

Appendix F – Comments and Responses on the Draft EA

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From: [Paul Gyamfi - WPDBA](#)
To: [Estes, Liz](#); [Courtney Benton - WPIA](#); [Marshall Popkin - WPDBA](#); [Rodney Moulden \(WPDA\)](#); [Tom Terrio - WPDBA](#); [Catherine, Adam](#); [Richard Sedwick - WPXBB](#)
Subject: Fwd: General Services Administration (GSA) Environmental Assessment (EA)/National Environmental Policy Act (NEPA) letter
Date: Wednesday, July 22, 2020 12:06:06 PM
Attachments: [BLS Draft EA 06-26-2020 508.pdf](#)

BLS EA comment from the Navy

Thank you.
Paul.

Paul Gyamfi
Senior NEPA Compliance Specialist
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National Capital Region
Public Buildings Services
Office of Planning and Design Quality
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----- Forwarded message -----

From: Noles, Danny L CAPT USN ONI WASHINGTON DC (USA)
<danny.l.noles@navy.mil>
Date: Wed, Jul 22, 2020 at 12:01 PM
Subject: General Services Administration (GSA) Environmental Assessment (EA)/National Environmental Policy Act (NEPA) letter
To: Paul.gyamfi@gsa.gov <Paul.gyamfi@gsa.gov>
Cc: Wright, Phyllis J CIV (USA) <phyllis.wright@navy.mil>

Mr. Gyamfi,

The National Maritime Intelligence Center (NMIC), as a stakeholder of 42 acres located at the Suitland Federal Center (SFC) has the following comments regarding the General Services Administration (GSA) Environmental Assessment (EA)/National Environmental Policy Act (NEPA) letter and the draft EA found online.

NMIC leadership has a concern of adding 1800 personnel from the Department of Labor-Bureau of Labor Statistics (DOL-BLS) into the existing Census Bureau facility due to the

severe shortage of parking at the SFC. The draft EA does not address the need for new parking to accommodate the increase of BLS usage. Does the existing Census garage have sufficient capacity to absorb this new demand called out in the draft EA? The NMIC will be utilizing a majority of available GSA SFC surface lots through a Memorandum of Agreement (MOA) for the foreseeable future; the NMIC parking garage is slated for demolition and subsequent replacement of surface parking only.

The draft EA (para. 3.7.4) does a great job of explaining the use of the Metro stop adjacent to the SFC. We concur this station is only conducive to embarkation to the downtown DC area versus a debarkation station for the SFC. The vast majority of the SFC employees commute via Privately Owned Vehicles (POV) due to lack of available expeditious public transportation. This challenge needs to be addressed by the National Capital Planning Commission (NCPC) for appropriate parking to employee ratio for the entire SFC workforce.

2

The draft EA (section 3.7) does a good job of evaluating the increased POV traffic at the SFC and feeder routes to the compound, the need for additional manning at the SFC gates (during peak commute hours), but does not address the need for an SFC shuttle service with associated costs shared by all SFC tenants, or the increased demand for improvements (e.g. seal coating, re-paving, re-stripping) to the existing SFC roadways. Additionally the NMIC requests a copy of the updated GSA Traffic Management Plan (TMP) referred to in the draft EA Appendix E.

3

The draft EA (para. 3.2.7), due to the influx of additional personnel to the SFC, should also consider improvements and maintenance to the SFC outside recreational areas, and the need to remove the dilapidated, abandon, safety hazard NIC-2 building located across Swann road from the NMIC.

4

The draft EA (section 3.16) should include (as described previously) the need to demolish NIC-2, improve roadways, improve on-campus recreational areas, and, if needed make improvements to SFC parking (e.g. turn the NIC-2 building footprint into surface parking).

5

While NMIC leadership does not oppose the DOL-BLS personnel addition to the SFC or the draft EA, the above investments and considerations by GSA are paramount.

If you have questions or would like to engage further on the above parking/POV traffic issues, my POC is Ms. Phyllis Wright, cc'd above.

r/ Captain Danny Noles

CAPT Danny L. Noles

Chief of Staff

Office of Naval Intelligence

301-669-5727 (Office)

703-310-8743 (cell/teleworking)

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National Maritime Intelligence Center July 22, 2020 – Danny J. Noles

Comment 1: Parking for proposed BLS employees will be accommodated when the NMIC parking lease expires in 2022. Also, the north and south parking garages provide spaces for tenants in the Census/BEA Building. A parking assessment was not able to be conducted prior to COVID-19 restrictions. It may need to be deferred until after COVID in order to get a more accurate count of existing parking demand, particularly if we see a higher work from home percentage post-COVID, and how that compares to potential demand as well as NCPC parking ratio requirements. Furthermore, a robust set of transportation demand management strategies is recommended in the TMP to reduce single-occupancy vehicle trips across the campus.

Comment 2: Comment noted.

Comment 3: The TMP includes a recommendation for a campus-wide shuttle. However, maintenance of SFC roadways is not an item that would be recommended in a TIS or TMP as it is assumed that maintenance activities will be done as needed.

Comment 4: comment noted.

Comment 5: The TMP and TIS include recommendations for new infrastructure. However, as noted in the previous comment response, the TMP or TIS does not include maintenance items. Maintenance such as resurfacing and restriping are assumed to be scheduled as needed and not necessarily as a result of this proposed action. The proposal to demolish SFC 2 was put on hold due to funding constraints. As part of GSA's Master Planning for the SFC, future use of the property will be re-examined.

DATE: July 30, 2020

MEMORANDUM FOR GENERAL SERVICES ADMINISTRATION (GSA)

Gregory B. Green

FROM: GREGORY B. GREEN II
Local 12 Acting BLS Agency Vice President

SUBJECT: AFGE Local 12's Concerns in GSA's Draft Environmental Assessment Regarding the Bureau of Labor Statistics' Relocation

Executive Summary

This letter is in response to GSA's draft Environmental Assessment regarding the Bureau of Labor Statistics Relocation. The following members of AFGE Local 12 LaRhonda Gamble Local 12 President, Stephanie Graf Local 12 Head Steward, Gregory B. Green II Acting Agency Vice President BLS, William Lawton BLS, Jean Fox BLS, Michael Jadoo BLS, and Mathew Willis BLS, reviewed the GSA Environmental Assessment and found several items to be of concern to the Bureau of Labor Statistics (BLS) Bargaining Unit Employees. The major concerns are as follows:

- In the alternative cases discussion, there is no mention of the size of the Postal Square Building (PSB) footprint as it compares to the 367,000 square feet at the Suitland Federal Center (SFC). The main concern is that in the alternatives discussion the larger current PSB footprint is being compared to the 40 percent smaller footprint at the SFC. 1
- Given the current pandemic situation, there is no discussion of additional safety features needed to keep the staff healthy, such as additional ventilation (and how that would impact the environment), or whether such a significant reduction in space will be safe for the employees. 2
- The assessment does not indicate where the BLS space will fit into the current SFC complex and which space will be lost by the Census Bureau and Bureau of Economic Analysis. 3
- No alternative besides moving the SFC or staying in the current location was considered. 4

- Safety of employees entering and exiting the SFC is a major concern. 5
- Traffic is already over capacity in the local area and on campus, and the addition of BLS employees will make the congestion significantly worse during peak travel time. 6
- Available parking is less than the total demand in the area and the influx of BLS employees will degrade service to all employees at SFC. 7
- Agreements with currently housed agency employees may prevent BLS employees from receiving an equitable distribution of parking based on the employment levels and number of workers needing to enter the facilities. 8

