

Department of Homeland Security Headquarters



at St. Elizabeths

SECTION 3

The Proposed Action and  
Alternatives



### 3. The Proposed Action and Alternatives

This Master Plan Amendment EIS addresses the following two primary elements that compose the Proposed Action:

- St. Elizabeths East Campus North Parcel site development
- Transportation improvements required for DHS consolidation.

For the first element, initial planning identified eight site development options for the North Parcel as identified in the Master Plan Amendment, three of which are carried forth for further analysis in the EIS. These three alternatives are identified as Alternative A (East West Bars), Alternative B (Campus Reflection), and Alternative C (Atrium).

#### What is a Master Plan?

A Master Plan is a document that describes, in words, drawings, diagrams, and pictures, an overall development concept, including present property uses and future land development plans. A Master Plan is guided by defined objectives and goals.

The second element is reevaluation of transportation improvements required for the DHS consolidation that were considered in the 2008 Final Master Plan EIS. Alternatives for the I-295/Malcolm X Avenue interchange and proposed West Campus Access Road, Firth Sterling Avenue/West Campus Access Road intersection, and improvements to MLK Avenue are considered as well as needed transportation improvements to support the East Campus development. Two sets of transportation improvement alternatives incorporating the aforementioned improvements are carried forth for further analysis in this EIS. These alternatives are henceforth identified as Transportation Improvement Alternatives 1 and 2 in this EIS.

As stated in **Section 2**, the Proposed Action to be assessed in this Master Plan Amendment EIS is to consolidate DHS Headquarters offices on the St. Elizabeths East Campus North Parcel to accommodate up to 750,000 gross square feet of secure office space, plus parking, and to reevaluate transportation improvements required for the consolidation of the DHS Headquarters at St. Elizabeths. This section discusses site development and transportation alternatives considered, those eliminated, and the No Action Alternative.

#### 3.1 Alternatives Development Process

To create alternatives for the proposed project, GSA assembled a project team of urban designers and planners, architects, landscape architects, architectural historians, environmental

1 scientists, engineers, transportation planners, and community and public outreach specialists.  
2 The project team identified and studied existing resources and development considerations  
3 before developing alternatives that meet the DHS mission requirements. The project team’s  
4 activities included the following:

- 5 • Reviewing the ROD for the 2008 Final Master Plan EIS (GSA 2008b)
- 6 • Reviewing the NHPA Programmatic Agreement for the DHS Headquarters  
7 consolidation, executed December 8, 2008 (GSA 2008c)
- 8 • Reviewing the District’s *St. Elizabeths East Redevelopment Framework Plan*, and the MOA  
9 signed November 23, 2008 (and extended until May 23, 2010) between DMPED, GSA,  
10 and DHS (DMPED 2008, DCOP 2008)
- 11 • Reviewing the St. Elizabeths NHL nomination to understand the significance of the  
12 cultural resources on the North Parcel
- 13 • Reviewing the St. Elizabeths Historic Resources Management Plan (Devroux & Purnell  
14 Architects 1993)
- 15 • Mapping the most significant contributing resources on the North Parcel and in the  
16 transportation corridors being reevaluated in this EIS to avoid adverse effects on those  
17 resources whenever possible
- 18 • Assessing cultural landscapes on the North Parcel and the transportation corridors
- 19 • Assessing the potential for archaeological resources on the North Parcel and the  
20 transportation corridors
- 21 • Identifying the historic and current significant views both to and from the North Parcel  
22 and the transportation corridors
- 23 • Identifying natural resources such as forested areas, streams, and protected species
- 24 • Identifying site constraints such as steep slopes and unstable soils
- 25 • Reviewing regional traffic modeling efforts being conducted by DDOT as part of the St.  
26 Elizabeths Transportation Study (see **Section 3.1.1**), and analyzing traffic impacts on  
27 local and regional roadways
- 28 • Assessing the condition and availability of utilities onsite and offsite
- 29 • Identifying “no-build” areas on the North Parcel and in the transportation corridors to  
30 preserve landscape, archaeological sites, building resources, and views

- 1 • Identifying locations on the North Parcel and in the transportation corridors for new  
2 construction that would limit effects on landscape, buildings, archaeological sites, and  
3 views.

4 As GSA developed the alternatives, it worked to find a balance between the Master Plan goals,  
5 DHS mission requirements, the District of Columbia's redevelopment goals for the East  
6 Campus, and the individual resources that could be affected by the project. Throughout the  
7 study process and the development of alternatives, GSA asked for input from public and  
8 government agencies through scoping, stakeholder meetings, public meetings with Advisory  
9 Neighborhood Commissions (ANCs) and the general public, and Consulting Parties meetings  
10 under the Section 106 process.

11 Eight site development concepts were initially considered for the 32-acre North Parcel Study  
12 Area. Of these eight concepts, three alternatives were developed and brought forward for  
13 detailed analysis in this EIS (see **Section 3.4.1**). After extensive coordination with the District  
14 of Columbia, each of the three alternatives is currently on a site on the North Parcel that is  
15 approximately 11.8 acres in size. In addition, alternatives for transportation improvements  
16 required for the DHS consolidation that were considered in the 2008 Final Master Plan EIS are  
17 reevaluated in this EIS (see **Section 3.4.2**).

### 18 **3.1.1 St. Elizabeths Transportation Study**

19 DDOT, FHWA, and GSA have collaborated on a transportation study that evaluates  
20 transportation impacts from the DHS consolidation at St. Elizabeths and other nearby area  
21 existing and proposed developments, including the District of Columbia's St. Elizabeths East  
22 Campus Development, Poplar Point, Barry Farm, and Joint Base Anacostia-Bolling. This study  
23 includes the evaluation of potential transportation and transit alternatives to support the planned  
24 developments. GSA is using this study to identify potential transportation alternatives for  
25 detailed analysis in this Master Plan Amendment EIS. The report produced for this study is  
26 identified as the *Department of Homeland Security Headquarters at St. Elizabeths EIS Transportation*  
27 *Impact Analysis for St. Elizabeths Campus and Surrounding Vicinity Transportation Technical Report*,  
28 hereafter referred to as the St. Elizabeths Transportation Technical Report (TTR), and is  
29 provided in **Appendix C**.

### 30 **3.1.2 Site Considerations**

31 As noted in the previous sections, research was conducted to identify issues and resources to be  
32 considered in the development of alternatives. A summary of the key issues that were  
33 considered in the development of the individual action alternatives follows.

1 **3.1.2.1 National Historic Landmark Status**

2 As noted in **Section 2**, the St. Elizabeths Hospital is an NHL. The NHL designation covers 82  
3 contributing resources on the East and West Campuses, including buildings, landscapes, vistas  
4 of the river and city, and the West Campus Cemetery. Since redevelopment of the St. Elizabeths  
5 Campus would affect an NHL, Section 110(f) of the NHPA applies to the project. Of the  
6 39 existing buildings on the East Campus, 27 are contributing to the NHL. The Horse Barn  
7 (Building 83), Dry Barn (Building 82), Scalehouse, and Staff Residences (Cottages) 8 and 9  
8 (Buildings 79 and 86) are contributing buildings within the North Parcel Study Area, and  
9 Blackburn Laboratory (Building 88), R Building (Building 89), Smith Center (Building 90), and  
10 Glenside (Building 91) are contributing buildings adjacent to the study area to the south. A  
11 Garage/Motor pool (Building 81), Dix Pavilion (Building 120), and Veterans Shelter (Building  
12 81A) do not contribute to the NHL.

13 Section 110 requires the head of the responsible Federal agency to “undertake such planning and  
14 actions as may be necessary to minimize harm” to an NHL to the “maximum extent possible.”  
15 The goal of preservation under Section 110 (16 U.S.C. § 470h-2(a)) is to conduct responsible  
16 stewardship practices to protect the contributing resources of the NHL. Based on the building  
17 and landscape assessments undertaken thus far, it was determined that certain key character-  
18 defining features should be considered in determining opportunities for preservation under all of  
19 the alternatives. These features include the following:

- 20 • The historic internal roadway network
- 21 • Undisturbed historic woodlands on and near the North Parcel Study Area
- 22 • Historic views into and out of the North Parcel
- 23 • The historic wall along MLK Avenue
- 24 • The entry road sequence from Gate 1 to the West Campus and the associated historic  
25 landscape features and viewsheds.

26 **3.1.2.2 Congress Heights**

27 The portion of MLK Avenue from the southern border of the St. Elizabeths Campus to  
28 Alabama Avenue extends through the Congress Heights neighborhood. A survey of Congress  
29 Heights in 1987-1988 identified some properties within the neighborhood that may be  
30 individually eligible for the NRHP or may contribute to an historic district, but has not been  
31 evaluated for significance. These properties include the Congress Heights School and  
32 approximately 38 other buildings along MLK Avenue that, for the purposes of this EIS and the

1 Section 106 process for this undertaking, are considered contributing resources to the National  
2 Register-eligible Congress Heights Historic District.

### 3 **3.1.2.3 Shepherd Parkway**

4 The 205.5-acre Shepherd Parkway, which is along the eastern side of I-295 south of the St.  
5 Elizabeths West Campus, is under the jurisdiction of NPS and is part of the Fort Circle Parks in  
6 the District of Columbia (NPS 2000). The Shepherd Parkway was originally intended to provide  
7 a roadway linking with other Fort Circle Parks, but the roadway was never constructed.

8 Shepherd Parkway remains general parkland (GSA 2008a). The western edge of the Shepherd  
9 Parkway is being considered for use by improvements to the I-295/Malcolm X Avenue  
10 interchange and the proposed West Campus Access Road. Additional information on existing  
11 conditions in the Shepherd Parkway is also provided in the paragraphs below.

### 12 **3.1.2.4 Views**

13 Significant historic and nonhistoric viewsheds and vistas to and from the East Campus, western  
14 portion of the West Campus, and the Shepherd Parkway were assessed to help determine where  
15 new buildings should be placed and to determine building heights and densities. Historic views  
16 from the North Parcel include views towards Maple Square to the south of the North Parcel  
17 Study Area. In addition, the overall spatial organization of the East Campus, its specimen tree  
18 canopy over broad lawns, the curving walks and drives, and changes in elevation provided a  
19 variety of views within the campus that contributed to patient therapy. Historic views to and  
20 from the western portion of the West Campus include episodic views from the plateau toward  
21 the Potomac and Anacostia rivers and downtown Washington, views across wooded areas, views  
22 from across the Anacostia River toward the topographic bowl that encircles the District of  
23 Columbia, views toward Virginia and downtown Washington from the West Campus Cemetery,  
24 and internal views of the cemetery. Significant historic and nonhistoric viewsheds and vistas to  
25 and from the Shepherd Parkway and its historic properties include wooded areas and the  
26 topographic bowl.

### 27 **3.1.2.5 Topography**

28 The St. Elizabeths East Campus and MLK Avenue topography are characterized by a flat  
29 plateau at approximately 150 feet above mean sea level (msl) with steep slopes towards the east.  
30 Construction on steep slopes can be problematic due to potential for slope failures and erosion  
31 of soils.

1 The project team took the topographic features of the site into consideration when developing  
2 alternatives by minimizing the amount of building on steep slopes, maintaining natural  
3 vegetation to the extent possible, and stepping buildings down more gradual slopes to minimize  
4 the heights of buildings.

5 The I-295/Malcolm X Avenue interchange, the proposed West Campus Access Road corridor,  
6 and the Firth Sterling Avenue/West Campus Access Road intersection are located in a transition  
7 area from predominately flat topography to steep slopes (15 percent or greater) within and  
8 adjacent to the West Campus and Shepherd Parkway (GSA 2008a).

### 9 **3.1.2.6 Access/Roadway Network**

10 The regional roadway network and access to the St. Elizabeths Campus was studied to assist in  
11 determining the existing network capacity, the availability of mass transit and other intermodal  
12 solutions to access, and the need for additional vehicular access points to the campus to support  
13 DHS Headquarters consolidation.

14 Regional vehicular access to St. Elizabeths is provided via I-95, I-295, and I-395 from the north  
15 and south, and Route 50 and I-66 from the east and the west. The local roadway network also  
16 provides access from Suitland Parkway, South Capitol Street, Firth Sterling Avenue, Malcolm X  
17 Avenue, and MLK Avenue. The East Campus has direct access on MLK Avenue via one gate  
18 and on Alabama Avenue by one gate. Primary roadways on the East Campus include Oak  
19 Drive, Sycamore Drive, and Pecan Street. A vehicle/pedestrian tunnel connects the East and  
20 West Campuses. Regional traffic in the vicinity of St. Elizabeths is congested at times during the  
21 rush hour periods.

22 There are two Metrorail stations near St. Elizabeths, the Anacostia and Congress Heights  
23 stations, both on the Green Line. The Anacostia Metrorail Station is approximately 0.53 miles  
24 from East Campus Gate 1 (see **Figure 1-3** for locations of gates), and the Congress Heights  
25 Metrorail Station is approximately 1.0 mile from East Campus Gate 1. In addition, a number of  
26 bus routes on MLK Avenue provide accessibility to local destinations including the Anacostia  
27 Metrorail Station. The area presently lacks dedicated bicycle routes and paths.

### 28 **3.1.2.7 Environmental Contamination**

29 Information collected from historical sources and site investigations indicate that many of the  
30 steep slopes east of the North Parcel Study Area and in the western portion of the West Campus  
31 have been filled with incinerator fly ash that was disposed of when the northern portion of the  
32 East Campus was used as a licensed landfill during the 1980s (GSA 2008d). Along the steep

1 slopes in the Shepherd Parkway there is debris from unauthorized dumping (GSA 2008a). In  
2 addition, other hazardous materials are found in buildings and equipment on the East Campus  
3 including lead-based paint, asbestos, and polychlorinated biphenyls (PCBs).

#### 4 **3.1.2.8 Natural Resources**

5 The St. Elizabeths East Campus contains natural resources including wetlands, streams, and  
6 large contiguous forested areas. The project team assessed the condition of natural resources  
7 and minimized construction in areas with mature forested areas, wetlands, and streams.

8 The parkland in and around the Shepherd Parkway contains mature native hardwood forest,  
9 unique geologic features, and a bald eagle nest. A 660-foot radius exclusion area is maintained  
10 around the nest (GSA 2008a).

