



General Services Administration and Department of Homeland Security

# THE DHS HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT APPENDICES A-C

WASHINGTON, DC

AUGUST 2020



APPENDIX A  
Scoping Report

## St. Elizabeths Master Plan Amendment #2 Scoping Summary

The National Environmental Policy Act regulations require an “early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” Public and agency scoping was undertaken to determine the scope of issues to be analyzed in depth in the Environmental Impact Statement for the St. Elizabeths Master Plan Amendment 2.

A scoping period was held from November 15, 2018 to December 16, 2018. During this period, a public scoping meeting was held on November 19, 2018 at the R.I.S.E. Center on the St. Elizabeths East Campus in Southeast, Washington, D.C.

The scoping period and public scoping meeting were announced in the Notice of Intent published in the Federal Register on November 19, 2018 (Appendix A) and through advertisements published in *The Washington Post*, *The Afro-American*, and *The Informer* (Appendix B). In addition, letters providing information on the Master Plan Amendment 2, the scoping period, and the public scoping meeting were mailed to 339 Federal and District of Columbia elected officials, regulatory agencies, special interest groups, and local citizens. A copy of the mailing list can be found in Appendix C.

### **PUBLIC SCOPING MEETING**

A public scoping meeting was held on November 29, 2018 at the R.I.S.E. Center on the St. Elizabeths East Campus in Southeast, Washington, D.C. The meeting provided a forum for the project team to present the proposed Master Plan Amendment 2 to the public and explain the NEPA and NHPA processes. The meeting began at 6:30 pm and continued until 8:30 pm. Meeting attendees were asked to sign-in upon arrival and were given a handout explaining the proposed Master Plan Amendment 2 and the public comment process (see Appendix D). The meeting was an open house that provided attendees the opportunity to view informational displays of the NEPA and NHPA processes and the potential Master Plan alternatives (see Appendix E). GSA, DHS, and consultant staff were on hand to address questions and receive public comments. Comment forms were made available at the meeting.

A total of 16 individuals signed-in at the public scoping meeting (Appendix F).

### **NATURE OF WRITTEN COMMENTS RECEIVED DURING THE SCOPING PERIOD**

One formal written comment was received at the public scoping meeting and nine emails/letters were received by GSA during the public comment period (see Appendix G). Following is a summary of comments received:

#### Range of Alternatives

- The Supplemental EIS should document how GSA has determined there are no other feasible ways to reduce costs and shorten the duration of construction other than to expand onto the Pavilion site.

- The Supplemental EIS should include a description of any spaces outside the West Campus that may be occupied by DHS components.
- The Supplemental EIS should include a reasonable range of alternatives that include rehabilitation/reuse of historic buildings on campus.
- There is concern that the scoping materials did not address new elements that were presented in Consulting Party meetings including the new Office of Intelligence & Analysis building.
- GSA plans to improve space efficiency by shrinking employee cubicles from 80 square feet to 48 square feet. It is not clear how GSA projects a decrease in the number of seats on the West Campus (from 14,000 to 12,800) while simultaneously fitting more seats into the same amount of existing space and then constructing an additional net of +/- one million square feet of office. Please provide clarity on this.
- Please provide clarity on the square footages of buildings planned to be demolished (#60, 66, 67, 68, 69 and any others). This will help DDOT and GSA's traffic consultant in determining how best to model the changes to land uses and density.

#### Cultural Resources

- The project as proposed does not appear to have direct impacts on properties under the jurisdiction of the NPS.
- The Supplemental EIS should provide details on how the project may impact adjacent lands including Shepherd Parkway.
- The proposed concepts would result in the addition of approximately 250,000 gross square feet of new construction on the plateau site, which will result in the removal of a number of historic buildings that were designated for preservation and reuse, as well as, loss of historic character-defining features of the landscape.
- The new construction will introduce large, out-of-scale buildings into a historic campus, thus eroding its significant integrity.
- There is a concern that no rehabilitation will be funded until the new construction is complete, which is contrary to the Programmatic Agreement and leaves vacant historic structures vulnerable to demolition by neglect.
- GSA and DHS should identify workable uses for historic buildings and tie their rehabilitation to the new construction.
- All future correspondence on the NHL should be directed to the NPS National Capital Region.



### Natural Resources

- The Compact Plan for the plateau site should be selected so that less trees would be impacted.
- GSA should replant 3.6 acres of trees that would be lost under the Compact Plan.
- A tree planting plan should be included in the Master Plan for the plateau site.

### Economic Impacts

- There is concern over the linkage between the West and East Campuses, with the commenter questioning how the community will see economic benefits from the presence of employees on the West Campus.

### Transportation/Transit

- A Comprehensive Transportation Review (CTR) study should be scoped with DDOT's Neighborhood Planning Branch.
- As part of the CTR scope, a major component should include an update to the previous Transportation Management Plan (TMP) to mitigate any identified impacts to the transportation network.
- DDOT is not supportive of widening Martin Luther King Jr. Avenue SE from four to five lanes. The transportation analysis should assume a four-lane section (without turn lanes) under future conditions and explore all other mitigation options, such as a robust Transportation Demand Management (TDM) component of the TMP, providing shuttles to Metro, requiring employees to telework, and minimizing the amount of onsite vehicle parking, before considering the addition of travel lanes or turn lanes.
- GSA should coordinate with the St. Elizabeths East Campus regarding their site access points, the possibility of new traffic signals along the corridor, and how those relate to the West Campus's site access points in order to minimize the need for driveways along Martin Luther King Jr. Avenue SE.
- The Supplemental EIS should indicate whether the amount of vehicle parking will be increased or decreased or whether there will be new parking garages on the West Campus. Lower parking ratio than currently proposed should be considered. As reducing the amount of vehicle parking will reduce the potential impacts the action could have on the transportation network.
- GSA should provide clarity on commitments regarding new transportation infrastructure and the timing of that infrastructure.

