different
122 locations, larger footprints, and significantly more mass than those proposed in the 2008 Master Plan;
123 the alteration or demolition, during landscape and site work, of historic landscape features such as
124 topography, circulation patterns, and vegetation; and the anticipated changes to the integrity of the

125 visual environment of the NHL. In addition, there is an intensification of the adverse effect previously
126 determined in the PA on the adjacent eligible Congress Heights Historic District due to anticipated
127 changes to the integrity of views from the historic district toward the proposed new buildings on the
128 Plateau; and

129 WHEREAS, GSA completed archaeological assessments of the sites constituting the area of the Second
130 Amendment and determined there is no known potential for adverse effect to archaeological resources,
131 and that in the event of an unanticipated discovery, Exhibit 14 of the PA stipulates the procedures for
132 notification and site treatment; and

133 WHEREAS, GSA notified the DCSHPO and ACHP of its adverse effect determination for this Undertaking,
134 and continued its ongoing consultation with the Signatories and Consulting Parties to avoid, minimize, or
135 mitigate adverse effects in accordance with the PA; and

136 WHEREAS, this consultation led to the Second Amendment to the Master Plan appended to this MOA,
137 and, pursuant to Stipulation III.C.1 of the PA, will continue consultation with the Signatories and
138 Consulting Parties during development of Design Submissions as described herein. Consultation is also
139 informed by the Governing Documents as defined in Stipulation 1.a. herein and the Historic Structure
140 Reports; and

141 WHEREAS, GSA informed the Signatories and Consulting Parties during consultation that GSA will
142 continue to make consultation and non-sensitive Undertaking-related documents accessible to the
143 public through a project website at http://www.stelizabethsdevelopment.com/document_center.cfm

144 NOW THEREFORE, the Signatories agree that the Undertaking will be implemented in accordance with
145 the following Stipulations (“Stipulations”) in order to take into account the effect of the Undertaking on
146 historic properties.

147 **STIPULATIONS**

148 GSA will ensure the following measures are carried out:

149 I. GENERAL REQUIREMENTS

150 a. Reference Documents and Documentation

151 The Second Amendment provides, at the Master Plan level, GSA’s proposed massing, height,
152 and scale for new agency buildings; landscape and site work; and rehabilitation and/or
153 stabilization of historic buildings.

154 GSA’s Design Submissions will be based on the Second Amendment, the Secretary of the
155 Interior’s Standards for the Treatment of Historic Properties (Rehabilitation), NPS
156 Preservation Brief 31, the campus Cultural Landscape Report, the Landscape Preservation
157 Plan, the Landscape Integration Plan, and the Architectural Resources Management Plan, all
158 specific to the redevelopment of the St. Elizabeths West Campus. The Undertaking will also
159 be carried out in accordance with the 2020 SEIS. Collectively, these documents will be
160 referred to as governing documents (“Governing Documents”); and GSA also will comply
161 with applicable Building and Life Safety Codes.

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b. Qualified Personnel

GSA will ensure that all historic preservation and archaeological work, if an unanticipated discovery is made, performed by GSA or on its behalf pursuant to this MOA, will be accomplished by or under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary of the Interior’s Professional Standards located at http://www.nps.gov/history/local-law/arch_stnds_9.htm.

II. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

GSA consulted with Signatories and Consulting Parties to determine the effects caused by the Second Amendment and measures to avoid, minimize, or mitigate them. GSA will take the following specific actions:

a. Avoidance Measures

GSA, pursuant to the protection measures stipulated in the PA, will ensure that the measures, including vibration monitoring and the physical and marked separation of new construction from adjacent historic buildings, are in place.

b. Minimization Measures

GSA, pursuant to the stipulations in the PA, will ensure that effects to historic landscape features and trees are avoided or minimized during construction. During consultation on the development of the Design Submissions, GSA will continue to seek ways to minimize adverse effects caused by the Second Amendment, and will take the following actions:

1. Retain the historic pedestrian pathways to the extent possible.
2. Design any new hardscape around new buildings in a manner that respects the NHL’s historic landscape character in order to minimize the adverse effect to the landscape setting.
3. Augment the wooded buffer between the cemetery and the new building on the Sweetgum Lane site to avoid or minimize the potential effect on views from the cemetery toward the Sweetgum Lane site.
4. Install a green roof on the new building at the Sweetgum Lane site to minimize effects on views across the site.
5. Design the Plateau buildings to respond to views from within the West Campus, more distant views from the west, and into the site from the St. Elizabeths East Campus of the NHL along Redwood Street and Gate 3.
6. Follow the procedures set out in Exhibit 14 of the PA if unanticipated archaeological discoveries occur.
7. Inspect and reinforce current protective mothballing measures and make necessary repairs to historic buildings, in consultation with DCSHPO.

198 c. Mitigation Measures

199 GSA will take the following actions to mitigate adverse effects associated with this Second
200 Amendment:

- 201 1. Conduct additional documentation, including digital documentation of the interiors
202 and exteriors of Buildings 60, 66, 68, and 69 and make it available to the public
203 through an online platform.
- 204 2. Provide tags with botanical information on historic trees as defined in the Landscape
205 Preservation Plan within 5 years of the execution of this MOA, and replace historic
206 trees removed for construction with the same or similar species in a nearby location
207 as feasible and subject to guidance from GSA's Regional Horticulturalist and in
208 consultation with the DC SHPO.
- 209 3. Create an online version of materials from the 2017-2018 St. Elizabeths exhibit at
210 the National Building Museum, and add the interpretive sign program, and other
211 educational materials and documentation, within 5 years of execution of this MOA
212 and in consultation with the DCSHPO.

213 III. DESIGN REVIEW PROCESS

214 GSA will continue to follow the Consultation Process and Procedures for Design Submissions
215 stipulated under III.C. of the PA and consult with Signatories and Consulting Parties for each
216 component of this Undertaking. The components of the Second Amendment may advance
217 individually.

218 IV. ALTERATIONS TO PROJECT DOCUMENTS

219 GSA will comply with the procedures laid out in Stipulation IX.C. of the PA.

220 V. DEMOLITION AND FURTHER EVALUATION

221 GSA will not demolish buildings that contribute to the NHL, including Buildings 15, 60, 66,
222 67, 68, and 69 until the U.S. Congress appropriates sufficient funding for the construction of
223 a new building that affects that historic building and GSA notifies the Consulting Parties of
224 receipt of such funding in writing.

225 Further, for Building 69, GSA will also evaluate it to determine if it can be feasibly retained
226 and used as federal government office space, will report findings to the Consulting Parties in
227 writing, and will consider their comments on the findings. Should GSA's evaluation conclude
228 that it can be feasibly retained and used by the federal government, this MOA will remain in
229 force and a revised master plan amendment, if GSA determines it necessary, will be
230 consulted on and attached herein without further amendment of this MOA. Should GSA's
231 evaluation conclude that Building 69 cannot be feasibly retained and used by the federal
232 government, GSA will notify the Consulting Parties of its decision in writing following the
233 comment period.

234 VI. DISPUTE RESOLUTION
235 For disputes initiated by Signatories, GSA will comply with procedures in Stipulation V. of the
236 PA. For disputes initiated by Consulting Parties, GSA will comply with procedures in
237 Stipulation VI of the PA.

238 VII. AMENDMENTS
239 GSA will comply with procedures in Stipulation VII of the PA. If GSA, in consultation
240 determines that there is an intensification of the adverse effect, GSA will propose amending
241 this MOA as set forth in Stipulation VII of the PA.

242 VIII. TERMINATION
243 GSA will comply with the procedures in Stipulation VII of the PA. If this MOA is terminated,
244 the Signatories shall take such actions as are necessary to comply with all requirements of
245 36 C.F.R. Part 800.