#### 11 **3.1.2.9 Utilities**

12 Many of the basic utilities on the St. Elizabeths East Campus and along some of the major  
13 transportation corridors in the vicinity were originally constructed in the early 20th century,  
14 including water, sewer, and electrical lines. Due to the age of the utilities, many are in poor  
15 condition and would need to be replaced to accommodate new construction and reuse of  
16 historic structures on the campus. Modern utilities such as fiber optic cables are not extensively  
17 present on the site and would need to be added. GSA considered the requirement to repair,  
18 replace, and upgrade utilities when developing the action alternatives.

## 19 **3.2 Components of the Proposed Action**

### 20 **3.2.1 East Campus North Parcel Development**

21 GSA is proposing to complete the consolidation of DHS Headquarters at St. Elizabeths by  
22 amending the 2008 Master Plan to construct and operate up to approximately 750,000 gross  
23 square feet of secure office space plus approximately 267,000 square feet of parking for a total of  
24 just over one million gross square feet of development within the approximately 32-acre East  
25 Campus North Parcel Study Area (see **Figure 1-3**). The headquarters of FEMA, a DHS  
26 component agency, would be located on the North Parcel to house approximately 3,089 FEMA  
27 headquarters staff. Occupation would occur by 2014. The new DHS/FEMA headquarters  
28 buildings would likely be five to seven stories above the current ground surface on the western  
29 side of the North Parcel. Development of the North Parcel would also include the following:

- 30 • Parking garage for approximately 775 vehicles

- 1 • Sidewalks and surface parking
- 2 • Tunnel under MLK Avenue linking the East and West Campuses (campus connection)
- 3 • Secure perimeter fence
- 4 • VIP access and parking
- 5 • Shipping/receiving dock
- 6 • Shuttle bus hub
- 7 • Electric power, communications, and other utility corridors
- 8 • Realignment of site drainages and landscaping
- 9 • Transportation improvements to support East Campus North Parcel development.

10 The North Parcel Study Area is currently occupied by Cottages 8 and 9 (Buildings 79  
11 [approximately 2,161 square feet] and 86 [2,140 square feet], respectively); Dix Pavilion (Building  
12 120 [214,985 square feet]); Garage/Motor pool (Building 81 [10,400 square feet]); Veterans  
13 Shelter (Building 81A [140,870 square feet]); Dry Barn (Building 82 [7,500 square feet]); Horse  
14 Barn (Building 83 [21,200 square feet]); and associated smaller structures, sidewalks, and parking  
15 lots. Therefore, to accomplish the Proposed Action, existing structures would be retained,  
16 relocated, or demolished. The Dix Pavilion would be demolished to prepare the site for the  
17 FEMA facility. The existing Veterans Shelter would be demolished and its operations would be  
18 relocated by the District of Columbia Department of Human Services. The proposed site of the  
19 Veterans Shelter would be northeast of the psychiatric hospital's John Howard Pavilion, close to  
20 a location proposed for a new water tower to replace the existing aging water tower on the East  
21 Campus. The Dry Barn, Horse Barn, and Cottages would be retained as they would be outside  
22 the secure perimeter of the FEMA facility.

23 As part of the master planning process, a wide range of initial studies and “test fits” were  
24 developed for the North Parcel and reviewed by GSA, DHS, DMPED, DCOP, and the  
25 Consulting Parties. Comments were incorporated and the concepts were modified and refined  
26 accordingly. Using this iterative process, three of these refined “initial studies” were selected by  
27 GSA and DHS for further development and carried forth for further analysis as alternatives in  
28 this EIS. These are identified as Alternatives A, B, and C and described in **Section 3.4.1**.

### 29 **3.2.2 Transportation Improvements**

30 In addition to development of the North Parcel, GSA is also reevaluating in this Master Plan  
31 Amendment EIS transportation improvements required for the DHS consolidation that were

1 considered in the 2008 Final Master Plan EIS. In its 2008 Final Master Plan EIS, GSA and  
2 DDOT identified various public and controlled access transportation improvements that would  
3 be required to support redevelopment of the St. Elizabeths Campus.

4 Four transportation alternatives (i.e., I-1 through I-4) and variations within each alternative, plus  
5 a “no-build” alternative (i.e., I-0), were evaluated in the 2008 Final Master Plan EIS for the Firth  
6 Sterling Avenue/West Campus Access Road intersection and the I-295/Malcolm X Avenue  
7 partial interchange. Alternatives for a new road that would provide access to the St. Elizabeths  
8 West Campus at a gated entrance to the south of the West Campus Cemetery were evaluated.  
9 Finally, two transportation alignment alternatives were considered for improvements to MLK  
10 Avenue for vehicles accessing the St. Elizabeths Campus. Evaluation of these alignment  
11 alternatives considered existing deficiencies noted throughout the transportation network in the  
12 vicinity of the St. Elizabeths Campus, including the I-295/Malcolm X Avenue interchange,  
13 South Capitol Street/Malcolm X Avenue interchange, the main Joint Base Anacostia-Bolling  
14 access gate, Suitland Parkway/Firth Sterling Avenue intersection, and along MLK Avenue.

15 The alternatives evaluated in the 2008 Final Master Plan EIS did not adequately reflect traffic  
16 impacts to the surrounding area beyond the actual boundaries of the St. Elizabeths Campus.  
17 Due to the number of trips anticipated to and from the campus by various modes of  
18 transportation, it was necessary to look beyond the actual boundaries to determine the impacts  
19 on the network as a whole and provide adequate facilities to accommodate the various modes.  
20 More recent efforts to determine the anticipated facilities needs and impacts have also required  
21 more detailed levels of analysis. In addition, the base model used for the traffic forecasting  
22 conditions in the 2008 Final Master Plan EIS did not account for a number of changes in the  
23 immediately surrounding transportation infrastructure or land use that have changed and were  
24 not known at that time. Changes in infrastructure include revisions to the 11<sup>th</sup> Street Bridges  
25 Interchange ramps along I-295; modifications to the I-295/South Capitol Street/Suitland  
26 Parkway interchange; and changes to the existing and proposed configuration of MLK Avenue  
27 within Anacostia. Significant revisions to land use and development include increases in  
28 employment at Joint Base Bolling, redevelopment efforts by the District of Columbia at Poplar  
29 Point, Barry Farm, Anacostia Metro Station Transit-Oriented-Development, St. Elizabeths East  
30 Campus, and the Great Streets redevelopment program for MLK Avenue. This combination of  
31 impacts changes the nature of trip generation and distribution through the transportation  
32 network in a manner that affects the transportation needs associated with the DHS  
33 Headquarters consolidation. As such, additional alternatives for transportation improvements  
34 were required to be developed and reevaluated to address the changes in traffic levels.

1 To fully address the transportation needs for DHS consolidation, it was determined that a more  
2 regional approach should be considered for developing transportation solutions. A collaborative  
3 team of GSA, DDOT, FHWA, and DHS representatives and contractors was assembled to  
4 develop the St. Elizabeths TTR (see **Section 3.1.1**) that addresses not only the DHS  
5 requirements but also the future growth of the area. The reevaluation in this EIS focuses on  
6 impacts from refinement in planning and changes in impact area footprints for the  
7 transportation improvements. The locations of these improvements were identified in **Figure 1-**  
8 **2** and include the following:

- 9 • I-295/Malcolm X Avenue interchange improvements and proposed West Campus  
10 Access Road
- 11 • Firth Sterling Avenue intersection with the proposed West Campus Access Road
- 12 • Improvements to MLK Avenue between the St. Elizabeths Campus and Alabama  
13 Avenue.

14 Two refined transportation improvement alternatives carried forth for reevaluation in this EIS  
15 are discussed in **Section 3.4.2**.

### 16 **3.3 No Action Alternative**

17 Under the No Action Alternative, GSA would not develop 750,000 gross square feet of secure  
18 office space plus associated parking on the North Parcel to complete the consolidation of the  
19 DHS Headquarters on St. Elizabeths.

20 Pursuant to the ROD for the 2008 Final Master Plan EIS (GSA 2008b), if the Proposed Action  
21 as described in **Section 3.2** is not approved, GSA would issue a revised ROD implementing  
22 Campus Development Alternative 4 as described in the 2008 Final Master Plan EIS, plus  
23 “Master Plan Revisions” for the USCG Headquarters proposed on the West Campus and  
24 Campus security fence from what was presented as the Preferred Alternative (Alternative 5) in  
25 that EIS (GSA 2009a). The design of the USCG Headquarters and security fence was formally  
26 approved by NCPC on April 30, 2009 (NCPC 2009). This compilation is analyzed in this  
27 Master Plan Amendment EIS as the No Action Alternative and consists of two elements,  
28 Campus Development and Transportation Improvements.

29 ***Campus Development.*** Under the No Action Alternative, all development to support DHS  
30 Headquarters consolidation at St. Elizabeths would occur on the West Campus. **Table 3-1**  
31 provides the gross square feet of buildings in each building group and the total gross square feet

1 Table 3-1. Proposed St. Elizabeths West Campus Redevelopment – No Action Alternative

| Buildings                               | Area (Gross square feet) Above Grade | Area (Gross square feet) Below Grade | Area (Gross square feet) Total |
|---|--------------------------------------|--------------------------------------|--------------------------------|
| Group A                                 | 592,039                              | 30,718                               | 622,757                        |
| Group B                                 | 968,907                              | 71,778                               | 1,040,685                      |
| Group C                                 | 618,714                              | 96,358                               | 715,072                        |
| Group D                                 | 1,017,853                            | 157,075                              | 1,174,927                      |
| Group E                                 | 0                                    | 0                                    | 0                              |
| Group F                                 | 654,896                              | 326,659                              | 981,555                        |
| <b>Total Building Gross Square Feet</b> | <b>3,852,409</b>                     | <b>682,588</b>                       | <b>4,534,997</b>               |
| Parking Structures                      | Above Grade                          | Below Grade                          | Total                          |
| Parking Spaces                          | 1,745                                | 2,489                                | 4,234                          |
| Area (gross square feet)                | 613,200                              | 874,700                              | 1,487,900                      |
| <b>Total Gross Square Feet</b>          | <b>4,465,609</b>                     | <b>1,557,288</b>                     | <b>6,022,897</b>               |

Source: GSA 2008a

2 of development and parking for the No Action Alternative. **Figure 3-1** illustrates the building  
 3 groups evaluated under the No Action Alternative.

4 The Center Building would be retained for functional office space with limited new additions for  
 5 circulation ranging in size from two to five stories in height and from approximately 2,000 to  
 6 6,000 gross square feet and would be constructed on the south side of the building. The extent  
 7 of the additions would be determined during the design phase. New construction in the area  
 8 along MLK Avenue between Gates 1 and 2 would range from one to three and a half stories in  
 9 height.

10 In addition, new buildings would be placed behind the southwest portion of the Center Building  
 11 ranging from two to three stories in height. New development ranging from three to five stories  
 12 in height would be placed across from Buildings 72, 73, 74, and 75 (M, C, A, and B Buildings)  
 13 with the newly proposed construction maintaining the existing patterns of roadways; and the  
 14 lower story buildings between Buildings 64 and 68 with the taller buildings behind these  
 15 buildings at the edge of the plateau.

16 New construction in the southwestern portion of the West Campus would consist of a  
 17 collection of new buildings in a series of quadrangles that would be built on the plateau and into  
 18 the side of the hill down to the current warehouse location. These buildings would range from  
 19 three to five stories in height at the low point of the ravine. During the design process for the



- 1
- 2 Source: GSA 2008a
- 3 **Figure 3-1. No Action Alternative Building Groupings**

1 USCG Headquarters following publication of the 2008 Final Master Plan EIS and ROD,  
2 changes to the location of the headquarters facility and associated parking areas in the  
3 southwestern portion of the West Campus were proposed and documented as the Master Plan  
4 Revisions. Under these revised plans approved by NCPC, the USCG Headquarters and  
5 associated parking garages would be farther south of the location shown in the 2008 Master  
6 Plan. The proposed West Campus security fence would be realigned to account for relocation  
7 of the parking garages (see **Figure 3-2**). In addition, the entrance into the West Campus from  
8 the proposed West Campus Access Road would be farther to the south, and existing Holly  
9 Street in the southwestern corner of the West Campus would be reconstructed to remove the  
10 existing switchback (GSA 2009a). The security plan for the West Campus also was modified as  
11 follows:

- 12 • The DHS secure perimeter would now include the West Campus Cemetery and its  
13 surrounding existing cemetery fence, and would be within the fenceline for GSA's  
14 property.
- 15 • The visitor center at Gate 2 on MLK Avenue would be modified from what was  
16 analyzed in the 2008 Final Master Plan EIS. Pine Street, which connects MLK Avenue  
17 with Redwood Drive to the west, would be removed. The new visitor center would be  
18 moved from adjacent to the existing gatehouse to the northwest and would double in  
19 size. Slightly more pavement and retaining walls would be installed (GSA 2010b).

20 The site topography would largely conceal these structures from both internal and external  
21 views. There is also a one-story, approximately 20-foot-high addition onto the existing power  
22 plant to be used for co-generation or other central utility functions.

23 Under the No Action Alternative, parking would be provided at a ratio of 1 parking space for  
24 every 4 employees for approximately 12,863 employees and at a ratio of 1 parking space for  
25 every 3 employees for approximately 1,137 employees in positions that are staffed for 24 hours a  
26 day and 7 days a week, plus 640 visitor spaces for a total of approximately 4,234 parking spaces  
27 on site. Parking would be underground (2,489 spaces) between the northern boundary of the  
28 site at and between Gates 1 and 2 and in the underground portion of the parking structure in the  
29 southwest portion of the West Campus. Aboveground parking structures (1,745 spaces) would  
30 be near the ravine. Under this alternative, satellite dishes would be placed above the ravine  
31 overlooking the power plant.

32 A total of 50 buildings contributing to the NHL would be rehabilitated and adaptively reused,  
33 and 13 contributing buildings would be demolished. Of the 13 buildings to be demolished, 8 are



- 1
- 2 Source: GSA 2009a
- 3 **Figure 3-2. Master Plan Revisions as Part of the No Action Alternative**

1 the existing greenhouses which are in extremely deteriorated condition and have low reuse  
2 potential. Seven noncontributing buildings would be demolished under this alternative.