### Miscellaneous Comments

- Federal funds should be spent on security of the southern border rather than on a project in the District of Columbia.

- K. Kulis, Advisory Council on Historic Preservation, should be added to the mailing list.
- GSA should continue to provide the Council on Environmental Quality (CEQ) with the results from the Scoping Meeting and to continue receiving updates on the Supplemental EIS.
- The Supplemental EIS should include the components outlined in CEQ's Regulations and include analysis under related environmental laws, regulations, and Executive Orders.

### Attachments

Appendix A: Federal Register Notice  
Appendix B: Newspaper notices  
Appendix C: Mailing List  
Appendix D: Meeting Handout  
Appendix E: Display Boards  
Appendix F: Sing-In Sheets  
Appendix G: Scoping Comments Received

## Appendix A: Federal Register Notice

inspection at the Federal Reserve Bank indicated. The applications will also be available for inspection at the offices of the Board of Governors. Interested persons may express their views in writing on the standards enumerated in the BHC Act (12 U.S.C. 1842(c)). If the proposal also involves the acquisition of a nonbanking company, the review also includes whether the acquisition of the nonbanking company complies with the standards in section 4 of the BHC Act (12 U.S.C. 1843). Unless otherwise noted, nonbanking activities will be conducted throughout the United States.

Unless otherwise noted, comments regarding each of these applications must be received at the Reserve Bank indicated or the offices of the Board of Governors not later than December 14, 2018.

*A. Federal Reserve Bank of Cleveland* (Nadine Wallman, Vice President) 1455 East Sixth Street, Cleveland, Ohio 44101-2566. Comments can also be sent electronically to

*Comments.applications@clev.frb.org*:

1. *Buckeye State Bancshares, Inc., Powell, Ohio*; to become a bank holding company by acquiring 100 percent of the outstanding voting shares of Buckeye State Bank, Powell, Ohio.

Board of Governors of the Federal Reserve System, November 13, 2018.

**Yao-Chin Chao,**

*Assistant Secretary of the Board.*

[FR Doc. 2018-25086 Filed 11-16-18; 8:45 am]

**BILLING CODE P**

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**GENERAL SERVICES  
ADMINISTRATION**

[Notice-PBS-2018-11; Docket No. 2018-0002; Sequence No. 27]

**Notice of Intent To Prepare a Supplemental Environmental Impact Statement for the Proposed U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan Amendment #2**

**AGENCY:** National Capital Region, Public Buildings Service U.S. General Services Administration (GSA).

**ACTION:** Notice of intent to prepare a Supplemental Environmental Impact Statement.

**SUMMARY:** GSA plans to prepare a Supplemental Environmental Impact Statement (SEIS) for the proposed

Master Plan Amendment to support the continued consolidation of the U.S. Department of Homeland Security (DHS) Headquarters at the St. Elizabeths West Campus, pursuant to the requirements of the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and with Section 106 of the National Historic Preservation Act (NHPA) in accordance with 36 CFR part 800.8

**DATES:** *Applicable:* Monday, November 5, 2018.

*The public scoping meeting date is:* Thursday, November 29, 2018, from 6:30 p.m. to 8:30 p.m., Eastern Daylight Time (EDT).

**ADDRESSES:** R.I.S.E Demonstration Center, 1730 Martin Luther King Jr. Avenue SE, Washington, DC, 20032.

**FOR FURTHER INFORMATION CONTACT:** Paul Gyamfi, GSA, National Capital Region, Office of Planning and Design Quality, at 202-690-9252. Please contact Mr. Gyamfi if special assistance is needed to attend and participate in the scoping meeting.

**SUPPLEMENTARY INFORMATION:** GSA intends to prepare a SEIS to analyze the potential impacts resulting from the proposed Master Plan Amendment #2 to support the DHS Headquarters consolidation at the St. Elizabeths West Campus.

**Background**

In 2008 and in 2012, GSA completed Environmental Impact Statements that analyzed the impacts from the development of 4.5 million square feet of secure office space, plus parking, in the District of Columbia to support the consolidated headquarters of the DHS on the St. Elizabeths East and West Campuses. GSA is preparing a SEIS to assess the impacts of development of the consolidated headquarters on the West Campus of St. Elizabeths. The proposed action is needed to improve efficiency, reflect the current condition of the historic buildings, reduce costs, and accelerate completion of the DHS consolidation. Previous St. Elizabeths Master Plans and Environmental Impact Statements are available for review at <http://stelizabethsdevelopment.com/nepa.html>.

**Alternatives Under Consideration**

GSA will analyze a range of alternatives (including the no action alternative) for the proposed Master

Plan Amendment #2 of the DHS Headquarters at St. Elizabeths. This Master Plan Amendment will focus on development options to efficiently house DHS and its operating components on the St Elizabeths West Campus.