Detailed Section Information

Section 1.0

Section 1.1 – Proposal

The feasibility study to shift BLS employees to the SFC has not been shared with AFGE Local 12. There are concerns that BLS will not fit into 367,000 rentable square feet, and if it can, that there are not 367,000 rentable Square Feet available at the SFC without creating an undue burden on employees of the current occupants as well as the relocated BLS employees. 9

Section 1.2 – Purpose of the Relocation

This section states that the purpose of the relocation is “the achievement of more efficient utilization rates for all three Federal organizations, and reduce rental payments made by BLS, Census, and BEA.” BLS could achieve a more efficient utilization rate by reducing our footprint at PSB. 10

In order to determine the actual impact, a detailed cost comparison for the RSF should be completed and shared with Local 12. Assuming a reduction to 367,000 RSF at the PSB, what is the cost differential? Does the comparison include the savings from not needing to shift workers and equipment to SFC? 11

Section 1.3 – Why Relocation is Needed

The need for the move is based on a mandate to reduce the footprint of BLS which can be achieved in the current space. We are concerned that better use of the current space was not included in this assessment. There are already multiple tenants at the PSB. A 40 percent reduction in space would allow for additional occupants in the current space. 12

However, given the current pandemic situation, which requires social distancing to stay safe, we would not want to severely reduce our footprint without knowing that this will keep our staff healthy. 13

Additionally, the discussion does not indicate how employees' interactions with the rest of the Department of Labor will be affected by the move to the SFC. There are no assurances in this document that employees will not be reassigned within DOL or to another agency as part of this move.

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Section 1.4 – Relevant Laws

15

No concerns at this time, as this is the justification for the assessment.

Section 2.0 – Alternatives Considered

Section 2.1

There was “an evaluation of the BLS program of requirements” which “reduces BLS” overall program footprint by approximately 40%.” There are 367,000 rentable square feet available in the SFC, which would appear to accommodate BLS. The assessment does not say who did the outside evaluation or what metrics were used to determine that there would be enough space, and does not provide the reports as evidence.

16

Section 2.2 - Alternatives

Section 2.2.1 – “No Action Alternative” –To follow this alternative, our lease would need to be renegotiated. They report that “The cost increase from rent in this area **may** place additional burden on BLS’ projected budget allocation for housing.” (emphasis added) The assessment does not provide any details or evidence or price quotes were requested. Additionally, the assessment does not detail the size and scope of the no action alternative. Are the RSF in each case equal?

17

Section 2.2.2 – The alternative considered by GSA – The only alternative considered was moving to SFC. No other alternatives seem to have been considered, including decreasing the space used at PSB or moving to FPB. This prevents like to like comparisons and potentially skews the assessment in favor of relocation. The outline and assessment does not outline that a consideration of increased telework would relieve the statements of increased costs should the Agency choose to find nearby accommodations for the BLS employees whose jobs are not portable.

18

Section 3.0 – Environmental Impacts

Section 3.1

This section describes the scope of the environmental analysis. There are no concerns for this section.

19

Section 3.2

Sections 3.2.1 to 3.2.8 and 3.2.10 to 3.2.11 – Environmental Factors

Because this is a shift to an existing facility, there are no concerns related to most environmental factors.

20

Section 3.2.9 - Climate Change

The climate change factor discussion is limited to construction activities. It is a concern that the additional traffic could lead to the release of extra emissions which increases the amount of greenhouse gasses in the area of SFC. More staff will be driving, and they will be driving a farther distance than their current commute. We believe that the potential increase in greenhouse gases should be included in this section.

21

Section 3.2.12 - Population and Housing

Does the analysis include both new as well as current housing in the discussion of population? If there is a “discernible” increase in people moving to the area, cost of living in the area would likely increase as well.

22

Section 3.2.13 and 3.2.14 - Environmental Justice and Contamination

No concerns at this time.

23

Section 3.3 – Issues that were studied in this report

No concerns at this time as the list of factors seems to be complete.

24

Section 3.4 – Economy and Employment

The estimates don't match up with what it reported on the Maryland commerce site but it is close in value. See <https://commerce.maryland.gov/about/rankings-and-statistics/data-explorer>

25

Section 3.5 – Community Facilities and Services

No concerns at this time.

26

Section 3.6 - Safety and Security

Section 3.6.1 -- What Safety and Security Measures are Currently Provided at the Suitland Federal Center Campus?

This section says that X-ray machines are used by DHS guards to scan the vehicles of all visitors accessing the SFCC. How is this scanning done? Are these drive-through scanners? No details were provided to address these two questions.

27

Section 3.6.2 -- Fire, Emergency Medical Services, and Police near SFC

They report that the crime rates are decreasing in the local area, except for sex offenses, which are up. In addition, although the numbers are decreasing overall, they report that within the local police “beat” which includes SFC, there were 5 homicides in 2017, 1 in 2018, and 0 in 2019. Within the wider police “district” surrounding SFC, there were 11 homicides in 2017, 4 in 2018, and 8 in 2019. So there have been some violent crimes in the area. They do not report on the crime rates around the Postal Square Building, so we can't make comparisons.

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Section 3.6.3 -- Impact of the proposed relocation on safety and security in the area

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The section says that employees at SFC would face reduced likelihood of crime due to measures put in place. They do not report on the crime rates around the Postal Square Building, so we can't make comparisons.

Section 3.6.4 -- Impact of the proposed relocation on Police, Fire, and EMS

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The increase in employees at SFC could lead to a potential increase in incidents requiring assistance from the local and Metro police. They say this could require additional police deployments for both agencies. The report says there will be a "long-term, minor, adverse impact," and they do not actually recommend any increases in police deployments.

Section 3.7 – Traffic and Transportation

There are a number of issues related to traffic and transportation that need to be addressed to provide reasonable and safe transportation options for employees of BLS and other agencies on the campus.

One of the largest concerns for BLS staff about the relocation is the increase in their commute time. It would significantly impact their work-life balance, for many in a way that would be untenable, which will likely lead to a loss of staff. The GSA survey of BLS staff indicates that 86.91% of the BLS staff would have a longer commute, with almost half adding 30 minutes or more each way, and an additional 16.11% adding more than an hour *each way* to their commute. That is 66% of the BLS staff (or 1,188 employees) who could expect to add at least 1 to 2 *hours each day* to their commute. This is likely unsustainable for many of these employees.

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The authors reports conclude that: "There will be a significant need to encourage commuting by modes other than driving alone." It is imperative that improvements are made to alleviate the burden for BLS staff commuting to the Suitland campus.

Sections 3.7.1 to 3.7.2 - Definition and assessment guidelines

32

No concerns at this time.

Section 3.7.3 - Impact of increased automobile commuters

There are four main concerns in this section.

- **The facilities may not be able to handle the additional traffic, especially during an emergency or weather incident.** In the survey of Census and BEA staff, many respondents indicated that Campus traffic circulation is extremely frustrating, especially in the afternoon, due to the configuration of the entrance/exit, and adjacent traffic signal operations. Further, some cited a weather-related incident in January 2020 that closed the Campus early, where the subsequent departure caused traffic jams lasting a few hours as a result of these factors. The additional traffic of the BLS commuters would only exacerbate this problem, potentially putting all the employees at risk if they are leaving because of an emergency.