3 The following measures would be taken to minimize or mitigate impacts on the West Campus  
4 under the No Action Alternative:

- 5 • Creating 2,489 parking spaces below grade between the northern property boundary (in  
6 the vicinity of the former greenhouses) and between Gates 1 and 2 and in the  
7 underground portion of the parking structures. The below grade structures minimize the  
8 impact on the site area, re-create green open space, retain unobstructed historic  
9 viewsheds, and do not impinge on the scale and spacing between and among the historic  
10 buildings.
- 11 • Limiting new building heights and footprints between Gates 1 and 2 to three stories  
12 (35 feet) minimizes the impact of the massing of these buildings adjacent to historic  
13 smaller-scale structures (Buildings 32, 36, 37, and 75).
- 14 • Preserving the Burroughs Cottage (Building 18) and the green space around it, and open  
15 views from Gate 1 to the northern edge of the site, by not constructing new buildings  
16 above grade in the area of the former greenhouses.
- 17 • Breaking down the massing of new construction on the former Howard Hall and the  
18 noncontributing warehouse sites into 75-foot-wide office blocks, two to three stories  
19 above grade interspersed with deep, 50-foot-wide courtyards, all built into the steep  
20 topography of the slope.
- 21 • Burying the warehouse building at the northwestern corner of the site into the slope and  
22 renewing the agricultural production meadow landscape character from the period of  
23 significance in the area.
- 24 • Preserving the power plant structures (Buildings 53, 56, 57, and 123) for adaptive reuse  
25 as the campus central plant, as they were originally intended.
- 26 • Keeping new buildings adjacent to the southern formal lawn and tree canopy plateau  
27 space across from Buildings 72, 73, 74, and 75, to a height of three stories (35 feet high)  
28 to match new construction scale to adjacent historic buildings facing onto that lawn,  
29 thereby reestablishing historic definition of the lawn and renewing historic spatial  
30 relationships between and among buildings and landscape features.
- 31 • Breaking the building mass of new construction behind the buildings facing the lawn on  
32 the plateau area into narrower footprints placed on east-west axis to allow slot views

1 from the historic eastern Administration buildings complex through the lawn, through  
2 the newly constructed buildings and beyond out of the site.

- 3 • Avoiding new construction in undisturbed historic woodlands on the site.
- 4 • Removing nonhistoric surface parking lots and circulation features to renew aspects of  
5 the verdant therapeutic landscape.

6 Additional mitigation measures could be negotiated and identified in the amended or updated  
7 PA between the DCHPO, ACHP, NCPC, and other Consulting Parties.

8 Under the No Action Alternative, the District of Columbia would continue to pursue  
9 redevelopment of the St. Elizabeths East Campus in keeping with their Redevelopment  
10 Framework Plan (DCOP 2008). On the East Campus, Cottages 8 and 9 (Buildings 79 and 86)  
11 and the Veterans Shelter operations would not be relocated, and the Dix Pavilion (Building 120)  
12 and Garage/Motor pool (Building 81) would not be demolished. However, the future of these  
13 structures would be subject to the District of Columbia's redevelopment of the East Campus  
14 and might be demolished or moved by the District of Columbia at some time in the future.

15 ***Transportation Improvements.*** Under the No Action Alternative, the following traffic  
16 improvements would be implemented to provide access to the St. Elizabeths West Campus.  
17 These alternatives were evaluated as Alternative I-0, plus improvements to MLK Avenue, in the  
18 2008 Final Master Plan EIS. **Figure 3-3** shows the No Action Alternative transportation  
19 improvements.

- 20 • ***West Campus Access Road.*** An Access Road would be constructed connecting the  
21 west side of the West Campus with Firth Sterling Avenue.
- 22 • ***Firth Sterling Avenue Improvements.*** The intersection of Firth Sterling Avenue with  
23 Stevens Road and Barry Road, one block north of the St. Elizabeths West Campus,  
24 would be reconfigured to allow a functional and safe tie-in to the proposed West  
25 Campus Access Road.
- 26 • ***MLK Avenue Improvements.*** The current configuration of MLK Avenue is four  
27 10-foot-wide lanes and two 5-foot-wide sidewalks. MLK Avenue would be widened to  
28 accommodate turning lanes into gates on the West Campus. The widening would occur  
29 on the eastern side of MLK Avenue and require land from the St. Elizabeths East  
30 Campus (GSA 2008a).



1 The No Action Alternative is prescribed by CEQ regulations (40 CFR 1502.14(d)) and serves as a  
2 baseline for evaluating the environmental impacts of the Proposed Action and alternatives. The No  
3 Action Alternative in this EIS represents a worst-case scenario.

## 4 **3.4 Alternatives Considered in this EIS**

### 5 **3.4.1 East Campus North Parcel Site Development Alternatives**

6 Conceptual development plans evaluated for the North Parcel considered the following site  
7 development elements. The nature of these elements might or might not vary among the concepts.

- 8 • Land Use and Future D.C. Development Parcels
- 9 • Relationship to the Historic Adjacent Context
- 10 • Relationship to the East Campus
- 11 • Relationship to the West Campus
- 12 • Building Density and Heights
- 13 • New Access Roads
- 14 • Programmatic Requirements and Design Parameters
- 15 • Building Use by Functional Division
- 16 • Landscape
- 17 • Views
  - 18 ○ Regional Views
  - 19 ○ Neighborhood Views
  - 20 ○ Views from Within the Site
- 21 • Access and Circulation
  - 22 ○ Vehicular Circulation
  - 23 ○ Parking
  - 24 ○ Pedestrian Circulation
  - 25 ○ Transit
- 26 • Site Environment
  - 27 ○ Storm water
  - 28 ○ LEED Green Building Rating System

- 1 • Site Infrastructure
- 2 • Security
- 3 • Development Phasing
- 4 • Building Efficiency, Constructability, and Schedule.

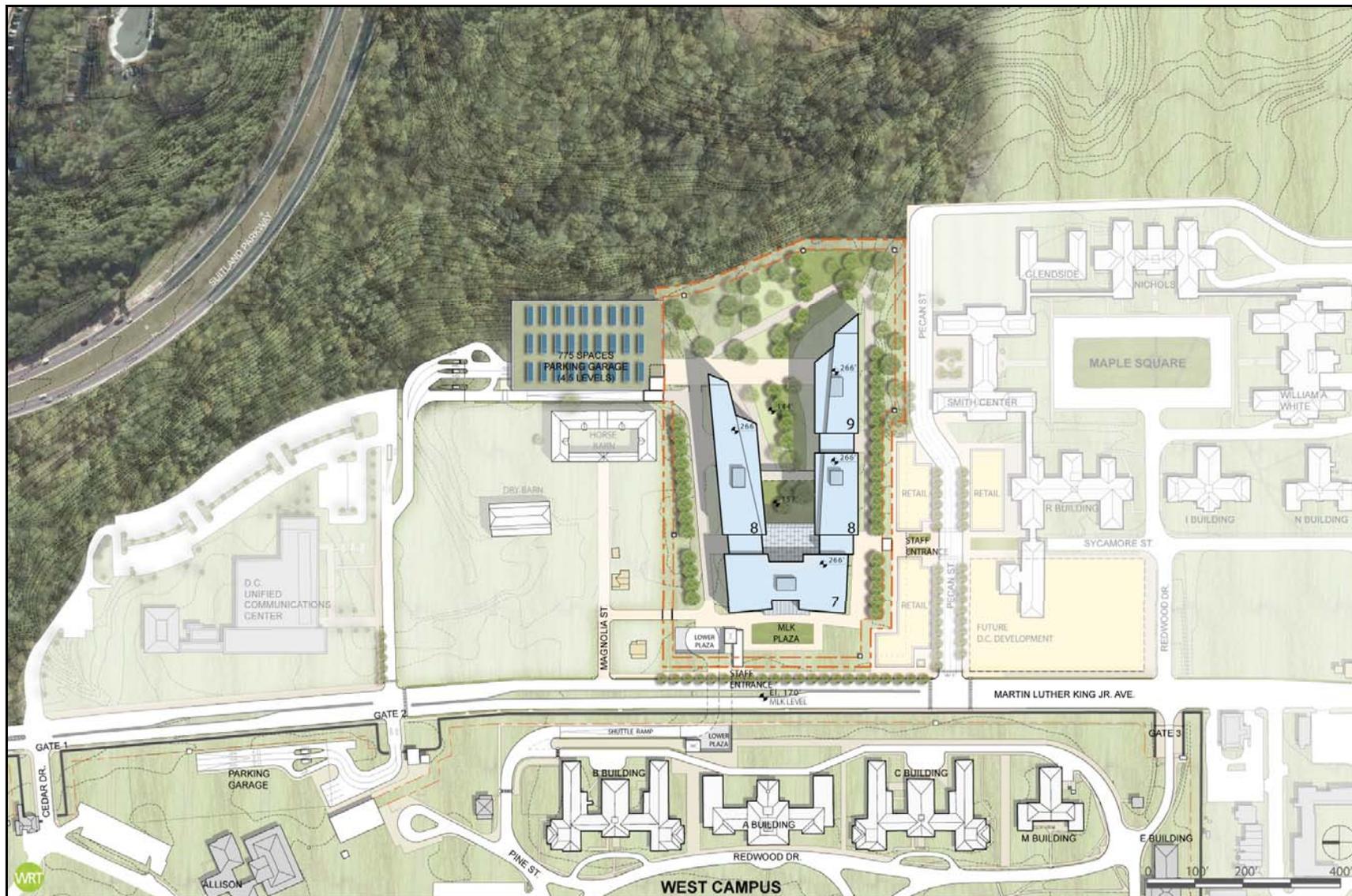
5 Development on the North Parcel would be planned along the length of Pecan Street adjacent to  
6 the parcel to the south. This would maximize interaction of DHS employees with potential future  
7 District of Columbia development on the East Campus. A reconfigured Pecan Street would also  
8 serve as a DHS employee shuttle bus hub for buses running between the North Parcel and area  
9 Metrorail stations via the East Campus or MLK Avenue.

10 Conceptual layouts of the three proposed alternatives are shown in **Figures 3-4** through **3-6** and are  
11 diagrammatic in nature and are not intended to show final versions of schematic design concepts or  
12 other architectural features that would be developed as part of the design process. Each alternative  
13 is based on development of a new 750,000 gross square foot facility for FEMA, and a 775-space  
14 employee parking structure. Each alternative situates a building for FEMA on the site of the  
15 existing Dix Pavilion, plus the topographic depression to the east of that building. Each alternative  
16 is based on a new FEMA facility that faces MLK Avenue, incorporates a required minimum setback  
17 from the security fence on MLK Avenue, and reinforces the concept of a unified campus for DHS  
18 by minimizing the distance between the East and West campuses. This concept also provides an  
19 opportunity for the new facility to have a strong public “presence” on MLK Avenue.

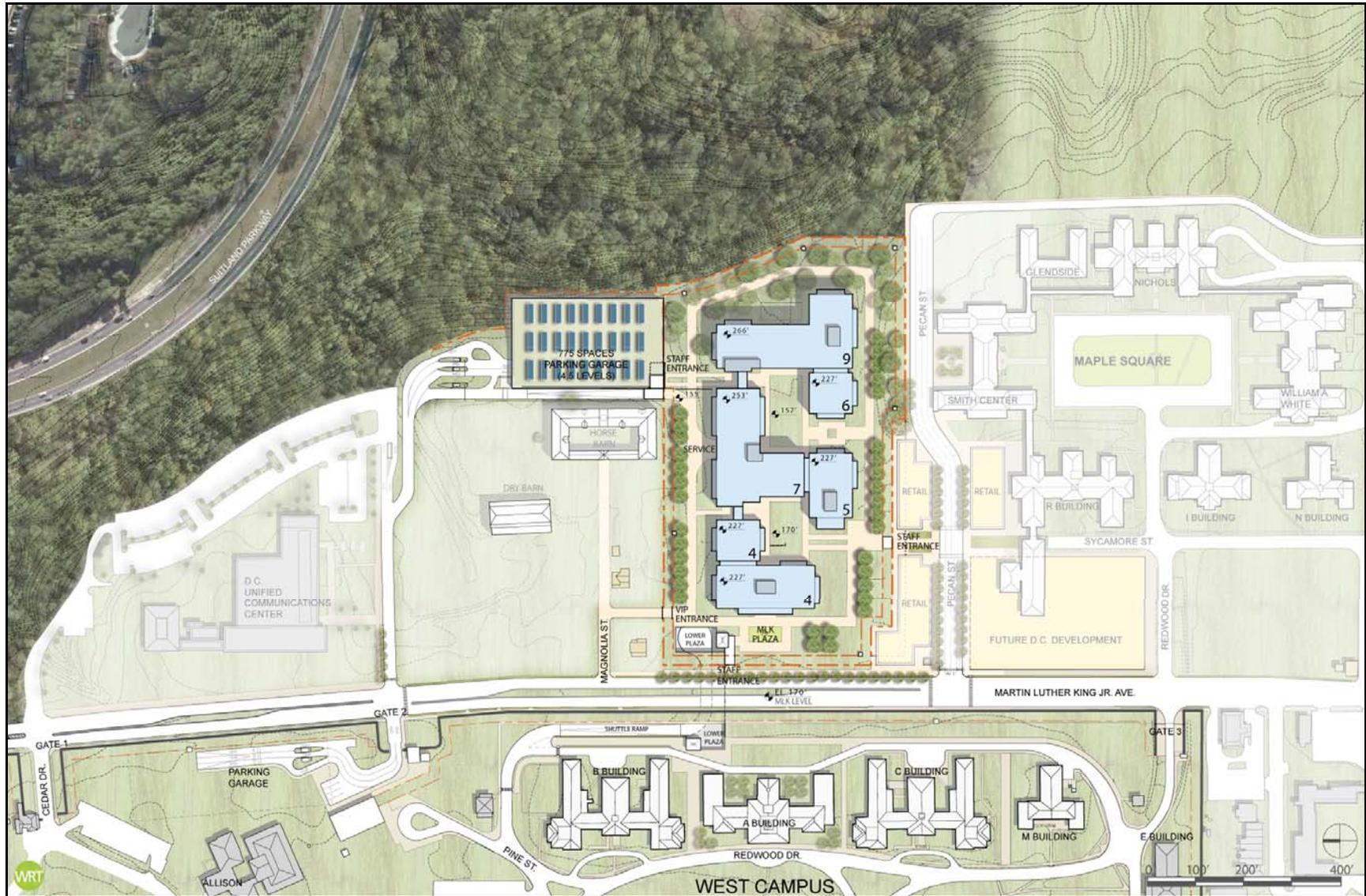
20 New construction would be designed in accordance with GSA’s Public Buildings Service (PBS)  
21 Facilities Standards (P100) for design at historic facilities and GSA’s Design Excellence Program.  
22 The facility would be designed as an ISC Level V Facility in a manner that remains sensitive to  
23 neighboring communities. Security fencing, shown with dotted lines on the figures, marks the  
24 border of the secure campus. Two security fences around the FEMA facility, an outer fence and an  
25 inner fence, would be approximately 8 feet tall and 20 feet apart.