**Scoping Process**

A scoping process will be conducted to aid in determining the alternatives to be considered and the scope of issues to be addressed, for identifying the significant issues related to the proposed Master Plan Amendment, in accordance with NEPA and NHPA.

**Public Scoping Meeting**

A public scoping meeting will be held on Thursday, November 29, 2018, from 6:30 p.m. to 8:30 p.m., EDT at the R.I.S.E Demonstration Center, 1730 Martin Luther King Jr. Avenue SE, Washington, DC 20032. The meeting will be an informal open house where meeting participants may receive information, and give comments. GSA is publishing notices in the *Washington Post*, *Afro-American*, and the *Washington Informer* newspapers announcing the meeting.

**Written Comments**

Interested parties are encouraged to provide written comments on the SEIS and Section 106 processes. The scoping period begins on November 19, 2018 and ends on December 19, 2018. Comments received during the scoping period will be considered in the analyses to be conducted for the SEIS. Written comments regarding the SEIS must be postmarked no later than December 19, 2018, and sent to the following address: Mr. Paul Gyamfi, Office of Planning and Design Quality, Public Buildings Service, National Capital Region, U.S. General Services Administration, 301 7th Street SW, Suite 4004, Washington, DC, 20407; or by email: [Paul.Gyamfi@gsa.gov](mailto:Paul.Gyamfi@gsa.gov) using the subject line: St. Elizabeths Master Plan Amendment #2. All emails must be received by 11:59 p.m. December 19, 2018.

Dated: November 7, 2018.

**Kristi Tunstall Williams,**

*Deputy Director, Office of Planning and Design Quality, Public Buildings Service, National Capital Region, U.S. General Services Administration.*

[FR Doc. 2018-25207 Filed 11-16-18; 8:45 am]

**BILLING CODE 6820-YI-P**



## Appendix B: Newspaper notices

PROOF OF PUBLICATION

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Alba Cortes well known to me to be BILLING SUPERVISOR of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date(s) at a cost of \$1,693.20 and was circulated in the Washington metropolitan area.

Published 1 time(s). Date(s): 16 of November 2018

Account 2010109989

Witness my hand and official seal this 16<sup>th</sup> day of November 2018

My commission expires 10/31/2019



MASTER PLAN AMENDMENT #2 FOR THE U.S. DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS IN SOUTHEAST WASHINGTON, DC Scoping and Public Involvement Notice for a Supplemental Environmental Impact Statement under the National Environmental Policy Act and Section 106 of the National Historic Preservation Act for the Proposed Master Plan Amendment #2 for the U.S. Department of Homeland Security Headquarters at St. Elizabeths West Campus in Southeast Washington, DC The U.S. General Services Administration (GSA) is proposing to amend the 2012 U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan to house DHS operating components at the St. Elizabeths West Campus in Southeast Washington, DC. GSA will prepare a Supplemental Environmental Impact Statement (SEIS) in accordance with Section 102 of the National Environmental Policy Act (NEPA) and with Section 106 of the National Historic Preservation Act in accordance with 36 CFR Part 800.8. NEPA requires a Federal agency to provide the public with an opportunity to participate in the process of analyzing the impact of Federal actions on the environment. Previous St. Elizabeths Master Plans and Environmental Impact Statements are available for review at <http://stelizabethsdevelopment.com/nepa.html>. PUBLIC SCOPING MEETING: An open house style public meeting will be held on November 29, 2018, from 6:30 p.m. to 8:30 p.m. at the R.I.S.E Demonstration Center on the St. Elizabeths East Campus, 2730 Martin Luther King Jr. Avenue, SE, Washington, DC. Please plan to attend anytime between 6:30 p.m. and 8:30 p.m. to learn more about the proposed action and to provide comments to the project team. WRITTEN COMMENTS: Interested parties are encouraged to provide written comments on the SEIS and Section 106 processes. The scoping period begins on November 19, 2018, and ends on December 19, 2018. Comments received during the scoping period will be considered in the analyses to be conducted for the SEIS. Written comments regarding the SEIS must be postmarked no later than

Ad # 12218727 Name STANTEC INC ATTN: CATHY ANADALE  
Class 820 PO# Authorized by

Size 140 Lines

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Account 2010109989

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December 19, 2018, and sent to the following address: Mr. Paul Gyamfi Office of Planning and Design

Quality Public Buildings Service National Capital Region U.S. General Services Administration 301 7th Street, SW # Room 4004 Washington, DC 20407 Comments can also be sent by email to paul.gyamfi@gsa.gov; email subject line: St. Elizabeths Scoping Comments. All emails must be received by 11:59 p.m. December 19, 2018. FOR FURTHER INFORMATION CONTACT: Paul Gyamfi, NEPA Compliance Specialist, at (202) 690-9252. Please contact Mr. Gyamfi if special assistance is needed to attend and participate in the scoping meeting.

## Holiday Classic, 'The Nutcracker,' Hits Silver Screen

*Includes Performance by Famed Ballerina Misty Copeland*

By Eunice Moseley  
Special to the Washington Informer

The holiday season has begun early this year as a fresh spin of the classic Christmas story whose characters include a young girl named Clara, dancing fairies, mice in battle and a mysterious nutcracker comes to theaters throughout the U.S.