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- **The addition of BLS drivers will only make a bad local traffic situation worse.** The report notes that relocating BLS would increase the delays at three intersections in the morning commute and six in the evening. The report in Appendix E concludes that “The results of the TIS show that the relocation of 1,800 BLS employees to the SFC [based on pre-covid data] would have an adverse impact on traffic conditions at seven of the 18 study area intersections, requiring mitigation measures that include signal timing adjustments, additional turn lanes, a new signalized intersection, and modifications to the Suitland Parkway interchange.”
- **There does not appear to be enough parking for BLS staff.** Employees from the Census and BEA report that parking can already be difficult, especially for those arriving after 9 AM. Also, the National Maritime Intelligence Center (NMIC) notes that they will be utilizing a majority of available GSA surface lots through a Memorandum of Agreement (MOA) for the foreseeable future, and that the NMIC parking garage is slated for demolition and will be replaced by surface parking only.
- **The total number of trips into and out of the campus during rush hour may be underestimated.** With an estimated 58% of the 1,800 BLS staff members driving to work, that would be as many as an additional 1,044 cars. However, the authors apply a discount that they do not fully explain, which leads them to conclude that there will only be an additional 321 trips in during the morning rush hour and 334 trips out during the afternoon rush hour, significantly fewer than 1,044. Given that issues such as telework have not been worked out, the facilities need to accommodate all of the potential drivers. If the number of trips is, in fact, underestimated, then the issues listed above would be even worse.

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Sections 3.7.4 to 3.7.5 – Public transportation

Because Suitland is at the end of the Green line, the report authors expect that most trips would be “reverse commute trips.” However, this may not be accurate, as many people will have to commute into DC in order to come back out again. For example, anyone who takes VRE or MARC to Union Station would have to take the Red line into the center of DC before embarking on the “reverse commute” portion of their trip. The only people for whom this would be an entirely reverse commute would be those who live between Suitland and DC.

37

One option the authors recommend to address the challenges of commuting is a shuttle between a downtown DC Metro stop and the SFC campus. This is something that BLS staff have requested in informal conversations, but the authors recommend this improvement on a 5-10 year timeline. It is not clear why it would take so long to establish a shuttle service that would benefit so many employees.

Sections 3.7.6 to 3.7.7 – Biking and walking

There are some paths and lanes for biking and walking. However, they are not conducive to biking or walking. The sidewalks are narrow and close to the street where cars drive by quickly, and the bike lanes are shared with the automobile traffic.

38

The improvements to provide safe and usable pathways for pedestrians and bicyclists recommended by the authors are critical to provide a safe environment for pedestrians and bicyclists.

Sections 3.7.8 – Overall improvement to the transportation network

There are a number of recommendations listed here to help improve the commute for BLS staff should they be relocated to SFC. It is imperative that these and other improvements as needed be made to provide a reasonable commute for BLS staff.

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Section 3.8 – Air Quality

Emissions during construction and vehicle emissions are the major adverse impacts. Unfortunately, there is no plan to mitigate the traffic concerns.

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Section 3.9 – Utilities

No concerns at this time.

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Section 3.10 – Waste Management

BLS relocation likely to have minimal effect.

42

Section 3.11 – Cumulative Effects

This section considers the cumulative impacts of this project alongside the previous projects on the site and the potential future projects. The report covers the following topics:

- Economy and Employment - significant benefits to SFC area, but does not discuss the scale of negative effects near the PSB. There is also a substantial loss of amenities and available purchasing options for BLS employees who are used to the numerous businesses within a short distance of the PSB.
- Community Facilities and Services - no concerns
- Safety and Security - Section notes that security is sufficient but crime near the SFC is still of concern to BLS employees who would need to be in the area.
- Traffic and Transportation - This section reiterates the problems of driving, parking, and taking the metro described in previous sections..
- Air Quality, Utilities, and Waste Management - minimal effects.

43

Section 3.12 – Unavoidable Adverse Environmental Impacts

We agree with the findings in the assessment which identifies numerous adverse environmental impacts, including increased demand on utility services, community facilities, and waste management. There would also be negative impacts on traffic and air quality in the area as a result of the increase in the number of people driving to the facility.

44

Section 3.13 – Short Term vs Long Term Benefits

45

No concerns at this time.

Section 3.14 - Any Irreversible and Irretrievable Commitments of Resources

46

No argument or evidence is offered to support this speculation: “it is anticipated the proposed BLS relocation would ultimately require a lower expenditure of funds, energy, and fuel than presently committed under the existing leased facilities...”

Section 3.15 – Summary of all the impacts of the “No Action Alternative” vs the relocation

47

No additional concerns at this time, as they were all addressed in previous sections.

Section 3.16 – Mitigation Measures That Would Be Implemented

48

This section lists the mitigation measures that report’s authors are recommending to be implemented, as described in the previous sections. We would want to be sure that these measures are actually implemented.

Statement on Appendices

Any specific concerns related to the appendices are included above.

American Federal of Government Employees AFL-CIO, July 30, 2020 – Gregory B. Green II

Comment 1: GSA's building management is evaluating its facilities at the Suitland Federal Center to ensure that measures are implemented to control the spread of COVID 19.

Comment 2: GSA is currently finalizing a feasibility study that will fully evaluate BLS' relocation and the aggregate impacts of all existing tenant footprints at the SFC. The final BLS program and footprint currently appears to feasibly fit within the SFC.

Comment 3: As stated in the EA, before entering into a new lease, GSA first looked at existing Federal space for the relocation of BLS. The final anticipated BLS program and footprint currently appears to feasibly fit within the SFC. GSA has, therefore, not considered the evaluation of additional Federal properties for the accommodation of the 1,800 BLS employees currently at the Postal Square Building.

Comment 4: Comment noted.

Comment 5: Comment noted.

Comment 6: A robust set of TDM strategies are included in the TMP to reduce single occupancy vehicle trips and parking demand. A parking demand study could be conducted post-COVID to assess existing parking demand and project future parking demand.

Comment 7: Bureaus may need to consider meeting to discuss a jointly amenable approach to defining "equitable" and subsequently come to a mutual agreement of the distribution of available, on-site parking. GSA does not manage the distribution of parking except to A) ensure that tenant requests for parking do not exceed the parking capacity on site and B) temporarily lease known available parking to outside tenants.

Comment 8: The BLS program will be based on the workplace standards and projected headcounts provided by BLS to GSA and will also include considerations of established union agreements, joint use space, circulation, etc. GSA has encouraged BLS to share all GSA deliverables with AFGE to ensure that expectations are set and maintained.

Comment 10: Consideration of relocation to Suitland in lieu of staying in place allows for improved floor plate efficiency, which further reduces the UR beyond what Postal Square and its unique and relatively inflexible floor plate can allow. This co-location also supports the government's ability to consolidate out of a leased scenario and save taxpayers' money. The scope of this EA includes the analysis of a single "Action" against a "No Action" alternative; a "stay-in-place" reduction was not presented to GSA as an alternative. However, other EAs for other analyses can be provided if funded and justified.

Comment 11: Given the Administration's Delivering Government Solutions in the 21st Century plan's recommendation to consolidate critical economic statistics programs at Census, the Bureau of Economic Analysis, and the Bureau of Labor Statistics to make "agency operations more efficient, improve products, and reduce respondent burden," and the projected leased cost avoidance and resulting savings to the taxpayer by vacating Postal Square, a downsizing of BLS in-place was not considered.

Nonetheless, a reduction in square footage at Postal Square would incur costs as well, including but not limited to, move and replication costs (which would include shifting equipment), swing costs to move people around as space is constructed, construction in a historic building, historic review, etc.

Comment 12: NEPA is activated after specific decisions have been made at the programmatic level, and it looks only at the information that those specific decisions provide. The NEPA process can only be done if the team has received decisions on multiple possible avenues of project "success" (or alternative "actions"). In this case, GSA only has two known avenues of "success": either 1) BLS moves to SFC (the "action") or 2)

BLS does not move (a "no action") and, therefore, its footprint remains the same as of today.