246 IX. DURATION
247 This MOA shall remain in effect for a period of 15 years, unless extended through an
248 amendment per Stipulation VII of the PA or terminated per Stipulation VIII of the PA.

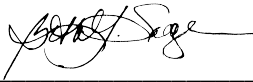
249 Availability of Funds: Per Stipulation XII.B. of the PA, fulfillment of the terms of the projects in the
250 Second Amendment and this Undertaking's MOA are subject to the availability of funds, pursuant to the
251 Anti-Deficiency Act, 31 U.S.C. § 1341 *et seq.* This MOA is not an obligation of funds in advance of an
252 appropriation of such funds, and it does not constitute authority for the expenditure of funds.

253 Execution and implementation of this MOA by the Signatories and implementation of its terms will
254 evidence that GSA, as lead agency, has afforded DC SHPO, ACHP, DOI-NPS, the Signatories and
255 Consulting Parties an opportunity to comment on the Undertaking and its effects on the St. Elizabeths
256 NHL.

257 Signatures Follow

258 MEMORANDUM OF AGREEMENT AMONG
259 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
260 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
261 THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
262 THE UNITED STATES FEDERAL HIGHWAY ADMINISTRATION,
263 THE NATIONAL CAPITAL PLANNING COMMISSION,
264 AND
265 THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY,
266 REGARDING A
267 SECOND AMENDMENT TO THE MASTER PLAN FOR THE REDEVELOPMENT OF THE ST. ELIZABETHS WEST
268 CAMPUS AND ASSOCIATED CONSTRUCTION
269 AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
270 WASHINGTON, D.C.

271 UNITED STATES GENERAL SERVICES ADMINISTRATION



August 26, 2020

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By:

Date:

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Beth L. Savage

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Director, Center for Historic Buildings

276

Federal Preservation Officer

277 MEMORANDUM OF AGREEMENT AMONG
 278 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
 279 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
 280 THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
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 287 CAMPUS AND ASSOCIATED CONSTRUCTION
 288 AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
 289 WASHINGTON, D.C.

290 UNITED STATES GENERAL SERVICES ADMINISTRATION

DocuSigned by:

 A129529746E1427...

8/27/2020

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By:

Date:

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Darren J. Blue

294

Regional Commissioner

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Public Buildings Service

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National Capital Region

297 MEMORANDUM OF AGREEMENT AMONG
298 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
299 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
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307 CAMPUS AND ASSOCIATED CONSTRUCTION
308 AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
309 WASHINGTON, D.C.

310 ADVISORY COUNCIL ON HISTORIC PRESERVATION



311 _____ 9/25/2020
312 By: Date:
313 John M. Fowler
314 Executive Director
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MEMORANDUM OF AGREEMENT AMONG
THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
THE UNITED STATES FEDERAL HIGHWAY ADMINISTRATION,
THE NATIONAL CAPITAL PLANNING COMMISSION,
AND
THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY,
REGARDING A
SECOND AMENDMENT TO THE MASTER PLAN FOR THE REDEVELOPMENT OF THE ST. ELIZABETHS WEST
CAMPUS AND ASSOCIATED CONSTRUCTION
AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
WASHINGTON, D.C.

329 DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE

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By:  _____ Date: 9/2/2020

David Maloney
State Historic Preservation Officer

335 MEMORANDUM OF AGREEMENT AMONG
336 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
337 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
338 THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
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341 AND
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344 SECOND AMENDMENT TO THE MASTER PLAN FOR THE REDEVELOPMENT OF THE ST. ELIZABETHS WEST
345 CAMPUS AND ASSOCIATED CONSTRUCTION
346 AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
347 WASHINGTON, D.C.


348 THE UNITED STATES DEPARTMENT OF TRANSPORTATION
349 FEDERAL HIGHWAY ADMINISTRATION

MONIQUE REDWINE EVANS  Digitally signed by MONIQUE REDWINE EVANS
Date: 2020.09.14 10:26:23 -04'00'

350 _____
351 By: Monique R. Evans Date:
352 Division Director, Eastern Federal Lands Highway Division
353
354

355 MEMORANDUM OF AGREEMENT AMONG
356 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
357 THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
358 THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
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366 AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,
367 WASHINGTON, D.C.