The recently-released film, "The Nutcracker and the Four Realms," a modernized retelling of E.T.A. Hoffmann's short story "The Nutcracker and the Mouse King" and Marius Petipa's (the ballet's original choreographer) "The Nutcracker Ballet," stars MacKenzie Foy (from "The Twilight Saga") as Clara the Princess of the Four Realms, Jayden Fowora-Knight as The Nutcracker, Oscar-nominated Morgan Freeman as the Godfather and Misty Copeland, the famed, African-American ballerina of the American Ballet Theatre in a special performance.

The story follows Clara as she goes on a Christmas present hunt, thanks to Godfather Drosselmeyer, during which she finds a key in a land called The Four Realms – a place she later learns owes its beginnings to her mother, who created it and once ruled as its queen. Clara becomes convinced that the key can open a mysterious, golden, nut-shaped gift-box given to her by her mother prior to her death. And she believes that a message from her mother lies locked inside the box. But before she can use the key, it's stolen by a mouse – a subject of Queen Mother Ginger (portrayed by Helen Mirren), forced into isolation by the other three realms after the Four Realms Queen disappeared.

The tale of adventure also fea-

tures Academy Award-winner Keira Knightly as the Queen Sugar Plum Fairy, Eugenio Derbez as the Flower Realm King and Richard E. Grant as the Snow Realm King, along with the Lasse Hallstrom and Joe Johnston as the directors and co-producers Mark Gordon and Larry Franco.

More information about the Walt Disney Pictures/Mark Gordon Company production can be found at [www.Movies.Disney.com/the-nutcracker-and-the-four-realms](http://www.Movies.Disney.com/the-nutcracker-and-the-four-realms).

### MOSCOW BALLET DANCES 'NUTCRACKER' IN SPECTACULAR U.S. TOUR

For those who enjoy seeing the "Nutcracker" performed on stage, a special opportunity awaits as one of the world's highly-regarded ballet companies tours 45 U.S. cities throughout the months of November and December. The Moscow Ballet Theatre will present the "Great Russian Nutcracker," also titled the "Moscow Ballet Dove of Peace Tour featuring the Great Russian Nutcracker and Swan Lake" – brought to a city "near you" because of 100 dancers, 1,000 crew members and nine mega-trucks.

The "Great Russian Nutcracker" performances will unveil the premier of a new principal dancer, the Moscow Ballet Theatre's Rafael Urazov in its "Dove of Peace" and "Arabian" dance segments.

Urazov, after suffering a potentially career-ending knee injury, supplemented his two-years rehabilitation regiment by employing acrobatics and boxing to strengthen his muscles. He would incorporate many of the moves upon his return as a ballet dancer – moves that can be seen in

his role in the "Dove of Peace Tour."

This will be the first time that he dances in the "Dove of Peace" segment – one created exclusively for the Moscow Ballet Theatre that they would incorporate in 1993, reimagining the originally named piece, The Bird, as "The Dove," also choosing it as the signature of the company.

The "Great Russian Nutcracker" tour, with more stops scheduled in Canada, will visit a total of 100 cities in North America. The company will also reach out into communities through its "Dance with Us," engaging youth, 6 to 18, bringing them onstage and teaching them Russian ballet. It's estimated that they will reach over 6,000 American ballet dance students – youth who The Moscow Ballet Theatre has dubbed "Ambassadors of Peace for Moscow" as they "bridge cultural divides and spread the message of peace."

**Editor's Note:** "The Nutcracker," a two-act ballet with a score by Peter Tchaikovsky (op. 71), premiered in



**NUTCRACKER** Page 30

▲ Scenes from "The Nutcracker and the Four Realms." /Courtesy photos

MASTER PLAN AMENDMENT #2

**FOR THE U.S. DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS IN SOUTHEAST WASHINGTON, DC**

**Scoping and Public Involvement Notice**  
**for a Supplemental Environmental Impact Statement under the National Environmental Policy Act and Section 106 of the National Historic Preservation Act for the Proposed Master Plan Amendment #2 for the U.S. Department of Homeland Security Headquarters at St. Elizabeths West Campus in Southeast Washington, DC**

The U.S. General Services Administration (GSA) is proposing to amend the 2012 U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan to house DHS operating components at the St. Elizabeths West Campus in Southeast Washington, DC.

GSA will prepare a Supplemental Environmental Impact Statement (SEIS) in accordance with Section 102 of the National Environmental Policy Act (NEPA) and with Section 106 of the National Historic Preservation Act in accordance with 36 CFR Part 800.8. NEPA requires a Federal agency to provide the public with an opportunity to participate in the process of analyzing the impact of Federal actions on the environment. Previous St. Elizabeths Master Plans and Environmental Impact Statements are available for review at <http://stelizabethsdevelopment.com/nepa.html>.

**PUBLIC SCOPING MEETING:** An open house style public meeting will be held on **November 29, 2018, from 6:30 p.m. to 8:30 p.m. at the R.I.S.E Demonstration Center on the St. Elizabeths East Campus, 2730 Martin Luther King Jr. Avenue, SE, Washington, DC.** Please plan to attend anytime between 6:30 p.m. and 8:30 p.m. to learn more about the proposed action and to provide comments to the project team.