If, for some reason, the move to SFC does not come to fruition, the only other known avenue for success at this point in time (i.e., the known variables necessary for the NEPA process to proceed) is for BLS to stay in place. This specific NEPA report looks only at those two options and, therefore, needs to be phrased as such. The NEPA process is specifically required to not explore unknown avenues of project "success."

The determination to relocate BLS v. constructing smaller footprints in place at PSB includes the consideration of costs to taxpayers over the life of the new BLS lease, weighed against the initial cost to design and construct the new space for BLS (whether at PSB or SFC). In this case, taxpayers can anticipate saving tens of millions of dollars as part of the BLS relocation as a result of much higher cost to continue to rent at PSB for the duration of the new lease, even accounting for upfront savings in design and construction.

Comment 12: As stated in the EA, before entering into a new lease, GSA first looked at existing Federal space for the relocation of BLS. The final anticipated BLS program and footprint currently appears to feasibly fit within the SFC. GSA has therefore, not considered the evaluation of additional Federal properties for the accommodation of the 1,800 BLS employees currently at the Postal Square Building.

Comment 13: Comment noted.

Comment 14: Comment noted.

Comment 15: As stated in the EA, GHG emissions from increased vehicle traffic would be minimal because the increase in employees would only marginally increase the levels of traffic and increase in Metro usage. Building system upgrades may be necessary to support additional employees, but GSA would ensure modern, energy-efficient upgrades are made that would minimize GHG emissions.

Comment 16: There is no evidence that the cost of living would increase with only a discernable increase in people moving to the area as a result of the BLS relocation.

Comment 17: Comment noted.

Comment 18: Comment noted.

Comment 19: Comment noted. Estimates were obtained from the U.S. Census Bureau, 2018 American Community Survey (ACS) 2018 5-year estimates.

Comment 20: The answers to these questions - specific to security operations and equipment implemented in a Federal facility - are considered CUI under GSA CIO 2103.1 and cannot be provided in a public forum.

Comment 21: The EA will be updated with current crime data for the PSB.

Comment 22: The EA will be updated with current crime data for the PSB.

Comment 23: The EA states the increase in calls to District 8 and/or Metro Transit Police likely would be slight, but detectable resulting in a long-term, minor, adverse impact. It is up to District 8 and Metro Transit Police to determine if additional deployments would be warranted.

Comment 24: Comment noted.

Comment 25: Comment noted.

Comment 26: Comment noted. The TMP identifies a need to evaluate the capacity of the security check points to enhance flow into and out of the site.

Comment 27: Comment noted. The TIS includes recommendations for mitigating the impact of the additional employee trips. Furthermore, a TMP has been developed for the site to provide enhance access and attractiveness of other modes.

Comment 28: A robust set of TDM strategies are included in the TMP to reduce single occupancy vehicle trips and parking demand. A parking demand study could be conducted post-COVID to assess existing parking demand and project future parking demand.

Comment 29: No additional credit to the AM or PM peak hour trips is applied beyond the 58% estimate. The TIS looks at the peak one-hour period in the AM and PM peak based on data provided by the Institute of Transportation Engineers for sites of similar type and sizes. While a total of 1,044 cars may arrive onsite, they do not all arrive in one hour. Arriving trips and departing trips are typically spread across a three to four-hour period in the morning and evening.

Comment 30: Implementing a significant shuttle service, such as would be required to maintain an effective shuttle between Downtown and the SFC, would require GSA to overcome several regulatory and budget-related hurdles. However, it should be noted that the timeline (within 5-10 years) is intended to be started from the adoption of this TMP in 2020, and not 5 years from BLS occupation of the site. The TMP will be revised to soften the timeline for this to indicate that a shuttle service could be started sooner than the 5-10-year timeframe if possible.

Comment 31: Comment noted.

Comment 32: Comment noted.

Comment 33: The definition of major impact is one that is severe, significant, and highly noticeable. For this project, construction or vehicle emissions are not considered a major impact. Furthermore, GSA has provided mitigation measures in the EA to reduce the level of impacts due to emissions.

Comment 34: Comment noted.

Comment 35: Comment noted.

Comment 36: Comment noted.

Comment 37: Comment noted.

Comment 38: Comment noted.

Comment 39: The EA states co-locating Federal facilities into one building would require a lower expenditure of funds (no rent to pay at the Postal Square Building), energy (three agencies rather than two in one location and the Federal government would not be expending energy at the Postal Square Building), and fuel that are presently committed under the existing leased facility.

Comment 40: Comment noted.

Comment 41: Comment noted.



Larry Hogan, Governor
Boyd Rutherford, Lt. Governor
Jeannie Haddaway-Riccio, Secretary

August 11, 2020

Mr. Paul Gyamfi
U.S. General Services Administration
301 7th Street, SW
Room 4004
Washington, DC 20407

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

Dear Mr. Gyamfi:

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

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

Sincerely,

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

ER# 2020.1140.pg

Maryland Department of Natural Resources – Lori A. Bryne

Comment 1: Comment noted.



Maryland DEPARTMENT OF PLANNING

August 5, 2020

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

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20200701-0574

Applicant: U.S. General Services Administration

Project Description: Draft Environmental Assessment: Proposed Action Includes Relocation of the 1,800 U.S. Department of Labor Bureau of Labor Statistics (BLS) Employees from Postal Square Building (Leased Space) to Suitland Federal Center (Owned), and Upgrading/Renovating SLC Systems, Office Space, and Exterior Land Uses

Project Address: 4600 Silver Hill Road, Suitland, MD 20746

Project Location: Prince George's County

Recommendation: Consistent with Qualifying Comments

Dear Mr. Gyamfi:

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

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

The Maryland Departments of General Services, and Natural Resources; the Metropolitan Washington Council of Governments; and the Maryland Department of Planning, including the Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of Planning (Planning) included the following comments: "This project is the Environmental Assessment for the Bureau of Labor Statistics relocation of 1800 employees from DC to the Suitland Federal Center located at 4600 Silver Hill Road. The ultimate project includes the upgrade and renovation of approximately 367,000

square feet of interior space and also includes statements relating to ‘improving exterior land uses.’ It is unclear if this means exterior to the Suitland Federal Center. If so, notations in the Transportation Management Plan indicate that the agency has intentions of working with MDOT SHA [the Maryland Department of Transportation State Highway Administration] and Planning recommends that the pedestrian routes be evaluated for elements relating to pedestrian comfort and safety within the streetscape including the introduction of shade trees along the pedestrian route of Silver Hill Road, specifically the area adjacent to the WMATA [Washington Metropolitan Area Transit Authority] property.”

1

The Metropolitan Washington Council of Governments (MWCOC) included the following comments: “The planned relocation of 1,800 BLS jobs from the MWCOC NoMa / Capitol Hill Activity Centers to the MWCOC Suitland Activity Center at the Suitland Federal Center in Suitland, MD is consistent with MWCOC Region Forward Goals and Targets. The planned relocation will be in close proximity to a High-Capacity Transit Station (Suitland WMATA / Metro Station) as well.

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

3

The Maryland Department of Transportation found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized in the enclosed letter.

4

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

5

1. “Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Resource Management Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. Any contract specifying ‘lead paint abatement’ must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1978 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental

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Mr. Paul Gyamfi

August 5, 2020

Page 3

State Application Identifier: **MD20200701-0574**

- site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please Land Restoration Program at (410) 537-3437.
7. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may require site approval. Contact the Mining Program at (410) 537-3557 for further details.”

12

The Maryland National Capital Parks and Planning Commission - Prince George's County found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below.