26 A central chilled water plant installed for the FEMA facility with approximately four water-cooled  
27 chillers would provide a total cooling capacity of approximately 2,000 tons of refrigeration. High-  
28 efficiency, condensing-type boilers would be used to provide hot water for heating the building.

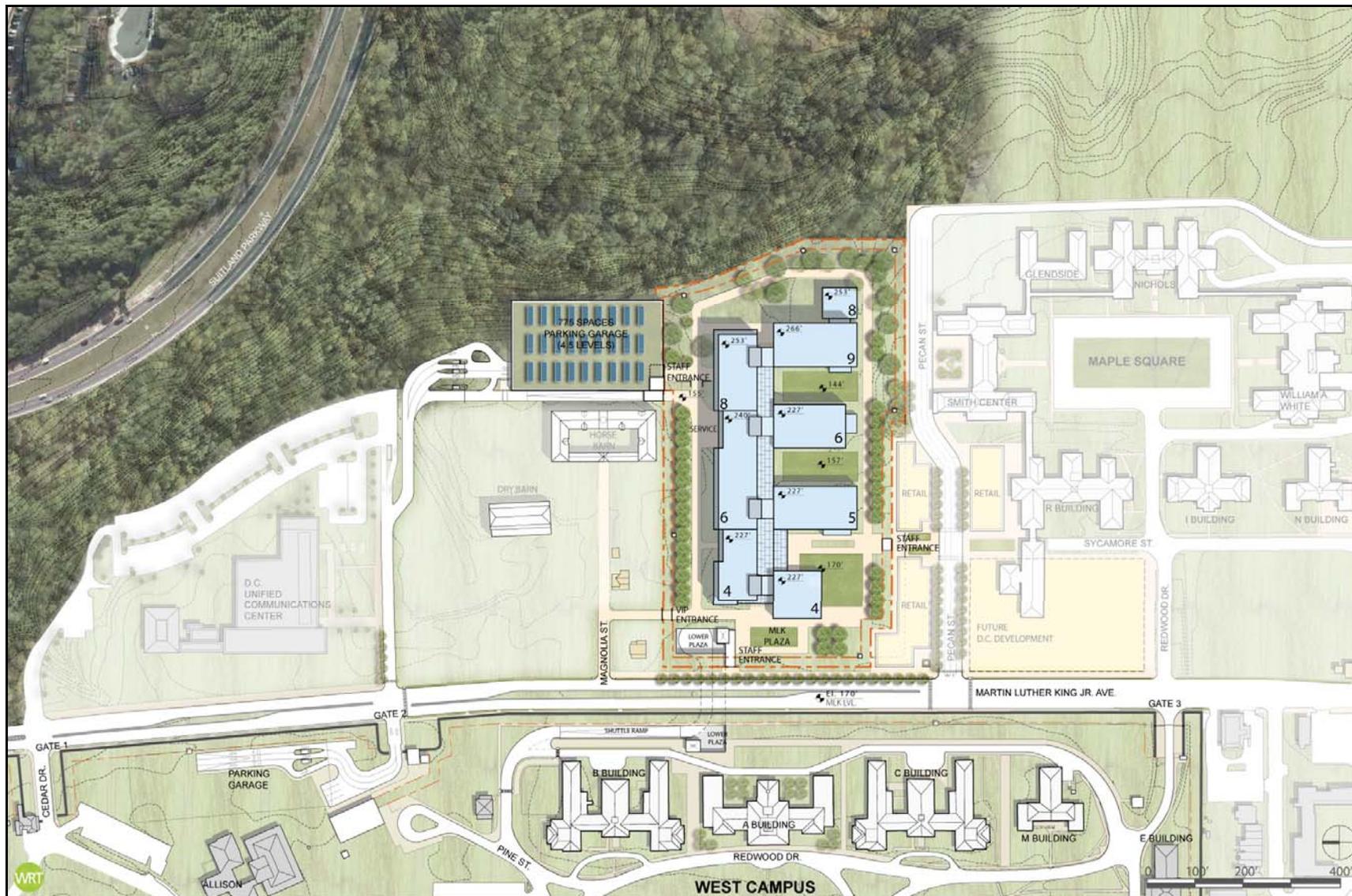
29 Total input heating capacity of the plant would be approximately 32 million British thermal units  
30 (Btus) per hour. The hot water would be distributed from the central plant with approximately five  
31 base- mounted centrifugal pumps each delivering 600 to 800 gallons per minute (gpm). Two 1,500-  
32 kilowatt (kW) standby generators would provide backup emergency power for one-third of the  
33 FEMA facility’s normal operating power loads as necessary.



1  
2 Figure 3-4. Alternative A: East-West Bars



1  
2 Figure 3-5. Alternative B: Campus Reflection



1  
2 **Figure 3-6. Alternative C: Atrium**

1 Access within the secure campus would be restricted to employees and visitors on official  
2 business. Employees not parking on site would get to and from the East Campus by shuttles,  
3 buses, or carpools. A TMP will be in place to assist employees with finding ways to get to work.

#### 4 **3.4.1.1 Alternative A: East-West Bars**

5 Under Alternative A, the FEMA facility would be organized into two long, roughly parallel,  
6 office wings or “bars” (see **Figure 3-4**). The east-west orientation is ideal for energy efficiency  
7 and optimizing the use of daylight, and also relates well to the direction of storm water flow,  
8 from west to east. The ends of the wings closest to MLK Avenue (and the West Campus) are  
9 joined together by an atrium. Although the height of the building would not exceed an elevation  
10 of 271 feet above msl (the approximate elevation of the top of the existing Dorothea Dix  
11 Pavilion), the number of stories increases from a maximum of seven to nine from west to east,  
12 in relation to the downward-sloping topographic characteristics of the site in that direction. The  
13 easternmost wings of the building flare out slightly and define an open landscaped space that is  
14 oriented toward the wooded stream corridor and valley to the east.

15 Under Alternative A, the building would be efficiently organized, particularly at the western ends  
16 around the atrium, where interoffice communication is relatively better than at the eastern ends  
17 of the building. The building would fit naturally on the site, in the topographic depression,  
18 minimizing the need to disturb existing topography and vegetation. No substantial  
19 constructability issues are apparent.

20 Although the north side of the FEMA building would be about 120 feet from the Horse Barn  
21 and the south side of the building would be about 160 feet from the Smith Center (Building 90),  
22 the long facades of the FEMA building and the related heights (up to nine stories tall) could  
23 pose a design challenge in relation to these historic structures.

24 Employee parking would be located in a structure to the east of (i.e., behind) Building 83, the  
25 Horse Barn (a concept that is illustrated in the District of Columbia’s East Campus  
26 Redevelopment Framework Plan), but is planned to be no higher than the barn by taking  
27 advantage of the sloping terrain to the east. The parking structure would be “hidden” behind  
28 the Horse Barn and would also not be readily seen from the FEMA building. The parking  
29 structure would take advantage of the existing ravine’s slope to the east, such that its five levels  
30 would consist of three levels that would be below grade on the structure’s western side, with all  
31 levels above grade on its eastern side. An open façade for the structure would be facing the  
32 forested drainage to the east of the North Parcel. This would require excavation, but, based on a  
33 Phase I Environmental Site Assessment for the North Parcel (GSA 2008d), a topographic and

1 boundary survey completed in November 2009, and visual surveys of the parcel, the location  
2 appears to be composed of some fill and disturbed vegetation. A below grade, truck-loading  
3 dock would be located adjacent to the parking structure. A green roof with photovoltaic array is  
4 being considered to be installed on the top level of the parking structure. The green roof could  
5 allow percolation of storm water, thereby reducing storm water flow velocity and quantity, and  
6 could be beneficial to storm water quality. The photovoltaic array could provide clean solar  
7 energy for the parking garage.

8 For Alternative A, employee parking and site access would be provided from Pine Street, which  
9 intersects MLK Avenue at Gate 2 of the East Campus, in the southern portion of the UCC site.  
10 This access point would become a signalized intersection. A paved driveway would extend from  
11 Pine Street to the proposed parking garage. The driveway would not be wider than the existing  
12 Pine Street, except where it would widen to accommodate guard booths.

13 A newly realigned Pecan Street has been assumed along the southern boundary of the North  
14 Parcel to accommodate DHS shuttle buses in bus bays from the Congress Heights Metrorail  
15 Station and for other mass transit access. The intersection of Pecan Street with MLK Avenue  
16 would be signalized, and a left-turn lane would be added to southbound MLK Avenue. The bus  
17 bays along Pecan Street would be parallel design, where buses can completely pull off from  
18 travel lanes for passenger boarding and alighting. Five parallel bus bays are proposed along  
19 either side of Pecan Street (10 total bus bays) near the intersection with MLK Avenue. Each bus  
20 bay would measure 12 feet by 80 feet.

21 Alternative A would include a secure underground connection linking the East and West  
22 Campuses to accommodate utilities, pedestrians, and some small shuttle vehicles. The  
23 connection would be accessed from below the FEMA facility on the East Campus and would  
24 consist of pedestrian access and a vehicle ramp on the eastern edge of the West Campus. The  
25 location and design of this necessary functional connection are somewhat independent of the  
26 building concepts, since each building is proposed in the same general location on the East  
27 Campus.

28 Specific locations for temporary construction staging activities have not been identified at this  
29 time; however it is expected that staging would occur in open areas within or near the North  
30 Parcel.

### 31 **3.4.1.2 Alternative B: Campus Reflection**

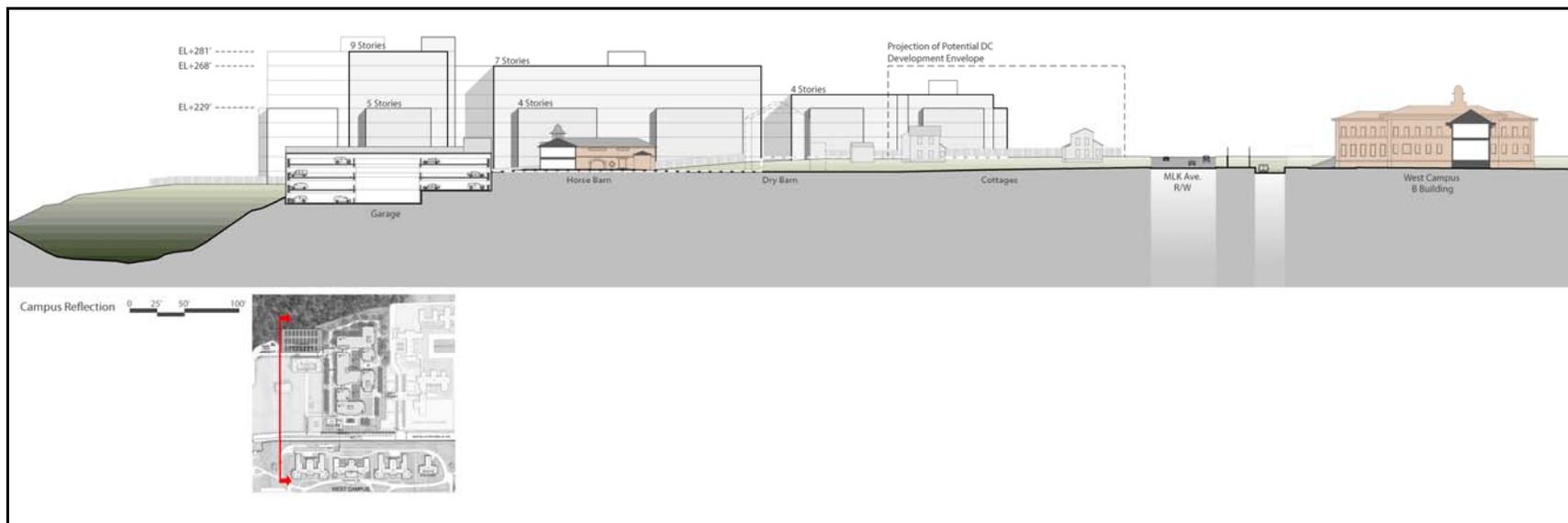
32 Under Alternative B, the FEMA facility would be organized into three separate office structures  
33 interconnected by glass bridges and organized around two central open courtyards. This results

1 in a campus setting that takes its cues from the organization of many of the historic buildings on  
2 the East and West Campuses of St. Elizabeths (see **Figure 3-5**). The height of the buildings  
3 would be up to four stories on the western side of the North Parcel near MLK Avenue and up  
4 to nine stories on the lower eastern side of the North Parcel. The height and massing of the  
5 eastern two structures increase from west to east on the site (see **Figure 3-7**). **Figure 3-8** shows  
6 a north-south section of the FEMA facility as seen from MLK Avenue and its relationship to  
7 buildings on the East Campus to its north and south. Most of the structures would have an  
8 east-west orientation, which is ideal for optimizing the use of daylight and energy efficiency, and  
9 also relates well to the direction of storm water flow, from west to east. The central open  
10 courtyards would be tiered from west to east in relation to the dropping topography of the site.  
11 Buildings could be linked below grade at these elevation drops to facilitate internal  
12 communication. The buildings would fit naturally on the site, in the topographic depression,  
13 minimizing the need to disturb existing topography and vegetation. No substantial  
14 constructability issues are apparent.