**WRITTEN COMMENTS:** Interested parties are encouraged to provide written comments on the SEIS and Section 106 processes. The scoping period begins on November 19, 2018, and ends on December 19, 2018. Comments received during the scoping period will be considered in the analyses to be conducted for the SEIS. Written comments regarding the SEIS must be **postmarked no later than December 19, 2018**, and sent to the following address:

Mr. Paul Gyamfi  
 Office of Planning and Design Quality  
 Public Buildings Service  
 National Capital Region  
 U.S. General Services Administration  
 301 7<sup>th</sup> Street, SW – Room 4004  
 Washington, DC 20407

Comments can also be sent by email to [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov); email subject line: St. Elizabeths Scoping Comments. **All emails must be received by 11:59 p.m. December 19, 2018.**

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**The**  
**AFRO**  
**American Newspapers**

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 LAUREL MD 20707

Account: 15714  
 Ad Number: 382350  
 Size: 3 X 7  
 Sales Rep: LOWE La'Tasha Owens  
 Words: 411  
 Lines: 177

<i>Cost of Ad</i>	<i>Payments</i>	<i>Total Due</i>
537.81	0.00	537.81
<i>Class:</i> 20 LEGAL NOTICES		<i>SubClass:</i>
<i>Description:</i> Master Plan Amendment #2		
Baltimore Classified		Nov 17

MASTER PLAN AMENDMENT #2

**FOR THE U.S. DEPARTMENT OF HOMELAND SECURITY  
HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS  
IN SOUTHEAST WASHINGTON, DC**

**Scoping and Public Involvement Notice  
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Elizabeths West Campus in Southeast Washington, DC**

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Mr. Paul Gyamfi  
Office of Planning and Design Quality  
Public Buildings Service  
National Capital Region  
U.S. General Services Administration  
301 7th Street, SW - Room 4004  
Washington, DC 20407

Comments can also be sent by email to [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov); email subject line: St. Elizabeths Scoping Comments. **All emails must be received by 11:59 p.m. December 19, 2018.** **FOR FURTHER INFORMATION CONTACT:** Paul Gyamfi, NEPA Compliance Specialist, at (202) 690-9252. Please contact Mr. Gyamfi if special assistance is needed to attend and participate in the scoping meeting.

## Appendix C: Mailing List

# Federal Elected Officials

The Honorable Rodney Frelinghuysen  
Chairman  
U.S. House of Representatives  
Committee on Appropriations  
2406 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Lou Correa  
Ranking Member  
U.S. House of Representatives  
HSC - Subcommittee on Oversight & Management  
Efficiency  
1039 Longworth House Office Building,  
Washington, DC 20515

The Honorable Bill Shuster  
Chairman  
U.S. House of Representatives  
Committee on Transportation and Infrastructure  
2165 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Brian Mast  
Chairman  
U.S. House of Representatives  
T&I - Subcommittee Coast Guard & Maritime  
Transportation  
2182 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Tom Graves  
Chairman  
U.S. House of Representatives  
Subcommittee on Financial Services & General  
Government  
2078 Rayburn House Office Bldg.,  
Washington, DC 20515

The Honorable Lucille Roybal-Allard  
Ranking Member  
U.S. House of Representatives  
Subcommittee on Homeland Security  
Committee of Appropriations  
2083 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Eleanor Holmes Norton  
U.S. House of Representatives  
Committee on Transportation & Infrastructure  
2136 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Anthony Brown  
U.S. House of Representatives  
1505 Longworth House Office Building,  
Washington, DC 20515

The Honorable Ron Johnson  
Chairman  
United States Senate  
Committee on Homeland Security & Governmental  
Affairs  
340 Dirksen Senate Office Building,  
Washington, DC 20510

The Honorable Nita Lowey  
Ranking Member  
U.S. House of Representatives  
Committee on Appropriations  
1016 Longworth House Office Building,  
Washington, DC 20515

The Honorable Trey Gowdy  
Chairman  
U.S. House of Representatives  
Committee on Oversight and Government Reform  
2157 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Peter A. DeFazio  
Ranking Member  
U.S. House of Representatives  
Committee on Transportation and Infrastructure  
2165 Rayburn House Office Building,  
Washington, DC 20515

The Honorable John Garamendi  
Ranking Member  
U.S. House of Representatives  
T&I - Subcommittee Coast Guard & Maritime  
Transportation  
2438 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Mike Quigley  
Ranking Member  
U.S. House of Representatives  
Subcommittee on Financial Services & General  
Government  
2458 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Steny H. Hoyer  
Minority Whip  
U.S. House of Representatives  
1705 Longworth House Office Building,  
Washington, DC 20515

The Honorable John K. Delaney  
U.S. House of Representatives  
1632 Longworth House Office Building,  
Washington, DC 20515

The Honorable John Barrasso  
Chairman  
United States Senate  
Committee on Environment & Public Works  
307 Dirksen Senate Office Building,  
Washington, DC 20510

The Honorable Claire McCaskill  
Ranking Member  
United States Senate  
Committee on Homeland Security & Governmental  
Affairs  
503 Hart Senate Office Building,  
Washington, DC 20510

The Honorable Michael McCaul  
Chairman  
U.S. House of Representatives  
Committee on Homeland Security  
2001 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Elijah E. Cummings  
Ranking Member  
U.S. House of Representatives  
Committee on Oversight and Government Reform  
2230 Rayburn House Office Building,  
Washington, DC 20515

Ms. Janice Bashford  
Legislative Director  
U.S. House of Representatives  
Office of Representative Karen Bass  
2241 Rayburn House Office Building,  
Washington, DC 20515

Mr. Elliot Doomes  
Counsel  
U.S. House of Representatives  
T&I - Subcommittee on Economic Development,  
Emergency Management and Public Buildings  
586 Ford House Office Building,  
Washington, DC 20515