368 NATIONAL CAPITAL PLANNING COMMISSION

369  9/9/2020
370 By: _____ Date:
371 Marcel C. Acosta
372 Executive Director
373

374 MEMORANDUM OF AGREEMENT AMONG
375 THE UNITED STATES GENERAL SERVICES ADMINISTRATION,
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386 WASHINGTON, D.C.

387 UNITED STATES DEPARTMENT OF HOMELAND SECURITY

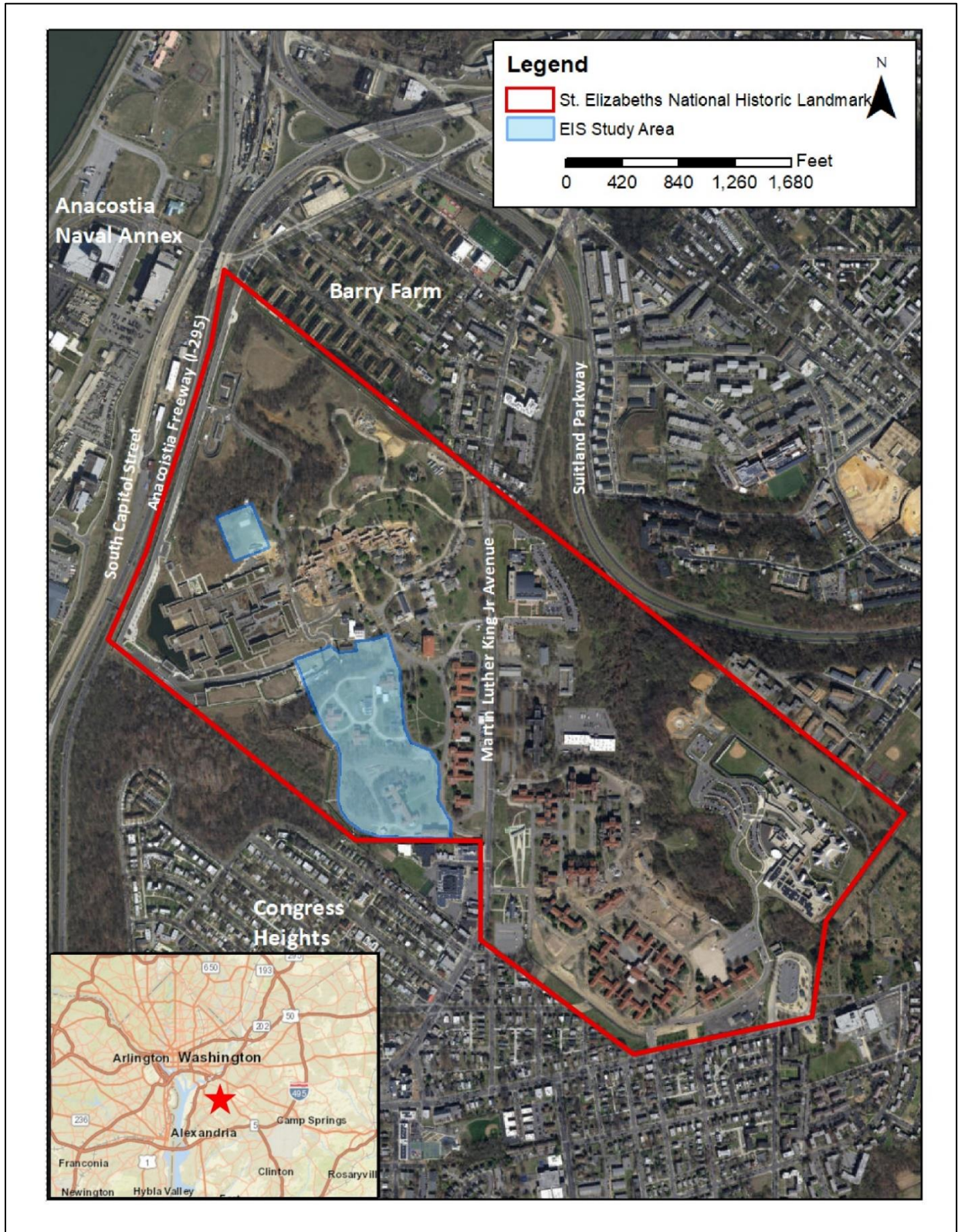
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389 By: _____ Date: _____
390 Thomas D. Chaleki
391 Chief Readiness Support Officer