13

“Development of this site may be subject to Prince George's County Mandatory Referral review process. Special Projects Section staff recommends the submission of detailed plans upon completion of the environmental assessment. The subject site is bordered by Silver Hill Road and Suitland Road, a master plan designated arterial and collector road, respectively. Should the subject site develop, dedicating roadway rights-of-way along both roadways may be required. The area surrounding the subject property features a network of sidewalks which provides pedestrian connectivity throughout the Suitland Federal Center, and other nearby amenities. In the immediate off-campus vicinity of the Suitland Federal Center, Silver Hill Road and Suitland Road are designated as planned bicycle lanes per the 2009 Prince George's County Master Plan of Transportation. Silver Hill Road currently displays shared lane markings for bicycle use. The Suitland Metrorail Station is located directly to the southwest of the Suitland Federal Center, located at 4500 Silver Hill Road. To the north of the subject site is the Suitland Town Center development (4-15005). This development includes a trail facility along the south side of Suitland Road, abutting the subject site. Transportation Planning Staff recommend that pedestrian connectivity and walkability not be adversely affected with the proposed relocation of staff to the Suitland Federal Center.”

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The State Application Identifier Number must be placed on any correspondence pertaining to this project.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at sylvia.mosser@maryland.gov.

Thank you for your cooperation with the MIRC process.

Sincerely,



Myra Barnes, Lead Clearinghouse Coordinator

MB:SM

Enclosure—Maryland Department of Transportation comment letter, dated July 24, 2020

cc:

Ian Beam - MDOT
Amanda Redmiles - MDE
Tony Redman - DNR

Tanja Rucci - DGS
Kathleen Herbert - PGEO
Ivy Thompson - MNCPPCP

Greg Goodwin - MWCOG
Joseph Griffiths - MDPL
Beth Cole - MHT

Maryland Department of Planning, August 5, 2020 – Myra Barnes

Comment 1: GSA has conducted streetscape/transportation studies for better pedestrian walkability and connectivity, and landscaping within the campus and on the exterior of the SFC. MDOT/SHA had discussions with GSA to improve the exterior landscaping and sidewalks adjacent to Suitland and Silver Hill Roads which are State of Maryland Roads. References to enhanced pedestrian facilities in Section 5.2.7 of the TMP have been updated to include a recommendation for pedestrian comfort and safety considerations such as Street trees.

Comment 2: Comment noted.

Comment 3: Comment noted.

Comment 4: Comment noted.

Comment 5: Comment noted.

Comment 6: Comment noted.

Comment 7: Comment noted.

Comment 8: Comment noted.

Comment 9: Comment noted.

Comment 10: Comment noted.

Comment 11: Comment noted.

Comment 12: Comment noted.

Comment 13: Comment noted.

Comment 14: Comment noted.

Comment 15: Comment noted.

Comment 16: Comment noted.

Comment 17: Comment noted.

Comment 18: Comment noted.

July 24, 2020

Mr. Paul Gyamfi
Senior NEPA Compliance Specialist
Office of Planning and Design Quality
Public Buildings Service - National Capital Region
United States General Services Administration
301 7th Street, NW, Room 4004
Washington DC 20405

Dear Mr. Gyamfi:

Thank you for providing the Maryland Department of Transportation State Highway Administration (MDOT SHA) the opportunity to comment on the July 2020 U.S. Department of Labor Bureau of Labor Statistics Relocation Draft Environmental Assessment. The MDOT SHA looks forward to continuing to work with the General Services Administration (GSA), the Bureau of Labor Statistics (BLS), Prince George's County, and the Maryland-National Capital Park and Planning Commission to develop and implement transportation infrastructure to support the relocation of the BLS headquarters in Suitland. The MDOT SHA submits the following comments regarding the draft environmental assessment (EA), Appendix D – Traffic Impact Study, and Appendix E – Transportation Management Plan.

1

General Comments

- MDOT SHA supports this GSA's and BLS's focus on facilitating transit use, improving bicycle and pedestrian accessibility and facility connectivity, and promoting transit-oriented development. In general, the recommendations proposed in this EA are supported by MDOT SHA's emphasis to provide transportation facilities that accommodate all users of all modes. This emphasis led MDOT SHA to develop *Context Driven: Access & Mobility for All Users*, a planning and design resource including guidance centered on establishing safe and effective multimodal transportation systems. For additional information regarding MDOT SHA's context driven approach to accommodating users of all modes, please visit https://www.roads.maryland.gov/OC/Context_Driven-Access-and-Mobility-For-All-Users.pdf.

2

U.S. Department of Labor Bureau of Labor Statistics Relocation Draft Environmental Assessment

- pp. 3-20-3-21, section 3.7.1 – This EA identifies I-95/I-495 (Capital Beltway), MD 4 (Pennsylvania Avenue), and Suitland Parkway as highways that provide regional access to the Suitland Federal Center (SFC), and MD 458 (Silver Hill Road) and MD 218 (Suitland Road) as roadways that provide local access. While the EA does discuss MDOT SHA’s MD 4 interchange construction project at Suitland Parkway, which currently is in construction and anticipated to be complete in the Fall of 2023, the EA does not document other MDOT SHA projects near the SFC, which include:
 - I-95/I-495 Suitland Parkway Bridge Replacement – In construction; anticipated complete by end of 2021
 - I-95/I-495 Suitland Road Bridge Replacement – In construction; anticipated complete late Summer/early Fall of 2020
 - I-495 & I-270 Managed Lanes Study – Draft environmental impact statement (EIS) published June 2020; comment period underway; final EIS anticipated 2021
 - MD 218 Bicycle Retrofit Project – Installation of bicycle lanes, signage, and restriping; design on hold awaiting funding
- pp. 3-23-3-24, section 3.7.3., table 6 – This table, Alternatives Lane Groups Operating at Overall LOS (level of service) E or F, shows LOS by lane, only, for all but the MD 5 intersection at Iverson Street/MD 458. The MDOT SHA recommends overall intersection LOS be included for all intersections analyzed. In addition, consider accompanying table 6 with a map illustrating the location of the subject intersections.
- p. 3-26-3-27, sections 3.7.7-3.7.8 – Design of transportation improvements generally is beyond the scope of a planning document such as this draft EA. Nonetheless, if modifications ultimately are approved to or otherwise impacting MDOT SHA facilities or infrastructure, these will need to be supported by appropriate traffic operations or other pertinent studies at the time improvements are proposed to advance.

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Appendix D – Traffic Impact Study

- Although the traffic impact study (TIS) focuses on mitigation such as improving connections and facilities for other transportation modes, MDOT SHA recommends vehicular traffic mitigation should be pursued to improve traffic operations at the MD 458 intersections at MD 218 and at Swann Road. Potential options may include adding additional lanes, extending existing turn lanes (either along MD 458 or side streets), and/or modifying side street approach lane designations (along MD 218 and/or Swann Road) to optimize the existing roadway network.