The Honorable Kevin A. Yoder  
Chairman  
U.S. House of Representatives  
Subcommittee on Homeland Security  
Committee of Appropriations  
2433 Rayburn House Office Building,  
Washington, DC 20515

The Honorable Jamie Raskin  
U.S. House of Representatives  
431 Cannon House Office Building,  
Washington, DC 20515

The Honorable Barbara Comstock  
U.S. House of Representatives  
229 Cannon House Office Building,  
Washington, DC 20515

The Honorable Tom Carper  
Ranking Member  
United States Senate  
Committee on Environment & Public Works  
513 Hart Senate Office Building,  
Washington, DC 20510

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Vice President, COO  
Anacostia Economic Development Corporation  
1800 Martin Luther King Jr. Ave, SE, Suite #100  
Washington, DC 20020

Ms. Bernadette Ferrell  
Volunteer Coordinator  
UPO/Ralph Waldo "Petey" Greene Community  
Service Center  
2907 Martin Luther King Jr, Ave, SE,  
Washington, DC 20032

Mr. Sam Perry  
Oxon Hill Bicycle and Trail Club  
P.O. Box 81,  
Oxon Hill, MD 20750

## Private Citizens

Ms. Brenda Richardson  
3008 24th Pl SE,  
Washington, DC 20020

Reverend Kevin A. Kearney  
218 Malcolm X Ave, SE,  
Washington, DC 20032

Ms. Camilla Younger  
6617 7th Place, NW,  
Washington, DC 20012

Ms. Vernice A. Woodland  
537 Newcomb Street SE, #2  
Washington, DC 20032

Ms. Evelyn P. Wooden  
637 Raleigh Place, SE,  
Washington, DC 20032

Ms. Bobbie Jean Wills  
1324 Stevens Road SE,  
Washington, DC 20020

Ms. Kauita Williams  
1822 Bruce Place, SE,  
Washington, DC 20020

Ms. Donna L. Watts-Brighthayst  
1341 Ridge Place, SE,  
Washington, DC 20020

Ms. Lisa Watts  
1016 Anderson Place, SE,  
Washington, DC 20032

Ms. Safara Walker  
3312 Brothers Place, SE,  
Washington, DC 20032

Ms. Stella Sutton  
218 Newcomb Street, SE,  
Washington, DC 20032

Ms. Lynne Steele  
148 G Street, SW,  
Washington, DC 20024

Ms. Jewel Sims  
1342 Stevens Road, SE,  
Washington, DC 20020

Ms. Jeanne Shelton Gault  
605 Raleigh Place, SE,  
Washington, DC 20032

Ms. Mary Ross  
250 Newcomb Street SE,  
Washington, DC 20032

Ms. Tecola Plowden  
2817 Pomeroy Road, SE,  
Washington, DC 20020

Ms. Akyivia Pinkney  
2501 Astilbe Way,  
Odenton, MD 21113

Ms. Nikki Peele  
210 Oakwood Street, SE, #204  
Washington, DC 20032

Ms. Rosemary Payton  
747 Alabama Ave, SE,  
Washington, DC 20032

Ms. Marcia Parkes  
1323 Volley Place, SE,  
Washington, DC 20020-5715

Ms. Robin Myers  
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Ms. Yauhannah Millepps  
4660 Martin Luther King Jr Ave, SW, A909  
Washington, DC 20032

Ms. Frances McMillen  
411 Brandon Ave, Apt. #54  
Centreville, VA 22903

Ms. LaToyai Martin  
4317 3rd Street SE, #201  
Washington, DC 20032

Ms. Valerie Martin  
1917 16th Street, SE,  
Washington, DC 20020

Ms. Virginia Major  
3301 5th Street, SE,  
Washington, DC 20032-5423

Ms. Armehl Lyon  
1225 Talbert Street,  
Washington, DC 20020

Ms. Mary Locke  
5003 Worthington Drive,  
Bethesda, MD 20816

Ms. Geraldine Law  
2715 Wade Road, SE,  
Washington, DC 20030

Ms. Susan Kennedy  
2640 Wade Road, SE, #24  
Washington, DC 20020

Ms. Theresa F. Kelly  
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Oxon Hill, MD 21769

Ms. Lillian Jowers  
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Ms. Sarah Joseph  
19 Eye Street, NW,  
Washington, DC 20001

Ms. Pamela Jones  
3313 Martin Luther King Jr. Ave SE,  
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Ms. Angela D. Johnson  
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Washington, DC 20020

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Washington, DC 20032

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Washington, DC 20032

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Washington, DC 20020

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Washington, DC 20002

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3508 Rodman Street, NW,  
Washington, DC 20008

Ms. Beverly Hampton  
3612 Martin Luthur King Ave SE,  
Washington, DC 20032

Ms. Stephanie Guion  
1854 N. Columbus Street,  
Arlington, VA 22207

Ms. Laura A. Goggans  
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Washington, DC 20032

Ms. Wendy Glenn  
1613 Unit #4,  
Washington, DC 20002

Ms. Bettye Felder  
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Washington, DC 20020

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3016 7th St SE,  
Washington, DC 20032

Ms. Carla Davis  
3210 8th St SE, Unit 9  
Washington, DC 20032

Ms. Turusa Curry  
PO Box 54213,  
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Washington, DC 20020