15 Employee parking would be located in a structure to the east of the Horse Barn, similar to  
16 Alternative A. Under Alternative B, a security fence and retaining wall would be separated from  
17 the east wall of the parking structure by 15 feet. A connecting inner and outer fence 20 feet  
18 apart would extend from the south of the garage and around the FEMA facility. The  
19 connections of the East and West Campuses below MLK Avenue, modifications to Pine Street  
20 and Pecan Street, and construction staging would also be similar to Alternative A.

### 21 **3.4.1.3 Alternative C: Atrium**

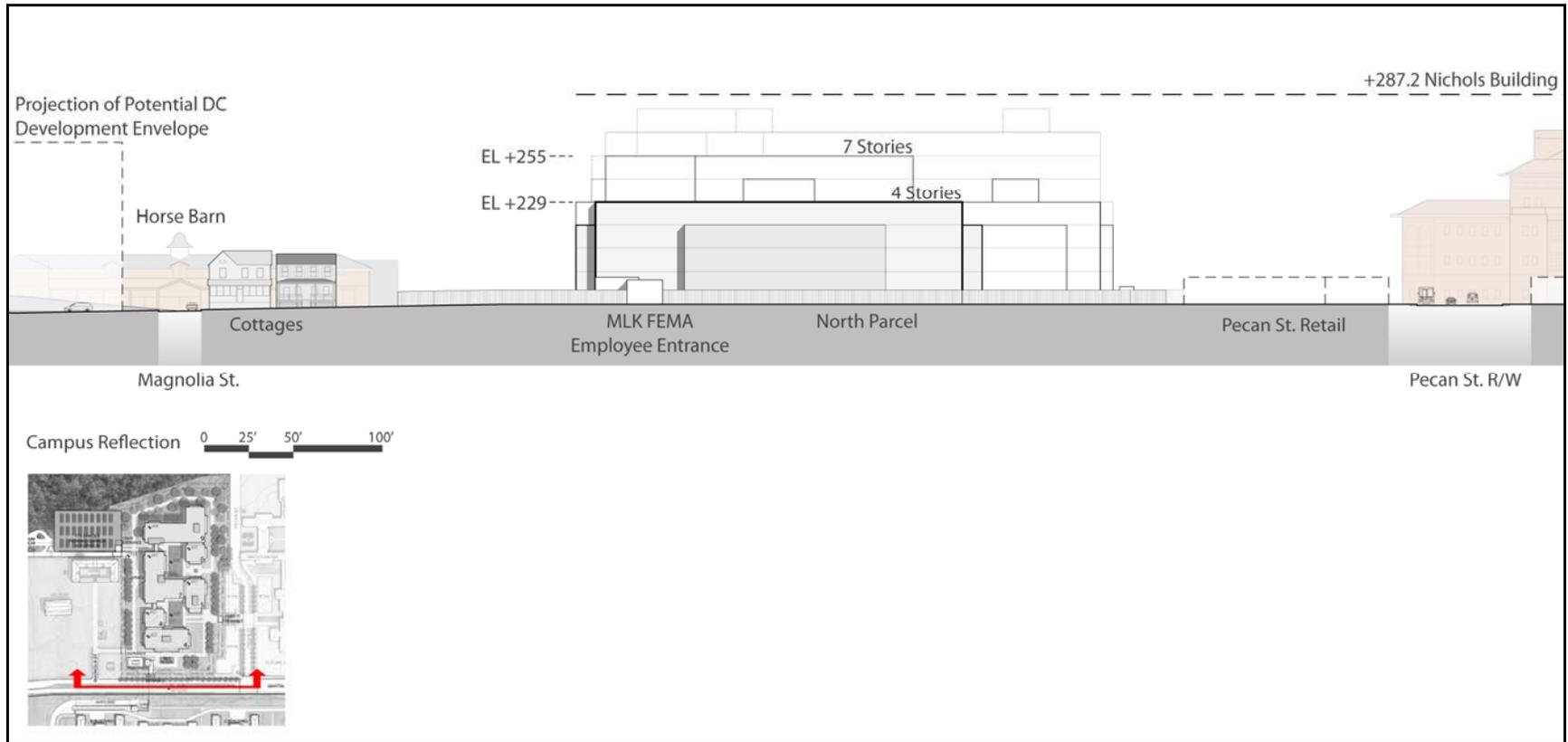
22 Under Alternative C, the FEMA facility would consist of one primary stepped and articulated  
23 spine office structure, oriented on an east-west axis (see **Figure 3-6**). On the southwestern side  
24 of this structure there would be four perpendicular north-south wings on the southern part of  
25 the site. These wings form three semi-enclosed courtyards facing south. At ground level, on the  
26 southwestern side of the spine building, would be a one-story atrium that would accommodate  
27 the principal east-west internal circulation that ties together the complex. The height of the  
28 building would be staggered from up to four stories on the western side of the North Parcel to  
29 up to eight stories on the lower eastern side of the North Parcel. Similarly, the four wings would  
30 increase in height from four to nine stories from west to east. Under Alternative C, the facility  
31 would be efficiently organized, and office interaction would be very high due to the compact  
32 nature of the scheme. The building would fit naturally on the site, in the topographic  
33 depression, minimizing the need to disturb existing topography and vegetation. No particular  
34 constructability or schedule issues are apparent.



1

2 Figure 3-7. East-West Site Section of Site Development Alternative B, Looking South

3



1  
2 Figure 3-8. North-South Site Section of Site Development Alternative B, Looking East

1 The parking structure would be located to the east of the Horse Barn, in the same location as in  
2 Alternatives A and B. The connections of the East and West Campuses below MLK Avenue,  
3 modifications to Pine Street and Pecan Street, and construction staging would also be similar to  
4 Alternatives A and B.

### 5 **3.4.2 Transportation Improvement Alternatives**

6 Reevaluation of transportation improvement alternatives in this EIS are a result of the  
7 St. Elizabeths TTR and include two alternatives for the improvements at the I-295/Malcolm X  
8 Avenue interchange and the proposed West Campus Access Road through Shepherd Parkway,  
9 two alternatives for the Firth Sterling Avenue/West Campus Access Road Intersection, and two  
10 alternatives for improvements along MLK Avenue. These transportation improvement  
11 alternatives were each addressed in the 2008 Final Master Plan EIS. However, further study by  
12 DDOT, FHWA, GSA, and DHS identified that the improvements required further refinement  
13 to improve traffic flow and to accommodate the projected traffic demand, which was  
14 documented in the St. Elizabeths TTR. Refinements included a larger I-295/Malcolm X  
15 Avenue interchange, accessing the interchange from further south on I-295 northbound,  
16 reconfiguration of alternatives for the Firth Sterling Avenue/West Campus Access Road  
17 intersection, and widening the existing right-of-way (ROW) for MLK Avenue in the vicinity of  
18 the St. Elizabeths Campus. Each transportation improvement has an Alternative 1 and an  
19 Alternative 2, but each improvement is interchangeable. For example, Firth Sterling  
20 Avenue/West Campus Access Road intersection Alternative 1 would work with either I-  
21 295/Malcolm X Avenue interchange and West Campus Access Road Alternative 1 or 2, or vice  
22 versa.

23 Although specific locations for temporary construction staging activities for the transportation  
24 improvements have not been identified at this time, staging activities would occur in open areas  
25 near the project sites such as within the existing cloverleaf at the I-295/Malcolm X Avenue  
26 interchange.

#### 27 **3.4.2.1 I-295/Malcolm X Avenue Interchange Expansion and Proposed West** 28 **Campus Access Road**

29 The construction footprint to accommodate improvements to the Malcolm X Avenue/I-295  
30 interchange would affect approximately 17.4 acres under Alternative 1 or 21.9 acres under  
31 Alternative 2 on combined DDOT ROW and NPS land primarily along the eastern side of I-295  
32 and south of Malcolm X Avenue. This would allow for an improved three-lane connection to  
33 the proposed West Campus Access Road from the I-295/Malcolm X Avenue interchange north

1 through the Shepherd Parkway and the western portion of the St. Elizabeths West Campus to  
2 the existing Firth Sterling Avenue intersection with Stevens Road. Two alternatives have been  
3 carried forward for analysis, as shown in **Figures 3-9** and **3-10**. Transportation Alternatives 1  
4 and 2 are relatively similar; the primary difference is the footprint for Alternative 2 extends  
5 farther to the east of the existing southeastern cloverleaf loop for eastbound Malcolm X  
6 Avenue-to-northbound I-295 traffic. In addition, Alternative 2 provides a ramp from  
7 southbound I-295 to connect directly with the West Campus Access Road on the east side of  
8 I-295. Under Transportation Alternative 1, access from southbound I-295 would occur via the  
9 Malcolm X Avenue exit, crossing under I-295, and then connecting with the West Campus  
10 Access Road. Under both alternatives, northbound I-295 traffic would exit the interstate south  
11 of where South Capitol Street crosses under I-295 onto the West Campus Access Road, and  
12 northbound traffic merging on to the West Campus Access Road from South Capitol Street  
13 would merge from the right.

14 Under both alternatives, approximately ten bus bays providing service to the West Campus  
15 would be constructed along the eastern side of the proposed West Campus Access Road  
16 between Gates 4 and 6. Buses serving this portion of the St. Elizabeths Campus would primarily  
17 be shuttles run between the West Campus and the Metrorail stations and local and express  
18 Metrobuses and commuter buses. There are two alternatives for the bus bays: a sawtooth  
19 option (see **Figure 3-11**) and a parallel option (see **Figure 3-12**). Sawtooth bus bays are offset  
20 from one another by connecting curb lines constructed at an angle from the travel lanes. This  
21 configuration minimizes the length parallel to the roadway needed for a bus to pull in and out,  
22 and generally allows for easier access for multiple buses along the curb (WSDOT 2010). Under  
23 the sawtooth bus bay alternative, 7 bays would be constructed between Gates 4 and 5, and  
24 3 bays would be constructed between Gates 5 and 6, for a total of 930 linear feet.

25 For the parallel bus bay alternative along the West Campus Access Road, 6 bays would be  
26 constructed between Gates 4 and 5, and 4 bays would be constructed at the between Gates 5  
27 and 6, for a total of 1,000 linear feet. Therefore, an additional 70 linear feet of land would be  
28 required to construct the parallel bus bays when compared to sawtooth bus bays.

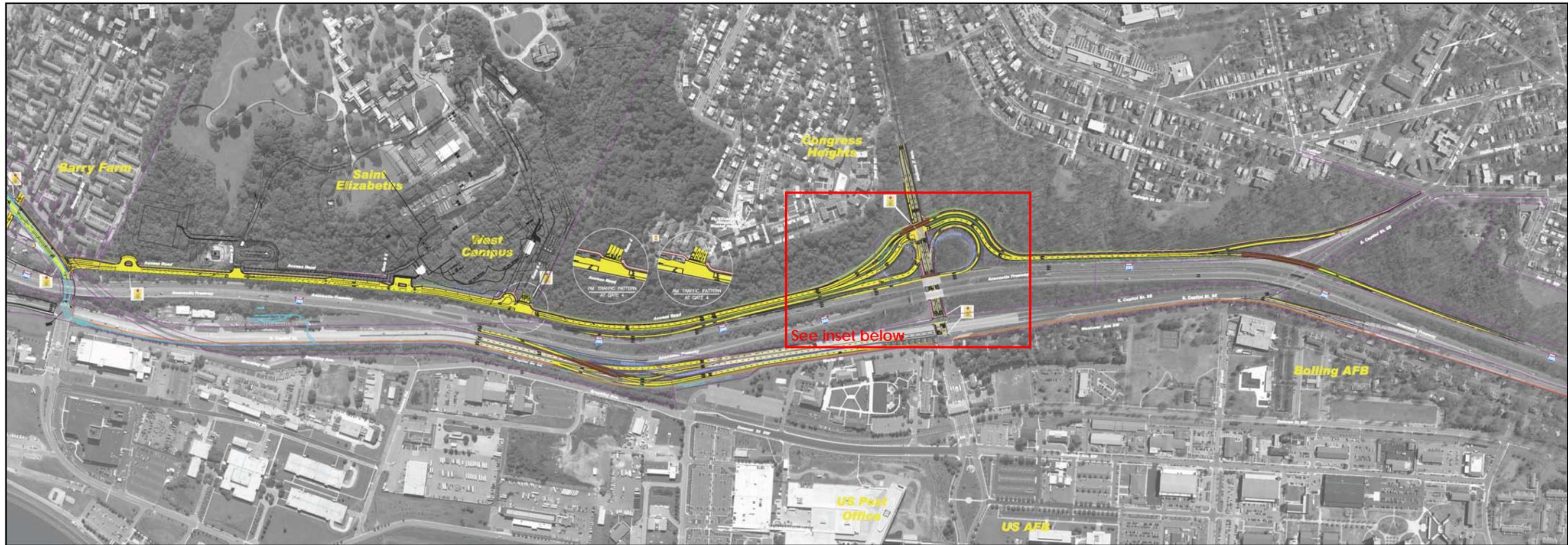
### 29 **3.4.2.2 Firth Sterling Avenue/West Campus Access Road Intersection** 30 **Improvements**

31 The construction footprint at the intersection of Firth Sterling Avenue/West Campus Access  
32 Road would be expanded to include minor modifications to the existing side streets southeast of  
33 a CSX railroad line paralleling Firth Sterling Avenue. Two alternatives for improvements to  
34 these side streets, Eaton Road, Stevens Road, and Firth Sterling Avenue access road, are shown

1 in **Figures 3-13** and **3-14**. The primary difference between these two alternatives is that under  
2 Transportation Alternative 1, the proposed West Campus Access Road would meet Firth  
3 Sterling Avenue in a “T” intersection. Cars would turn left from westbound Firth Sterling  
4 Avenue onto southbound West Campus Access Road, or continue straight through the  
5 intersection to remain on Firth Sterling Avenue. Under Transportation Alternative 2, cars would  
6 continue straight through this intersection to reach the West Campus Access Road, or turn right  
7 to continue on Firth Sterling Avenue. In addition, under Alternative 2, access to Stevens Road  
8 from Firth Sterling Avenue would remain. Under Alternative 1, Stevens Road would end at the  
9 Firth Sterling Avenue access road. Under both alternatives, Eaton Road would be extended  
10 across Firth Sterling Avenue to the northwest, through an existing vacant lot to be converted to  
11 a roadway, to connect with Barry Road. The intersection of Barry Road with Firth Sterling  
12 Avenue would be terminated and a cul-de-sac on Barry Road would be constructed.