6

- MDOT SHA recommends coordination between the SFC and Smithsonian Institution Museum Support Center as both facilities have proposed plans to provide a shared-use path along the frontage of their properties along MD 458, which MDOT SHA believes would be beneficial to both facilities as well as the general public. 7
- U-turn volumes are not considered in either the volume sets or the Synchro analysis. The MDOT SHA recommends the addition of U-turn volumes to left-turn movements. The additional volume can impact left-turn delay significantly, particularly when U-turn volumes are higher than left-turn volumes. Also, counts used in the Synchro analysis should be expanded to match the existing conditions year using the background growth rates defined in the study. 8
- To document how much additional capacity is available at study intersections, MDOT SHA recommends this TIS include overall v/c ratios for all study intersections. 9
- To assist reviewers when comparing alternatives and assessing BLS relocation impacts, MDOT SHA recommends this TIS include overall intersection LOS for all study intersections. 10
- To identify any locations that would be expected to experience queue spillovers, MDOT SHA recommends this TIS compare queue lengths to available storage lengths. 11
- p. 19 – To fully capture the impacts of mitigation recommended to the Suitland Parkway interchange at MD 458, MDOT SHA recommends this TIS include weave analyses. 12

Appendix E – Transportation Management Plan

- The employee surveys in the transportation management plan (TMP) on existing and expected mode share were administered prior to local Covid-19-related stay-at-home orders that significantly altered travel patterns and volumes. The MDOT SHA recommends this transportation management plan (TMP) also consider such travel patterns and volumes with stay-at-home orders and increased levels of telework in place as such situations may result in long-term changes to travel patterns and volumes. 13
- The employee surveys involved the assumption that BLS employees moving to the SFC likely would have similar mode splits as existing SFC employees, despite the survey indicating that the non-driver mode split would be higher. This is reasonable, as most employees SFC and BLS employees reside outside I-95/I-495, where making trips by public transit requires transfers to reach SFC. 14

- The BLS relocation will increase SFC employment from 11,500 to 13,300 with 4,360 parking spaces available and no new spaces planned. Given that the employee survey indicated that existing SFC parking already is constrained, parking likely will be insufficient unless transportation demand management-type measures are implemented upon BLS employee transfer. As an alternative, MDOT SHA notes that the transfer of BLS employees to SFC could be phased over time. 15
- MDOT SHA recommends performance monitoring of traffic counts include parking utilization rates by time of day. 16
- The existing BLS site has a bicycle/pedestrian mode share of five percent compared to zero percent at the SFC site. The TMP references opportunities for transit-oriented development (TOD) near the SFC site. The proximity of the proposed TOD to Suitland Metro Station could provide ancillary benefits resulting in the reduction of vehicular trips to SFC. 17
- The TMP discusses incentivizing carpooling/vanpooling. Given limited parking availability, MDOT SHA notes that guaranteed parking spaces for carpooling/vanpooling vehicles could be a viable incentive. 18

Thank you again for the opportunity to comment on the U.S. Department of Labor Bureau of Labor Statistics Relocation Draft Environmental Assessment. If you have questions, please contact Mr. David Rodgers, MDOT SHA Regional Planner, at 410-545-5670, toll free 1-888-204-4828, or via email at drodgers1@mdot.maryland.gov. Mr. Rodgers will be happy to assist you.

Sincerely,



Matt Baker
Chief
Regional and Intermodal Planning Division (RIPD)

cc: Mr. Darren Blue, Public Buildings Service Regional Commissioner, National Capital Region, GSA
Mr. David Rodgers, Regional Planner, RIPD, MDOT SHA

Maryland Department of Transportation, July 24, 2020 – Matt Baker

Comment 1: Comment noted.

Comment 2: Comment noted.

Comment 3: Comment noted.

Comment 4: Revised to include the additional projects recommended by NJTA

Comment 5: The table will be edited to show overall intersection LOS and a map/graphic has been added to the EA as well as the TIS.

Comment 6: Comment noted.

Comment 7: Page 20 of the TIS includes recommendations for physical changes to the intersection of MD 458 and Swann Road which include a new Swann Road turn lane and reconfiguring the lane assignment. A recommendation is also included to provide a WB MD 458 right-turn lane to Swann Road to accommodate some queues that can build in that lane during the AM peak period. Site-generated impacts at the intersection of MD 218 and MD 458 were minimal and were mitigatable utilizing signal timing enhancements, thus no additional improvements were recommended. Furthermore, GSA is not required to provide off-site transportation improvements. Therefore, intersection modifications at this location would have to be provided by MDOT.

Comment 8: Comment noted.

Comment 9: The analysis has been revised to incorporate U-turns. However, Stantec discussed the TIS process with representatives from Prince George's County and it was determined that since most of the data was collected in 2019, a growth rate would not be needed. Furthermore, intersections along MD 212 (which had data collected in 2014) were balanced up based on the data for the intersection of MD 458 and MD 212. Thus, this would account for any growth on the network between 2014 and 2019.

Comment 10: Synchro does not provide an overall intersection V/C ratio. The intersection v/c ratio is simply the maximum v/c of any movement at the intersection. Furthermore, the Highway Capacity Manual states that overall intersection LOS is strictly determined by delay.

Comment 11: All tables will be edited to show overall intersection LOS and a graphic map will also be provided.

Comment 12: A table comparing queue lengths in the Build with mitigation condition to available queue lengths will be provided.

Comment 13: A weave analysis has been included.

Comment 14: Comment noted.

Comment 15: Comment noted.

Comment 16: Comment incorporated into the TMP.

Comment 17: Comment noted.

Comment 18: Comment noted.

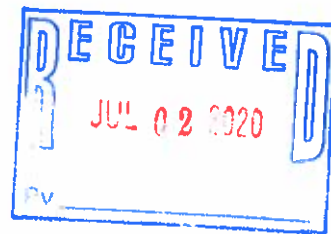
20200 3146

F
GSA
EJR



GSA National Capital Region

June 30, 2020



Ms. Amanda Apple
Preservation Officer, Review and Compliance
Maryland Historical Trust
100 Community Place
3rd Floor
Crownsville, MD 21032-2023

Re: Environmental Assessment prepared in accordance with the National Environmental Policy Act for the proposed relocation of the Bureau of Labor Statistics to the Suitland Federal Center available for public review and comment

Dear Ms. Apple:

Please be advised that the U.S. General Services Administration (GSA) has prepared an Environmental Assessment (Draft EA) for the proposed relocation of the U.S. Department of Labor's Bureau of Labor Statistics (BLS) from the Postal Square Building, located at 2 Massachusetts Avenue, NE, Washington, DC, to the Suitland Federal Center (SFC), located at 4600 Silver Hill Road, Suitland, MD. The Draft EA was prepared pursuant to the National Environmental Policy Act, as amended (NEPA) (42 United States Code 4321, et seq.) and the Council on Environmental Quality Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations Parts 1500-1508).

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

NEPA requires Federal agencies to provide the public with an opportunity to participate in the process of analyzing the impacts of their actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of the 30-day public comment period for the EA. Your participation in this process and any feedback you have is greatly appreciated.

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405
www.gsa.gov

#2 NA re 7/16/2020

Prior GSA Review #2 NA 20200 1475

Copies of the Draft EA are available for public review at the following locations:

- Spauldings Library: 5811 Old Silver Hill Road, District Heights, MD;
- Online: www.gsa.gov/ncrnepa.

Written comments concerning the Draft EA should be submitted within 30 days of the date stamped on this letter to:

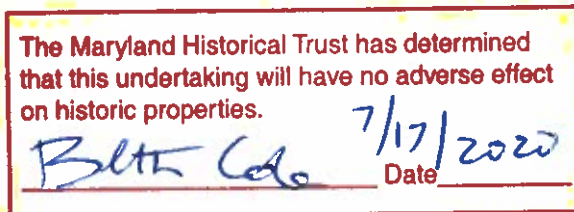
Mr. Paul Gyamfi
Senior NEPA Compliance Specialist
Office of Planning and Design Quality
Public Buildings Service - National Capital Region
U.S. General Services Administration
1800 F Street, NW, Room 4400
Washington, DC 20405

Comments may also be sent by email to paul.gyamfi@gsa.gov.