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Washington, DC 20032

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Ms. Andrene Bryan  
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Washington, DC 20032

Ms. Flora Brown  
1236 Savannah Street SE,  
Washington, DC 20032

Ms. Kabir Bhulyan  
2927 Martin Luther King Ave SE,  
Washington, DC 20032

Ms. Anna Bentley  
2900 S Quincy St Suite 200,  
Arlington, VA 22206

Ms. Ethel Lee Barksdale  
3300 18th St SE, #301  
Washington, DC 20020

Ms. Ellen Allen  
629 Raleigh Pl SE,  
Washington, DC 20032

Mr. Alex Woldu  
2007-B Martin Luther King Jr Ave,  
Washington, DC 20020

Mr. David Wilson  
329 F Street, NE,  
Washington, DC 20002

Mr. Jon Whitney  
600 Pennsylvania Ave, SE, Suite 400  
Washington, DC 20003

Mr. Tyrone White  
633 Raleigh Place, SE,  
Washington, DC 20032

Mr. Leonard Watson, Sr.  
2437 Wagner Street, SE,  
Washington, DC 20020

Mr. Aaron Ward  
2513 Stanton Road, SE,  
Washington, DC 20020-4408

Mr. Joseph Waker  
2805 Jasper Street, SE,  
Washington, DC 20020

Mr. Moddie Turacy  
3222 M Street, NW, #140  
Washington, DC 20007

Mr. James Tolbert  
254 Newcomb Street SE,  
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Mr. George Tobias  
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Mr. James W. Thomas  
800 Malcom X Ave SE,  
Washington, DC 20032

Mr. Neil Sullivan  
303 Windsor Street,  
Silver Spring, MD 20910

Mr. Alfred Strance  
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Washington, DC 20020

Mr. Marlon Smoker  
641 Elliot Street, NE,  
Washington, DC 20002

Mr. Kenton D. Smith  
2944 2nd Street, SE, #14  
Washington, DC 20032

Mr. William Skelsey  
c/o ASG 800 Eye Street, NW, #600  
Washington, DC 20001

Mr. Brian Sheridan  
8 Woodmere Circle,  
Middletown, MD 21769

Mr. Fahim Shabazz  
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Washington, DC 20032

Mr. Calvin Reid  
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Mr. Joseph Quartermah  
2602 Berkley Street,  
Temple Hills, MD 20748

Mr. Gordon Pickering  
2208 Durbin Court,  
Bowie, MD 20721

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Washington, DC 20020

Mr. Steve Morris  
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Washington, DC 20032

Mr. Robert L. Moore  
225 Newcomb St. SE,  
Washington, DC 20032

Mr. Perry Moon  
3371 Brothers Place, SE,  
Washington, DC 20032

Mr. John Lesesne  
1001 Savannah Street, SE,  
Washington, DC 20032

Mr. Jonathan Krall  
6a East Mason Ave,  
Alexandria, VA 22301

Mr. Ricardo Kingsburg  
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Washington, DC 20020

Mr. Donald Joyner  
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Oxon Hill, MD 20745

Mr. Nathaniel Jones  
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Mr. Henry Johnson  
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Mr. Michael Jelen  
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Washington, DC 20015

Mr. Melvin Hines  
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Washington, DC 20020

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Washington, DC 20020

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Washington, DC 20010

Mr. Larry Greenhill, Jr.  
PO Box 76803,  
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Washington, DC 20020

Mr. Raymond Gamble  
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Washington, DC 20009-2885

Mr. Jeff Epperson  
1101 Pennsylvania Ave NW, #600  
Washington, DC 20004

Mr. Thom Ennen  
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Washington, DC 20024

Mr. Ali Edmondson  
720 Hobart Place NW,  
Washington, DC 20001

Mr. Wallace H. Deuz  
3010 8th Street, SE,  
Washington, DC 20032

Mr. Derek Davis  
4646 Livingston Rd SE,  
Washington, DC 20032

Mr. Levi Daniels, Jr  
262 Newcomb Street SE,  
Washington, DC 20032

Mr. Marc Currie  
4555 Overlook Ave SW,  
Washington, DC 20375

Mr. Wilfred Christian  
133 S Street, NW, Unit B,  
Washington, DC 20001-1129

Mr. James Chope  
603 1/2 A Street SE,  
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Mr. Arthur Bradley  
3736 Horner Place SE,  
Washington, DC 20032

Mr. Gregory Billing  
3166 17th St. NW,  
Washington, DC 20009

Mr. Jeffrey Bassett  
206 Trenton Place, #201  
Washington, DC 20032

Mr. Leroy Barley  
912 Alabama Ave SE,  
Washington, DC 20032

Mr. Jeremy Barksdale  
2435 14th Street NE,  
Washington, DC 20018

Mr. Chris Baker  
1514 Mississippi Ave SE,  
Washington, DC 20032

Mr. and Mrs. Lawrence Mealy  
3348 Brothers Place, SE,  
Washington, DC 20032-1689

Mr. Muhammad Akhtaruzzaman  
2927 Martin Luther King Jr Ave, SE,  
Washington, DC 20032

K. Pagotto  
500 8th Street, NW,  
Washington, DC 20004-2131

J. Muse  
3109 Martin Luther King Jr Ave, SE, #9  
Washington, DC 20032

Ms. Neida Perez  
2609 Douglas Road, SE, #403  
Washington, DC 20020

## Appendix D: Meeting Handout



## national environmental policy act

The National Environmental Policy Act of 1969, commonly referred to as NEPA, is the nation's legislative charter for protection of the environment. NEPA provides for the consideration of environmental issues in Federal agency planning and decision-making. NEPA requires Federal agencies to prepare an Environmental Assessment (EA) for actions that are not likely to significantly affect the quality of the human environment.