### 13 **3.4.2.3 MLK Avenue Improvements**

14 Two alignment alternatives are proposed for MLK Avenue. Under Transportation Alternative  
15 1, MLK Avenue would be widened to allow for a 78-foot ROW for the roadway along the St.  
16 Elizabeths Campus, as shown in **Figure 3-15**. Improvements include two lanes in each  
17 direction, an additional turn lane, median, and sidewalks along MLK Avenue to service the St.  
18 Elizabeths Campus gates. Transportation Alternative 2 for MLK Avenue would have an 86-foot  
19 ROW and a slightly larger footprint on the St. Elizabeths East Campus than the first alternative  
20 because dedicated bicycle lanes would be included. Under both alternatives, the District of  
21 Columbia Office of Planning (DCOP) has requested an additional 13 feet be reserved for  
22 landscaped or hardscaped public space outside the security fence on the FEMA facility along  
23 MLK Avenue to accommodate pedestrian activities. South of the St. Elizabeth’s Campus, the  
24 new alignment of MLK Avenue in Congress Heights would consist of 90 feet of roadway and  
25 sidewalks, including five 10-foot travel lanes and two 8-foot parking lanes, with 4-foot planting  
26 strips and 8-foot sidewalks flanking the parking lanes. DDOT is requiring permanent street  
27 parking throughout Congress Heights. Design of these improvements would ensure that the  
28 public realm is maintained and accessible for pedestrian mobility. Additional traffic signals at  
29 the UCC entrance and at Pecan Street are proposed. The new signals would provide traffic  
30 calming along MLK Avenue and encourage pedestrian movement between the East and West  
31 campuses.



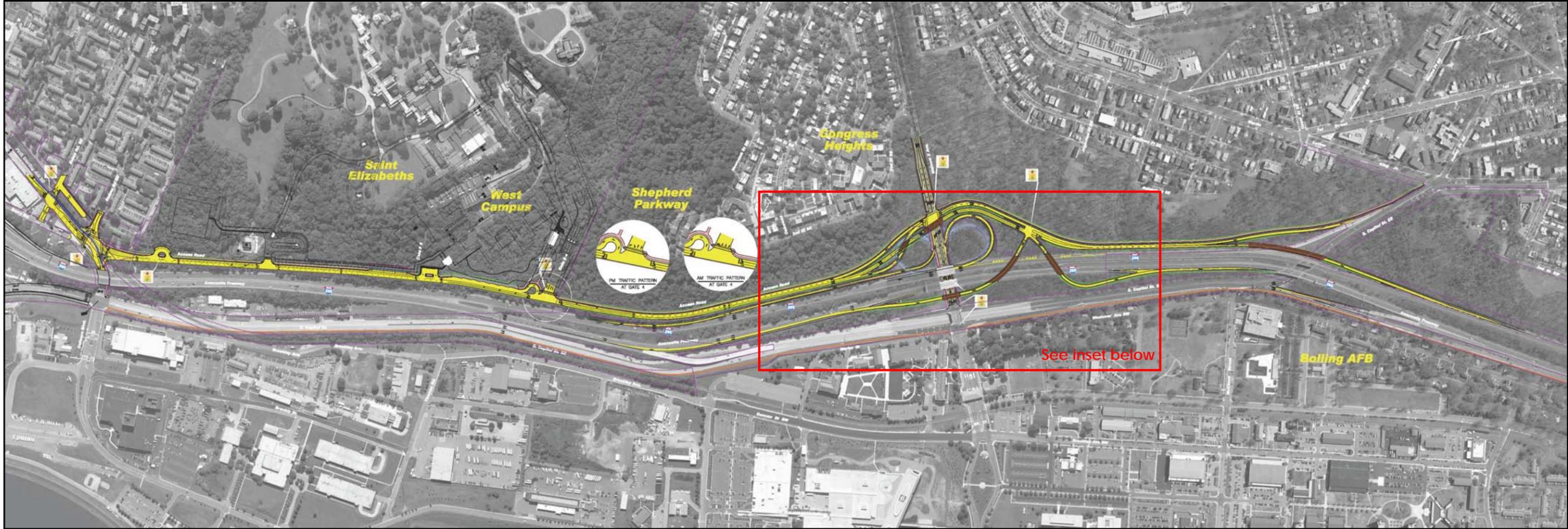
1  
2



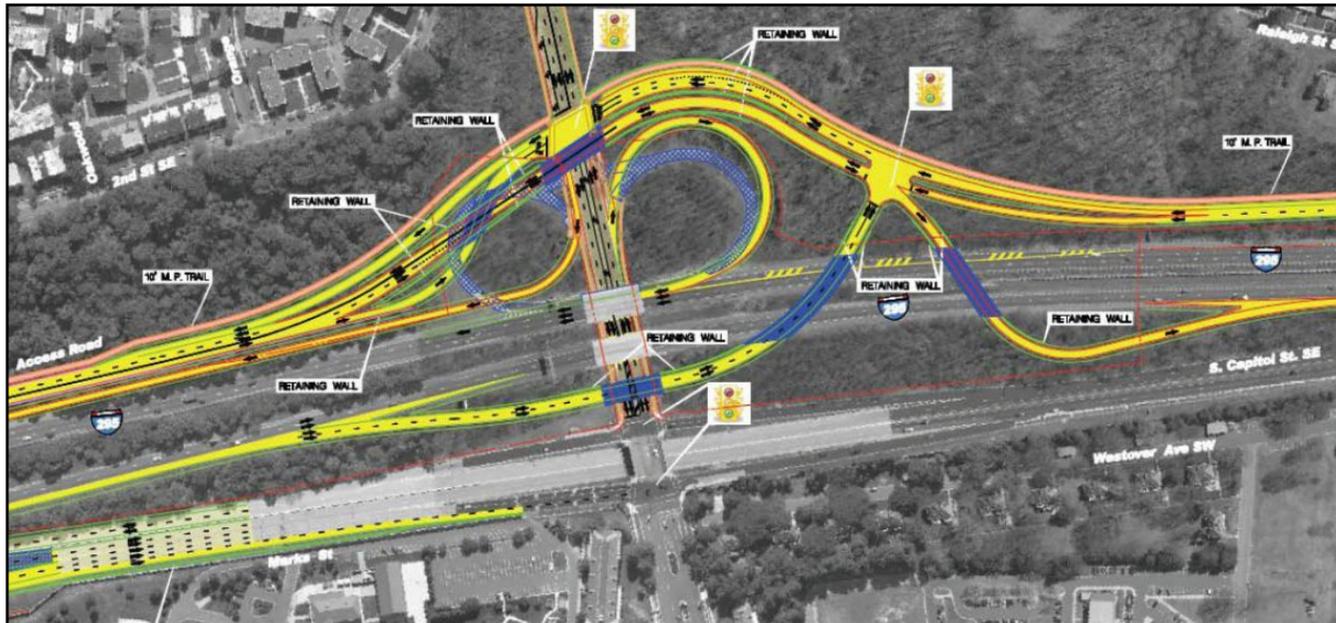
3  
4  
5  
6

Source: DDOT 2010. Note: Proposed transportation improvements shown on this map are conceptual and subject to change.

Figure 3-9. I-295/Malcolm X Avenue Interchange and West Campus Access Road Improvements Alternative 1



1  
2



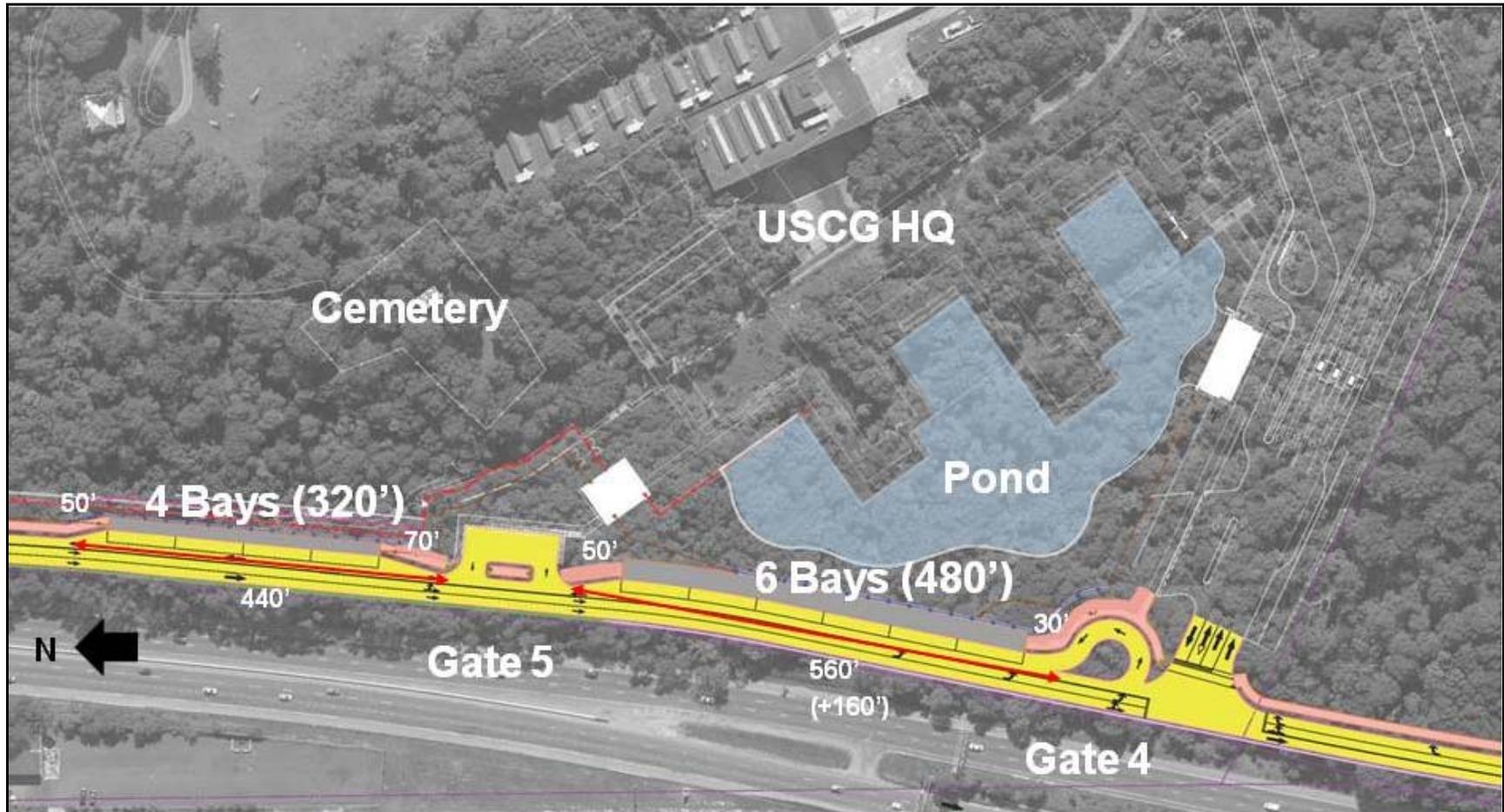
3  
4

Source: DDOT 2010. Note: Proposed transportation improvements shown on this map are conceptual and subject to change.

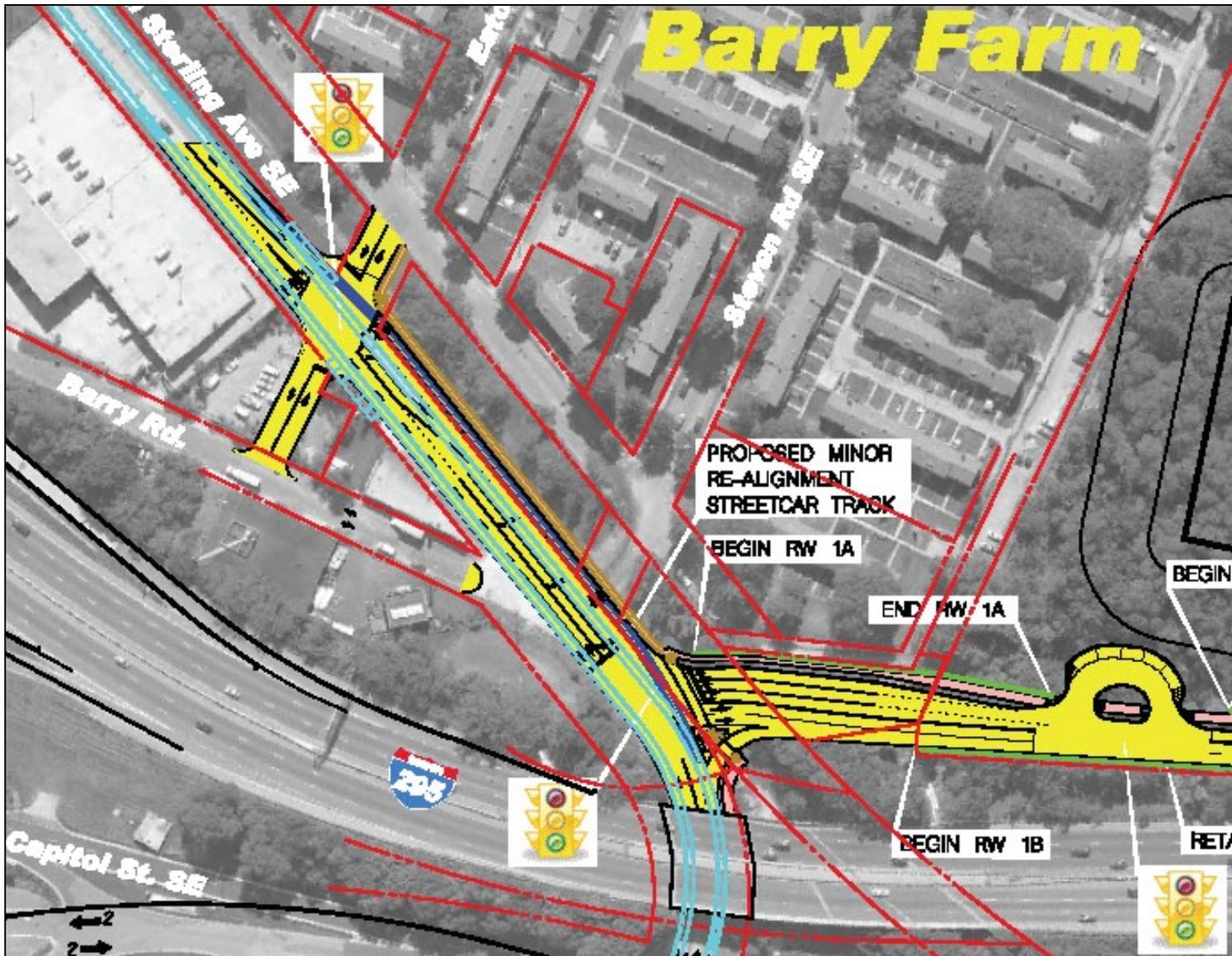
5 Figure 3-10. I-295/Malcolm X Avenue Interchange and West Campus Access Road Transportation Improvements Alternative 2