If you have any questions, please contact Paul Gyamfi, Senior NEPA Compliance Specialist, at (202) 440-3405.

Sincerely,

DocuSigned by:
Darren Blue
A129529746E1427
Darren J. Blue
Regional Commissioner
Public Buildings Service



Maryland Historical Trust, July 17, 2020 – Beth Cole

Comment 1: Comment noted.



THE PRINCE GEORGE'S COUNTY GOVERNMENT

Department of the Environment



Angela D. Alsobrooks
County Executive

Joseph P. Gill
Director

August 26, 2020

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

Dear Mr. Gyamfi:

Thank you for the June 30, 2020 correspondence your office forwarded regarding the U.S. General Services Administration (GSA) draft environmental assessment for the proposed relocation of the U.S. Department of Labor's Bureau of Labor Statistics (BLS). The letter indicates that GSA proposes to relocate approximately 1,800 BLS employees to the Suitland Federal Center (SFC) at 4600 Silver Hill Road in Suitland, Maryland. It further indicates that this proposed relocation will entail upgrade(s) to existing building systems, renovation of office space and improvement to exterior land uses.

Staff reviewed the document entitled "U.S. Department of Labor, Bureau of Labor Statistics Relocation, Draft Environmental Assessment," prepared by Stantec and dated July 2020. This review revealed that neither the grounds nor the building footprint of the SFC will be modified as a result of the project. However, the assessment states that vehicle emissions on roadways surrounding the SFC are expected to increase with the addition of BLS employees who will be commuting to their new work location. The County's Department of Public Works and Transportation (DPW&T) and the Maryland-National Capital Park and Planning Commission (M-NCCPC) have oversight for transportation planning functions for the County. Please coordinate your traffic impact analyses with these agencies.

1

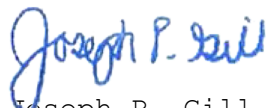
Prince George's County Redevelopment Authority is the County's managing agency for the *Town Square at Suitland Federal Center Project* which will be constructed at an adjoining site. The July 2020 draft environmental assessment for the BLS relocation project accounts for this proposed mixed-use development in a cumulative impact evaluation. As noted above, this assessment indicates that an increase in commuting employees would increase vehicle densities on roadways surrounding SFC and adversely impact traffic and air quality conditions. Our Department encourages you to collaborate with the Redevelopment Authority on opportunities to reduce anticipated project impacts to travel activity and to establish good neighbor relationships. Please feel free to contact Mr. Ernest Williams, III, Real Estate Development Manager, Redevelopment Authority, at eywilliams@co.pg.md.us to learn more about the Town Square project.

2

Mr. Paul Gyamfi
August 26, 2020
Page Two

Thank you for the opportunity to comment on this draft environmental assessment. We would concur with GSA's findings in this matter, providing recommendations agree with County and State regulations and permit requirements. Should you have any questions or need additional information, please feel free to contact me at (301) 883-5812.

Sincerely,



Joseph P. Gill
Director

cc: Floyd E. Holt, Deputy Chief Administrative Officer
for Government Infrastructure, Technology and Environment

Ernest Y. Williams, III, Real Estate Development Manager
Redevelopment Authority

Michelle W. Russell, Deputy Director
Department of the Environment

Jeffrey M. DeHan, Associate Director
Stormwater Management Division, DoE

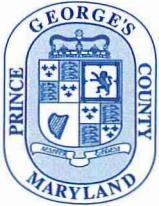
Dawn Hawkins-Nixon, Associate Director
Sustainability Division, DoE

Prince George's County Department of the Environment, August 26, 2020, Joseph P. Gill

Comment 1: Comment noted.

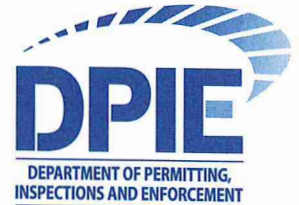
Comment 2: Comment noted.

Comment 3: Comment noted.



Angela D. Alsobrooks
County Executive

THE PRINCE GEORGE'S COUNTY GOVERNMENT
Department of Permitting, Inspections and Enforcement
Office of the Director



August 3, 2020

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

Re: Environmental Assessment (EA)
Proposed Relocation of the Bureau of Labor and Statistics
to the Suitland Federal Center

Dear Mr. Gyamfi:

This is in response to your June 30, 2020, request for review and comments of the above Environmental Assessment referral for the proposed relocation of the Bureau of Labor and Statistics to the Suitland Federal Center located at 4600 Silver Hill Road, Suitland, Maryland.

The Department of Permitting, Inspections and Enforcement (DPIE) is in support of this project and will actively work with the applicant to secure local/State approvals. DPIE has no objection to this proposed relocation.

Thank you for the opportunity to review this referral. If you need additional information, please contact Nanji Formukong, the District Engineer for the area, Site/Road Plan Review Division, at 301.636.2060.

Sincerely,


Dawit Abraham

Melinda M. Bolling
Director

MB:NF:dar

cc: Gary E. Cunningham, Deputy Director, DPIE
Dawit Abraham, P.E., Deputy Director, DPIE
Mary C. Giles, P.E. Associate Director, S/RPRD, DPIE
Rey de Guzman, P.E., Chief, Site/Road Section, S/RPRD, DPIE
Nanji Formukong, District Engineer, S/RPRD, DPIE

Prince George's County Department of Permitting, Inspections and Enforcement, August 3, 2020, Dawit Abraham

Comment 1: Comment noted.

From: [Paul Gyamfi - WPDBA](#)
To: [Estes, Liz](#); [Courtney Benton - WPIA](#); [Marshall Popkin - WPDBA](#); [Rodney Moulden \(WPDA\)](#); [Tom Terrio - WPDBA](#); [Catherine, Adam](#)
Subject: Fwd: Response to the Environmental Assessment for the BLS Relocation
Date: Thursday, July 30, 2020 4:07:31 PM

Liz,
BLS EA comments for a BLS employee.

Thank you.
Paul.

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

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

From: Jean Fox <jeanharrisfox@gmail.com>
Date: Thu, Jul 30, 2020 at 3:54 PM
Subject: Response to the Environmental Assessment for the BLS Relocation
To: <paul.gyamfi@gsa.gov>

As an employee of the Bureau of Labor Statistics (BLS), I would like to submit my concerns resulting from GSA's Draft Environmental Assessment, Traffic Impact Study, and the Transportation Management Plan regarding the relocation of BLS to the Suitland Federal Center (SFC) in Maryland. I believe that the move will have significant negative impacts on the environment and on the BLS staff.

Transportation will be a significant problem. Although Metro is an option, being at the end of the Green line and away from transportation hubs will make the option of public transportation less practical for most employees. This is apparent in the fact that 68-73% of the BEA and Census staff currently drive to work alone, compared to just 4% of BLS staff at the Postal Square Building. The more difficult commute on Metro will force more BLS staff to drive alone, exacerbating problems with traffic, parking, and air pollution.

The traffic study indicates that traffic in the local Suitland area is already problematic, and it will only get worse with the addition of 1,800 BLS employees. Further, the traffic flow on the campus itself is also already bad. In fact, an early departure due to weather in January 2020 led to delays leaving the campus *of several hours*. This posed a substantial risk to employees, who were trying to get home before travel conditions became dangerous. The ability to exit the campus quickly will be critical in any emergency where employees need to get home as soon as possible, to avoid putting the employees at risk.

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A second concern regarding transportation is that there is already not enough parking. The current staff report that parking can be full by 9 am. Further, one of the parking structures is slated to be removed and replaced with surface parking, which will reduce the parking available, exacerbating the problem. There are no recommendations or plans to increase parking available to employees.