392 Exhibit 1: 2008 Programmatic Agreement (found on project website):

393 http://assets.stelizabethsdevelopment.com/documents/document_center/St.Es_ProgAgreement_Final
394 [812091_20100419161713.pdf](http://assets.stelizabethsdevelopment.com/documents/document_center/St.Es_ProgAgreement_Final_812091_20100419161713.pdf)

395 Exhibit 2: St. Elizabeths National Historic Landmark. The EIS Study Area (shaded blue) defines the
396 boundaries of the Second Amendment, defined as the Undertaking and the subject of this MOA.



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U.S. General Services Administration

The U.S. General Services Administration (GSA) is notifying you as a signatory/consulting party to this agreement that we are vacating the “Memorandum of Agreement for Transportation Improvements along a Segment of Martin Luther King, Jr. Avenue and Construction of the Federal Emergency Management Agency Headquarters within the Federal Use Parcel on the East Campus of St. Elizabeth’s National Historic Landmark, Washington, D.C.,” that was executed on April 19, 2012. Neither GSA nor any other party carried out any work under these stipulations or otherwise took any action to implement this Memorandum of Agreement (MOA). GSA did not initiate the undertaking proposed in the MOA. Therefore, effective immediately, GSA no longer has any Section 106 responsibility for this MOA’s undertaking.

This constitutes GSA’s written notice to all consulting parties of GSA’s decision to vacate the MOA. As of the date of this notice, this MOA is no longer in effect. Please contact Nancy Witherell at 202-251-4901 or nancy.witherell@gsa.gov for further information.

UNITED STATES GENERAL SERVICES ADMINISTRATION

August 17, 2020

By:

Date

Beth L. Savage
Director, Center for Historic Buildings
Federal Preservation Officer

DocuSigned by:

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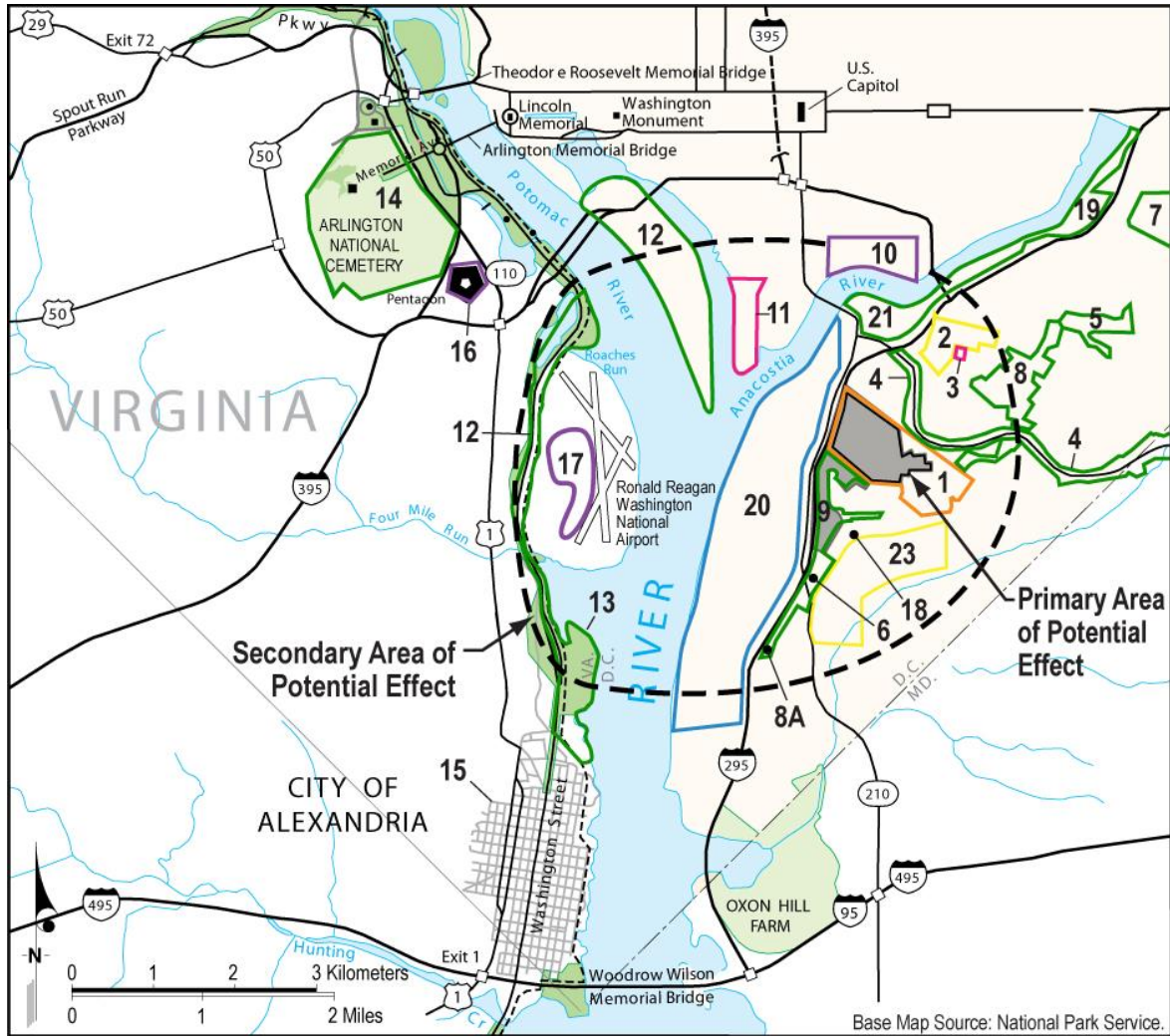
8/18/2020

By:

Date

Darren J. Blue
Regional Commissioner
Public Buildings Service
National Capital Region

401 Exhibit 4: Final Approved Master Plan Second Amendment, to be added to this MOA without
402 amendment following final approval by NCPC and acceptance by GSA.



Historic Resources and Areas of Potential Effect

National Register Listed

- 1 St. Elizabeths NHL
- 2 Anacostia Historic District
- 3 Frederick Douglass National Historic Site (Cedar Hill)
- 4 Suitland Parkway
- Civil War Fort Sites and Fort Circle Park System**
- 5 Battery Ricketts
- 6 Fort Carroll
- 7 Fort Dupont
- 8 Fort Stanton
- 8A Fort Greble
- 9 Shepherd Parkway
- 10 Washington Navy Yard
Commandant's Office
Quarters A and Quarters B
Main Gate
Washington Navy Yard Annex Historic District

- 11 Fort McNair
Army War College
- 12 East Potomac Park
- 13 George Washington Memorial Parkway
- 14 Arlington Cemetery, Custis Lee Mansion
- 15 City of Alexandria Historic District
- 16 Pentagon
- 17 Ronald Reagan Washington National Airport
- 18 Congress Heights Firehouse
- National Register Eligible**
- 19 Anacostia Freeway
- 20 Bolling Air Force Base/Naval Annex
- 21 Anacostia Park
- 22 Congress Heights Historic District

(Color outlines are for clarity only.)