1  
2 Figure 3-11. West Campus Access Road Sawtooth Bus Bay Alternative  
3



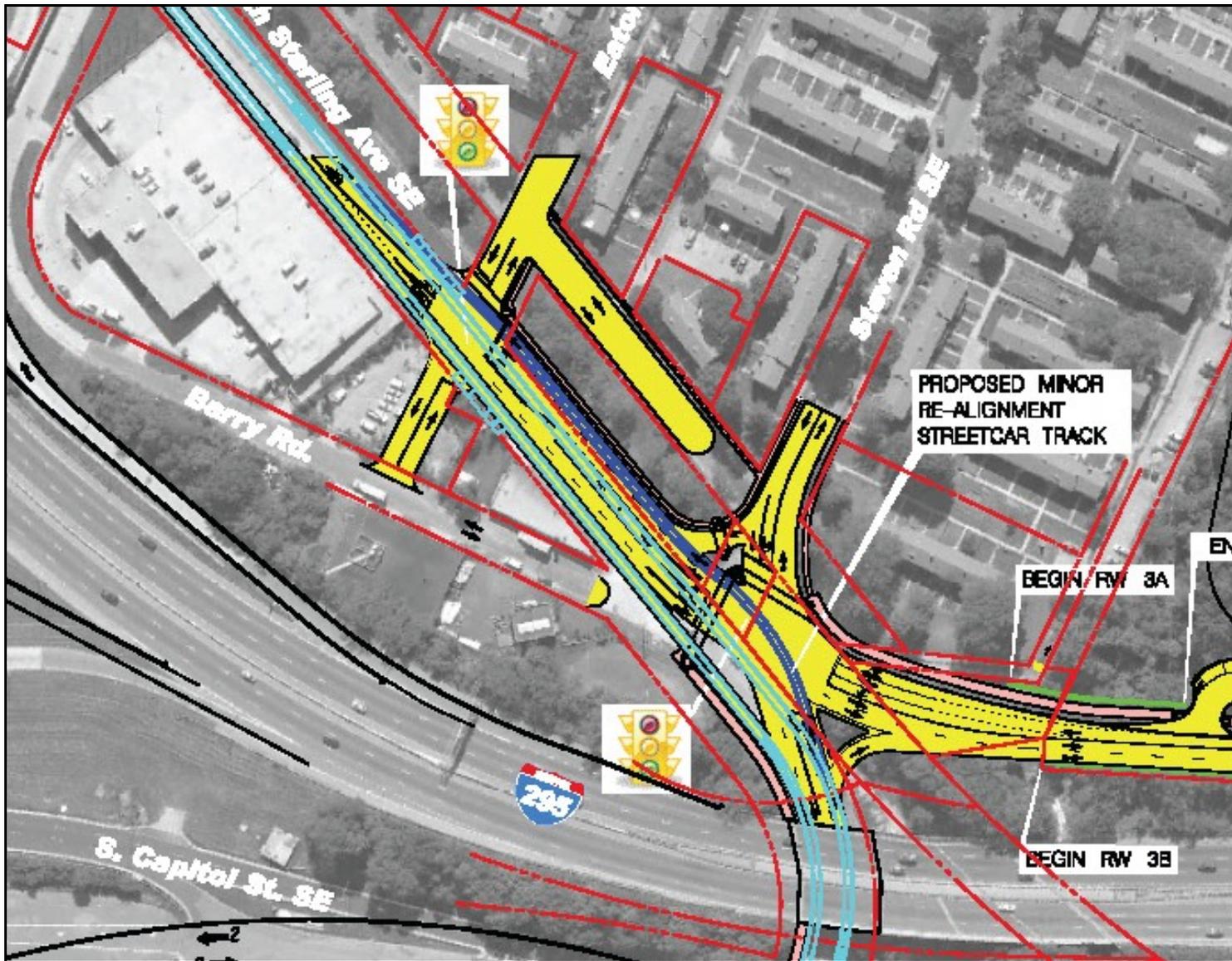
1  
2 Figure 3-12. West Campus Access Road Parallel Bus Bay Alternative  
3



1  
2 Source: DDOT 2010. Note: Proposed transportation improvements shown on this map are conceptual and subject to change.

3 Figure 3-13. Firth Sterling Avenue/West Campus Access Road Intersection Transportation Improvements Alternative 1

4



- 1
- 2 Source: DDOT 2010. Note: Proposed transportation improvements shown on this map are conceptual and subject to change.
- 3 **Figure 3-14. Firth Sterling Avenue/West Campus Access Road Intersection Transportation Improvements Alternative 2**



1  
2 Source: DDOT 2010. Note: Proposed transportation improvements shown on this map are conceptual and subject to change.

3 **Figure 3-15. MLK Avenue Improvements**

### 3.4.3 Alternatives Considered but Eliminated from Detailed Study

#### 3.4.3.1 Alternative Locations for FEMA

The DHS collocation plan (**Appendix A**) indicates that it is not a reasonable alternative for FEMA to be left at its current location because collocation with the DHS Headquarters is required to allow DHS to operate with improved command and control capabilities, increased integration, and more effective incident management in the preparation for and response to natural disasters or terrorist attacks. The FEMA National Response Coordination Center (NRCC) would be collocated with the other component operations centers and the DHS National Operations Center (NOC). In addition, collocation has already begun with the ongoing construction of the USCG Headquarters.

#### 3.4.3.2 North Parcel Site Development Alternatives

Other development options considered for the North Parcel but not carried forward as alternatives for further analysis in this EIS include several variations of those carried forth and retained. These options did not embody the site development elements described in **Section 3.4.1** as strongly as Alternatives A, B, and C. The eliminated options are as follows:

- **Option D (East West Spine).** The East West Spine option includes three predominantly rectangular buildings that would be situated with the long side of the buildings running parallel to MLK Avenue. The building closest to MLK Avenue would have a wing extending outwards towards the road to serve as a formal entrance to the structure. The three buildings would be connected at each level via a walkway in the middle of the buildings. A parking structure would be erected adjacent to the buildings and east of the existing Horse Barn.
- **Option E (Grid).** The Grid option consists of a long rectangular building paralleling MLK Avenue with three wide “V” shaped wings, together creating one continuous structure. Directly to the north of this structure would be a multi-use parking garage. The Grid layout is southeast of the Horse Barn.
- **Option F (Campus).** The Campus option is composed of five distinct building units connected via corridors. The Campus option would create a “U” shape around the Horse Barn. There would be a courtyard between the Horse Barn and the buildings. A parking garage containing 775 spaces would be situated to the southeast of the Campus to provide employee parking.
- **Option G (Courtyards).** The Courtyards option is characterized by two interior courtyards that are integrated into building design. From an aerial perspective, the

1 buildings look similar to the number symbol. The two extensions of the building that  
 2 run east to west extending towards MLK Avenue have a connecting corridor, creating an  
 3 additional interior courtyard. Parking for this design would be located to the northeast  
 4 of the buildings or east of the Horse Barn.

- 5 • **Option H (Two Towers).** The Two Towers design is distinguished by towers that  
 6 extend to the east from the larger building paralleling MLK Avenue. The Two Towers  
 7 design would be the tallest at approximately 12 stories tall. There would be an  
 8 employee-parking garage to the east of the facility.
- 9 • **Option I (Cluster).** The Cluster design is characterized by three structures clustered  
 10 around a central atrium, resulting in a very compact scheme allowing the parking  
 11 structure to be located directly to the east of the structures. Building heights would  
 12 range from seven to nine stories. The long axis of the principal structure (seven stories)  
 13 would face MLK Avenue. The heights and bulk of the structures could pose a design  
 14 challenge in relation to the nearby historic structures.

15 **Figure 3-16** shows the general layouts of the options eliminated from further analysis.

### 16 3.4.3.3 Transportation Improvement Alternatives

17 During the development of the transportation alternatives identified in **Section 3.4.2**, on  
 18 average three concepts for each intersection or corridor under consideration were developed and  
 19 evaluated. These concepts were refined through an iterative process based on input from GSA,  
 20 DHS, FHWA, DDOIT, and other interested parties. In addition to the transportation  
 21 improvement alternatives carried forth for analysis in **Section 5**, other alternatives considered  
 22 but eliminated from further study based on operational and safety considerations and DHS  
 23 program needs are presented as follows. Full descriptions of individual concepts for  
 24 intersections or corridors evaluated through this iterative process are provided in **Appendix C**.

- 25 • An alternative configuration for the I-295/Malcolm X Avenue interchange and the  
 26 proposed West Campus Access Road (identified as DDOIT Transportation Alternative B  
 27 in the St. Elizabeths TTR). Under this alternative, South Capitol Street would be  
 28 converted to a one-way southbound road and the West Campus Access Road would be  
 29 designed as a one-way northbound road on the opposite side of I-295. This alternative  
 30 was determined to be infeasible because of potential conflicts between DDOIT and DHS  
 31 during heightened security situations.



Option D (East West Spine)



Option E (Grid)



Option F (Campus)



Option G (Courtyards)



Option H (Two Towers)

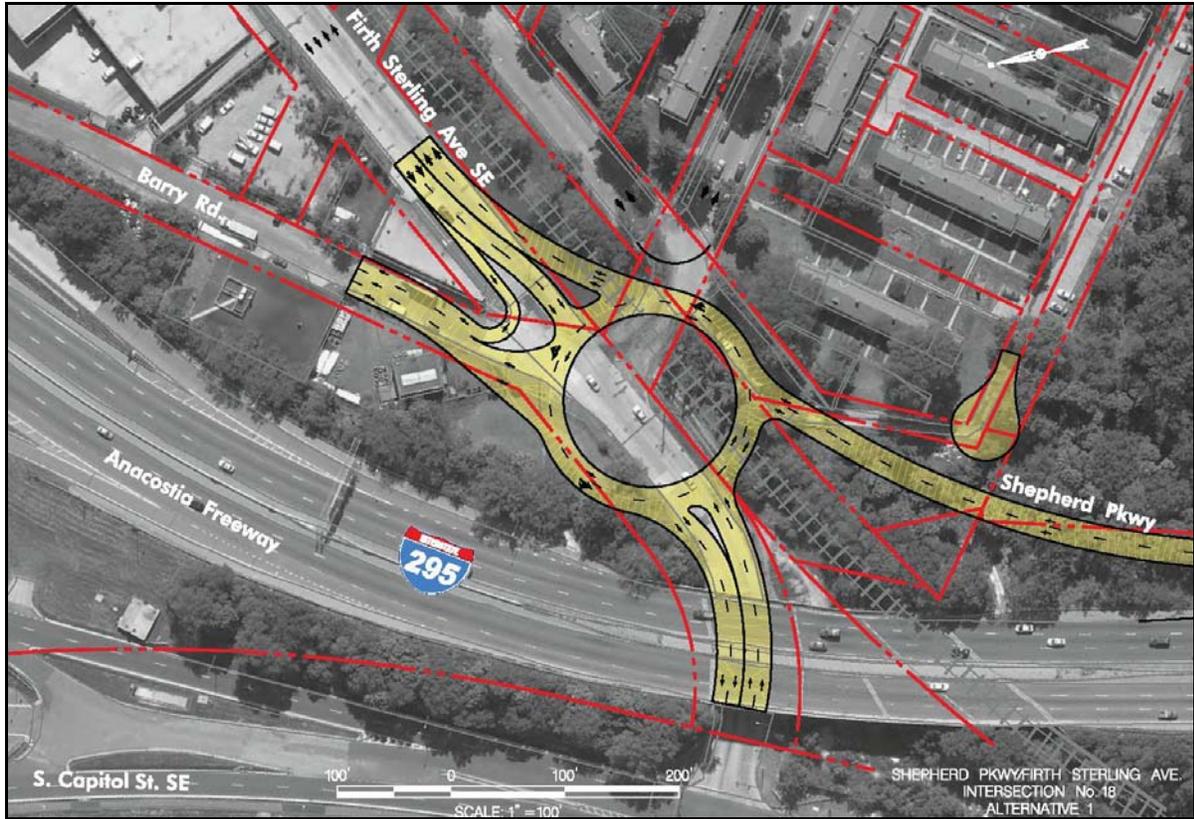


Option I (Cluster)

- 1 **Figure 3-16. Other North Parcel Development Options Considered but Eliminated from**
- 2 **Detailed Study**

- 1 • An alternative configuration for a roundabout at the Firth Sterling Avenue/West  
2 Campus Access Road intersection (also identified as Alternative B) (see **Figure 3-17**) was  
3 eliminated because the traffic circle would require extensive signalization to reduce  
4 conflicts between vehicles, pedestrians, and the Anacostia Streetcar line currently under  
5 construction (see **Section 5.10**). This amount of signalization would nullify the  
6 reasoning for a roundabout in the first place. This alternative would also require  
7 obtaining excessive CSX railroad property.
- 8 • A four-lane configuration for MLK Avenue (also identified as Alternative B for this  
9 transportation improvement) (see **Figure 3-18**) was eliminated because it did not  
10 provide a requisite dedicated median turn lane.
- 11 • A single access point to the West Campus from either Firth Sterling Avenue or a new  
12 gate on MLK Avenue was eliminated because, even with improvements, the volume of  
13 traffic created by the DHS consolidation at St. Elizabeths would cause nearby  
14 intersections along each of these roadways to fail.
- 15 • Direct access to the St. Elizabeths Campus from Suitland Parkway was eliminated  
16 because only 2 percent of the traffic accessing the St. Elizabeths West Campus would  
17 come from the Suitland Parkway, and security of the DHS facilities on St. Elizabeths  
18 would be compromised.
- 19 • Direct access to the St. Elizabeths Campus through Congress Heights was eliminated  
20 because this alternative would require the use of land from Shepherd Parkway and the  
21 West Campus, and would result in disproportionately high adverse impacts on the  
22 low-income, minority community of Congress Heights.