3

A third concern is that moving to Suitland will increase the commute time for almost all BLS employees. The survey of BLS staff indicates that 87% would have an increased commute, with about 50% reporting an increase of 30-60 minutes *each way*, and another 16% reporting an increase of more than one hour *each way*. So 66% of the staff expect that the move will increase their current commute by at least an hour a day, potentially up to two or more hours per day on top of their current commute. This is unsustainable for most staff, who will be forced to resign or retire, leading to a critical loss of knowledgeable, experienced, and talented staff, which in turn will have a significant impact on the agency's ability to meet its mission of providing reliable, quality data about the US economy.

4

Given these serious challenges for BLS employees to get to and around the SFC campus, it is disappointing that the report does not consider any options other than relocating to the SFC campus. For example, since one of the goals of this project is to reduce the footprint of BLS, that could also be accomplished at its current location at the Postal Square Building in Washington DC. This would eliminate all the concerns about transportation, therefore eliminating the risk of significant personnel losses.

5

A final concern is that the report does not consider the potential new needs caused by the current pandemic crisis. For example, the airflow can have a significant impact on the spread of illness. Buildings may need additional systems to control air quality and airflow, and this has not been addressed in this report. This will especially be a concern with this relocation plan because the staff will be housed much closer together, in just 40% of their current footprint.

6

Given the findings in the report, there are a number of significant negative impacts and serious concerns should BLS relocate to the SFC campus.

Thank you for your consideration,

Jean Fox

Jean Fox, July 30, 2020

Comment 1: Comment noted.

Comment 2: Comment noted. The TMP identifies a need to evaluate the capacity of the security check points to enhance flow into and out of the site.

Comment 3: A parking assessment was not able to be conducted prior to COVID-19 restrictions. A study could be deferred until after COVID in order to get a more accurate count of existing parking demand, particularly if there is a higher work from home percentage post-COVID, and how that compares to potential demand as well as NCPC parking ratio requirements. However, a robust set of transportation demand management strategies is recommended in the TMP to reduce single-occupancy vehicle trips across the campus.

Comment 4: Comment noted.

Comment 5: Comment noted. As stated in the EA, before entering into a new lease, GSA first looked at existing Federal space for the relocation of BLS. The final anticipated BLS program and footprint currently appears to feasibly fit within the SFC. GSA has therefore, not considered the evaluation of additional Federal properties for the accommodation of the 1,800 BLS employees currently at the Postal Square Building. Furthermore, based on the purpose and the need for the BLS relocation, the proposed investment in, and space optimization of, the North and South Buildings at the SFC will facilitate the achievement of more efficient utilization rates for all three Federal organizations, and reduce rental payments. The relocation of BLS is needed to meet the requirements set forth in the U.S. Office of Management and Budget Memorandum M-12-12, which requires the Federal Government to reduce their overall footprint and look at Federal space first before seeking out other leases.

Comment 6: GSA's building management is evaluating its facilities at the Suitland Federal Center to ensure that measures are implemented to control the spread of COVID 19.

From: [Paul Gyamfi - WPDBA](#)
To: [Estes, Liz](#); [Marshall Popkin - WPDBA](#); [Courtney Benton - WPIA](#); [Rodney Moulden \(WPDA\)](#)
Subject: Fwd:
Date: Monday, July 6, 2020 10:28:56 AM

BLS EA Comments

FYI

Thank you.
Paul.

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

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

From: **Patrick Cardiff** <ptrkcrdf@gmail.com>
Date: Mon, Jul 6, 2020 at 10:06 AM
Subject:
To: <paul.gyamfi@gsa.gov>

Hi Paul,
re:
BLS to Suitland

What is the plan for parking? Sometimes all parking spaces are filled at the SFC. | 1
Will there be doubling up of office space? | 2
Will there be renewed and urgent increase of telework? | 3
I suppose generally I am skeptical that this decision has been properly considered.
Thank you for your frank response.

Thanks
Pat Cardiff
BEA

Patrick Cardiff, July 6, 2020

Comment 1: A parking assessment was not able to be conducted prior to COVID-19 restrictions. A study could be deferred until after COVID in order to get a more accurate count of existing parking demand, particularly if there is a higher work from home percentage post-COVID, and how that compares to potential demand as well as NCPC parking ratio requirements. However, a robust set of transportation demand management strategies is recommended in the TMP to reduce single-occupancy vehicle trips across the campus.

Comment 2: The number of offices and the concept of office sharing is dependent on the programming requirements provided to GSA by Bureau leadership. These program requirements, prior to being received by GSA, are expected to have been discussed with the personnel being impacted and with unions, if necessary.

Comment 3: This determination lies with the leadership of each Bureau and is required to be discussed with employee unions before being put into action. GSA understands that Census and BLS are in the process of or have recently completed personnel teleworking surveys to begin these discussions.

Comment 4: Comment noted.

From: [Paul Gyamfi - WPDBA](#)
To: [Estes, Liz](#); marshall.popkin@gsa.gov; courtney.benton@gsa.gov
Subject: Fwd: Environmental Assessment for the Relocation of the BLS to the SFC - Comment
Date: Wednesday, July 8, 2020 9:54:16 AM

BLS EA Comment.

Begin forwarded message:

From: edna66@verizon.net
Date: July 7, 2020 at 9:01:14 PM EDT
To: paul.gyamfi@gsa.gov
Cc: edna66@verizon.net
Subject: **Environmental Assessment for the Relocation of the BLS to the SFC - Comment**

Good evening Mr. Gyamfi

Why is the No Action Alternative of remaining in the Postal Square Building with 100% of its current footprint being compared to the Action Alternative which utilizes only 60% of the current BLS use of space in the Postal Square Building? Surely reducing the BLS use of space within the PSB to 60% would cost less than what BLS pays currently for rent. Also, BLS currently has the benefit of recruiting its workforce from Maryland, DC, and Virginia. A move to the Suitland Federal Complex would make Metro unfeasible for many in Virginia and thus reduce the number of employees willing to commute from Virginia to Maryland. I did not see a workforce/recruiting impact analysis in this study. Can that be found elsewhere?

1
2
3

Sincerely,

Sharon Stang

Sharon Stang, July 7, 2020

Comment 1: NEPA is activated after specific decisions have been made at the programmatic level, and it looks only at the information that those specific decisions provide. The NEPA process can only be done if the team has received decisions on multiple possible avenues of project "success" (or alternative "actions"). In this case, GSA only has two known avenues of "success": either 1) BLS moves to SFC (the "action") or 2) BLS does not move (a "no action" and, therefore, its footprint remains the same as of today.

If, for some reason, the move to SFC does not come to fruition, the only other known avenue for success at this point in time (i.e.: the known variables necessary for the NEPA process to proceed) is for BLS to stay in place. This specific NEPA report looks only at those two options and, therefore, needs to be phrased as such. The NEPA process is specifically required to not explore unknown avenues of project "success."

The determination to relocate BLS v. constructing smaller footprints in place at PSB includes the consideration of costs to taxpayers over the life of the new BLS lease, weighed against the initial cost to design and construct the new space for BLS (whether at PSB or SFC). In this case, taxpayers can anticipate saving tens of millions of dollars as part of the BLS relocation as a result of much higher cost to continue to rent at PSB for the duration of the new lease, even accounting for upfront savings in design and construction.

Comment 2: Comment noted.

Comment 3: GSA has not been engaged or provided funding to perform such an analysis. It would not be provided under an EA as part of the NEPA process. If such a request is made and funding is made available in a manner timely to the project's completion, a workforce impact study would be done separately by specialists in change management and workplace strategy.