23 Alternatives to create a direct access from South Capitol Street or I-295 to the St.  
24 Elizabeths West Campus were studied to determine if the Shepherd Parkway could be  
25 avoided altogether. It would be necessary to provide fly-over ramps to create a direct  
26 access point on the West Campus, which would require unreasonable grades in excess of  
27 18 percent. Tunneling under I-295 would present similar engineering issues. A full-  
28 diamond interchange to a traffic circle bridged above I-295 would present unacceptable  
29 visual impacts. Direct and dedicated access from the in via the interstate system to a  
30 restricted area is in violation of American Association of State Highway and  
31 Transportation Officials (AASHTO) and DDOT design standards and FHWA and  
32 DDOT policy. These alternatives were eliminated due to safety concerns along I-295  
33 including weave issues at and south of the I-295/Malcolm X Avenue interchange.



1  
2 Figure 3-17. Firth Sterling Avenue/West Campus Access Road Intersection Roundabout  
3 Configuration (Alternative B) Considered but Eliminated from Detailed Study

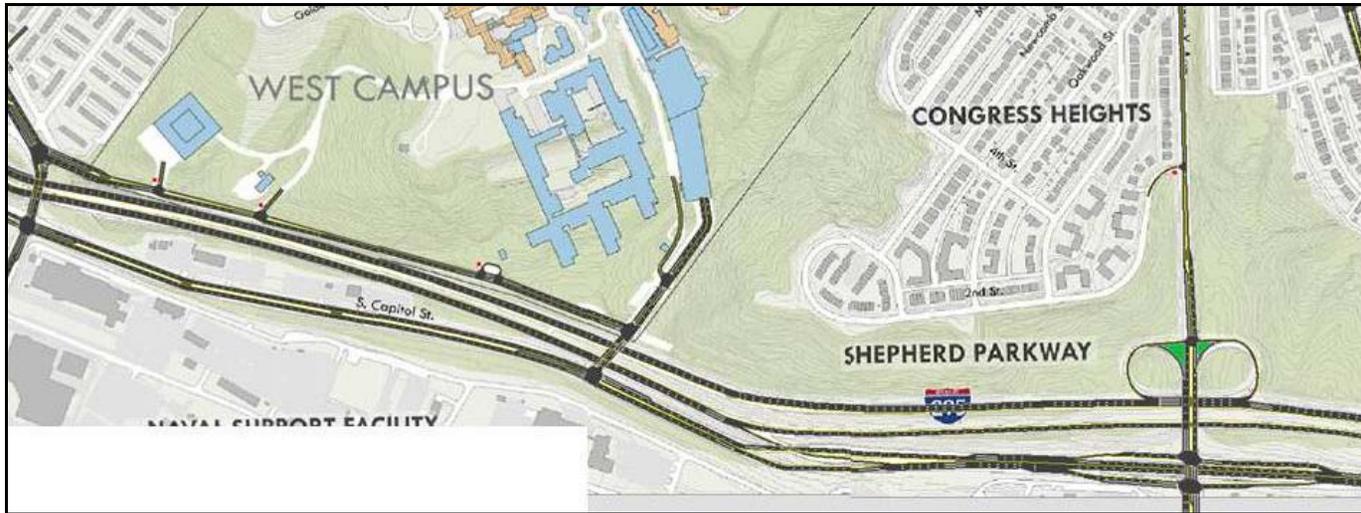


4  
5 Figure 3-18. MLK Avenue Four-lane Configuration (Alternative B) Considered but Eliminated  
6 from Detailed Study

1 There would also be significant and unacceptable traffic volumes at the Firth Sterling  
 2 Avenue/proposed West Campus Access Road intersection. Therefore, direct access  
 3 from South Capitol Street or I-295 to the St. Elizabeths West Campus was determined to  
 4 be not feasible and eliminated. **Figure 3-19** shows a configuration with direct access  
 5 from South Capitol Street across a bridge over I-295 to the West Campus with a two-  
 6 way West Campus Access Road from Firth Sterling Avenue ending at the bridge.  
 7 **Figure 3-20** shows a configuration with a similar bridge but with a one-way northbound  
 8 West Campus Access Road that would include an off-ramp to I-295 northbound.

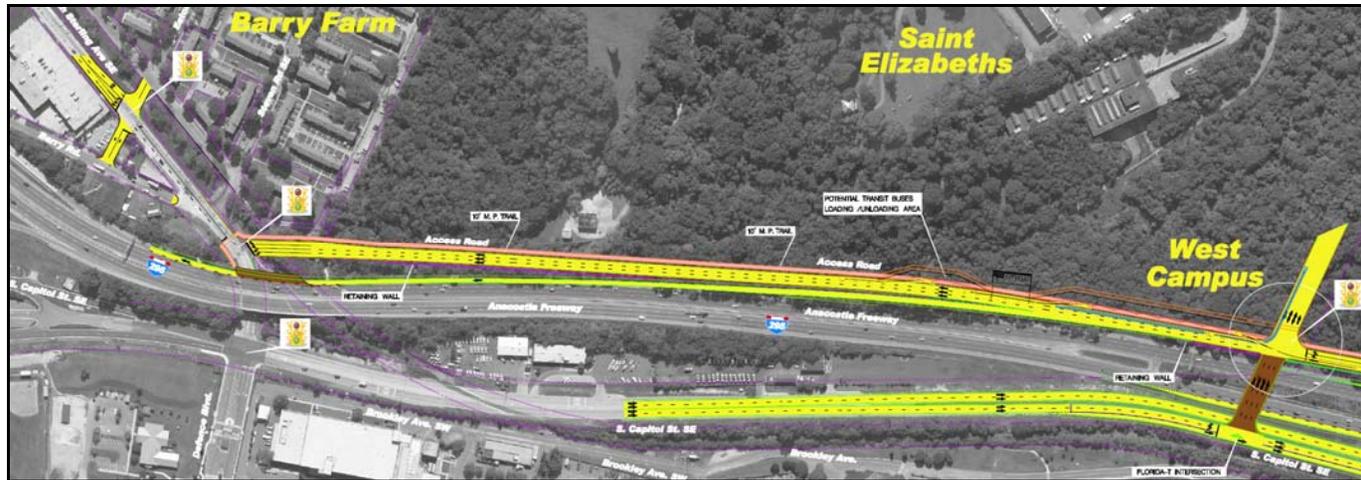
- 9 • An alternative configuration that would realign I-295 to the west and route the West  
 10 Campus Access Road on the original I-295 corridor (see **Figure 3-21**) was eliminated as  
 11 it would prohibit future abilities to expand I-295 capacity and it could not be constructed  
 12 before complete occupancy of St. Elizabeths by DHS in 2016.
- 13 • An alternative that swapped the locations of South Capitol Street and I-295 to avoid  
 14 Shepherd Parkway was eliminated due to geometric issues at Joint-Base Anacostia-  
 15 Bolling and the South Capitol Street/Suitland Parkway interchange, it could not be  
 16 constructed before complete occupancy of St. Elizabeths by DHS in 2016, and existing  
 17 interstate DDOT ROWs can only be used for interstate roadway infrastructure.
- 18 • Various other alternatives to provide access from these roadways to the St. Elizabeths  
 19 Campus were considered, including the following:
  - 20 ○ U-turn exit from the proposed West Campus Access Road to I-295 southbound
  - 21 ○ U-turn exit from South Capitol Street/Defense Boulevard to I-295
  - 22 ○ Ramp from Joint-Base Anacostia-Bolling over I-295 into the West Campus
  - 23 ○ Use of one reversible lane on the proposed West Campus Access Road  
 24 (assuming Transportation Improvement Alternative I-2 from the 2008 Final  
 25 Master Plan EIS)
  - 26 ○ Elevate access road on piers (e.g., viaduct) to eliminate retaining walls.

27 However, these alternatives or hybrids of these alternatives were eliminated primarily for  
 28 one or more of the following reasons: the alternative was not feasible due to excessive  
 29 vehicle delays and queue lengths, the alternative was not constructible and therefore not  
 30 feasible, the alternative would result in unacceptable adverse impacts on cultural  
 31 resources in the vicinity, or the alternative did not meet DHS access and operational  
 32 needs for the St. Elizabeths Campus (FHWA 2009).



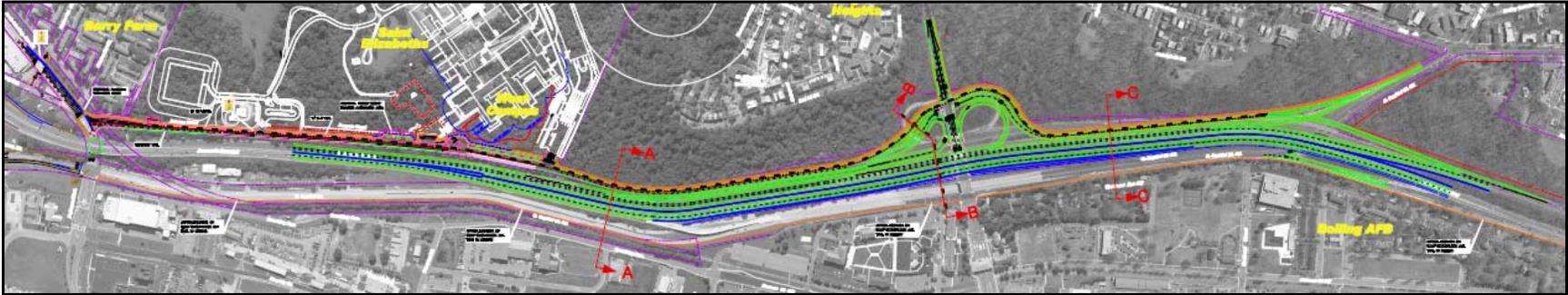
1  
2  
3

Figure 3-19. South Capitol Street Direct Access to the West Campus/Two-way West Campus Access Road Considered but Eliminated from Detailed Study



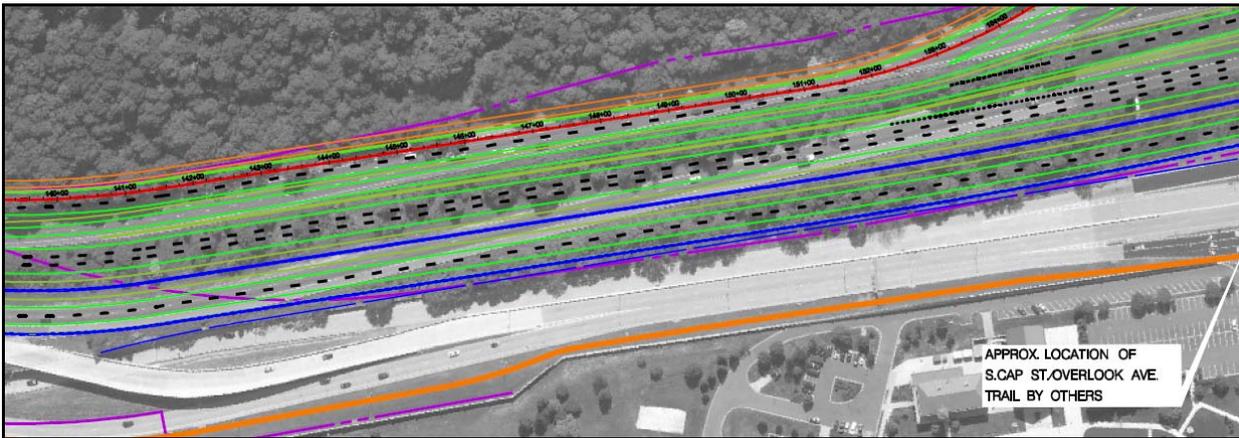
4  
5  
6

Figure 3-20. South Capitol Street Direct Access to the West Campus/One-way West Campus Access Road Considered but Eliminated from Detailed Study



1

2 Note: Inset below shows detail between profile lines A and B above.



3

4 Figure 3-21. Realignment Alternative Considered but Eliminated from Detailed Study that Involved Shifting I-295 to the West and  
5 Routing the West Campus Access Road on the Original I-295 Corridor

- 1       • Evaluation of sawtooth bus bays for Pecan Street on the East Campus determined that  
2       this option would not be conducive to the District of Columbia’s proposed site  
3       development along Pecan Street due to increased lane width requirements for this type  
4       of bus bays.
  
- 5       • Alternatives for different configurations of bus bays along the West Campus Access  
6       Road were considered. Bus bay alternatives eliminated included those that would require  
7       unacceptable bus bay widths, pedestrian walking times, impacts on cultural resources and  
8       visual resources, and retaining wall heights; and lack of ease of accessibility to all bus  
9       bays. Bus bay alternatives carried forth for further analysis are discussed in **Section**  
10      **3.4.2.1.**

### 11   **3.4.4      Identification of the Preferred Alternative**

12   In accordance with 40 CFR 1502.14(e), which requires that a preferred alternative be identified  
13   in this Draft EIS, the preferred alternative for development of the St. Elizabeths East Campus  
14   North Parcel is Alternative B (Campus Reflection) for the East Campus North Parcel  
15   development. The preferred alternative for bus bays along the West Campus Access Road is  
16   sawtooth bus bays. GSA does not have decisionmaking authority over the Transportation  
17   Improvement Alternatives, but would continue to coordinate with DDOT, FHWA, and other  
18   agencies to identify the preferred alternatives for these improvements.