## national historic preservation act – section 106

Section 106 of the National Historic Preservation Act of 1966 requires that Federal agencies take into account the effects of their actions on any district, site, building, structure, or object listed in, or eligible for inclusion in, the National Register of Historic Places. GSA has initiated and is conducting related consultation under Sections 106 and 110 of the National Historic Preservation Act (NHPA) in accordance with 36CFR, Part 800.8. for Amendment #2 of the Master Plan, consistent with the Programmatic Agreement signed on December 9, 2008.

## public involvement process

Scoping	September 15 – October 15, 2016
GSA Publish Draft EA	Winter 2016/2017
Public Review of Draft EA	30 days
GSA Publish Final EA	Spring 2017
Public Review of Final EA	30 days

## purpose of scoping

Scoping is an early and open mechanism for developing the range of issues to be addressed in the EA and Section 106 process. It allows the public to help define, prioritize, and convey stakeholder and community issues to the agency through oral and written comments. A critical element of the scoping process is the public meeting during which comments and concerns are officially documented.



## send written comments to:

Ms. Stephanie Hamlett, Regional Environmental Quality Advisor  
U.S. General Services Administration National Capital Region  
301 7th St., SW, Room 4004  
Washington, DC 20407

[stephanie.hamlett@gsa.gov](mailto:stephanie.hamlett@gsa.gov)

Subject: St. Elizabeths Environmental Assessment Scoping Comments

All scoping comments are due to GSA by October 15, 2016.

(Mailed comments must be postmarked no later than October 15, 2016.)  
Section 106 comments will be accepted throughout the consultation process.

For more information, please visit the project website:  
<http://www.stelizabethsdevelopment.com/nepa.html>

## Environmental Assessment and Section 106 of the National Historic Preservation Act

for the

**Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan Amendment #2**

Washington, DC



**Public Scoping Meeting**

September 29, 2016

## project

The U.S. General Services Administration (GSA) is amending the 2012 Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan to more efficiently house DHS and its operating components at the St. Elizabeths West Campus only. In addition, GSA is reevaluating transportation and parking improvements for the consolidation of the DHS Headquarters at St. Elizabeths.

## background

In 2008, GSA completed an Environmental Impact Statement, Programmatic Agreement, and Master Plan for the DHS Headquarters Consolidation at St. Elizabeths. NCPIC approved the master plan in January 2009. GSA amended the Master Plan in 2012 to include the development of a portion of the DHS Headquarters Consolidation on the North Campus Parcel of the St. Elizabeths East Campus. In addition, the proposed action is needed to reduce the cost of the Headquarters consolidation and to shorten the duration of construction so that the Headquarters can be fully occupied in a timely manner.

## need

DHS previously identified a need to consolidate a minimum critical mass of 4.5 million GSF of secure office space, plus parking, to meet the Department's mission requirements for its consolidated Headquarters while developing a more cost-effective, efficient, and functional real estate portfolio in the National Capital Region.

The proposed action is needed to increase efficiency, reduce costs, and accelerate completion of the DHS consolidation. Alternative workplace environments that use flexible workspace design, alternative work schedules, and mobile or remote teleworking strategies will allow GSA and DHS to more efficiently accommodate DHS' mission while using less building square footage. In addition, the proposed action is needed to reduce the cost of the Headquarters consolidation and to shorten the duration of construction so that the Headquarters can occupy the campus in a timely manner.

## site

The St. Elizabeths West Campus consists of 176 acres and 54 buildings constructed between the 1850s and 1960s, as well as the US Coast Guard Headquarters building that was completed in 2013. The site is bounded by residential communities to the north and south, Martin Luther King Jr, Avenue (MLK Ave.) to the east, I-295 to the west, and Shepherd Parkway to the southwest. A Civil War cemetery is located on the western slope overlooking Joint Base Anacostia – Bolling. The West Campus, along with the St. Elizabeths East Campus, is a National Historic Landmark. Phase I of the campus redevelopment is complete. Renovation of the Center Building on the St. Elizabeths West Campus is underway and the balance of the buildings on the campus will be renovated in a future phase.



## project objectives

- Consolidate DHS operating components on the St. Elizabeths West Campus
- Provide functional and efficient office and support spaces consistent with revised government space-management policies, while maintaining the historic character of St. Elizabeths West Campus
- Reduce the cost of the Headquarters consolidation
- Shorten the duration of construction so that the DHS Headquarters can be occupied in a timely manner
- Reevaluate transportation and parking improvements for the consolidated Headquarters.

## alternatives

GSA will be considering a range of alternatives for the revision to the Master Plan which has been required by Congress. In the EA, GSA will analyze the impacts of an Action Alternative, as well as the no action alternative, on social, economic, and environmental conditions.

## potential topics

Potential topics to be studied in this EA are as follows:

- Transportation and parking
- Historic buildings
- Historic landscapes
- Significant viewsheds
- Potential below ground resources (archaeology)
- Geology, soils, and topography
- Water resources
- Vegetation and wildlife
- Hazardous materials
- Air quality
- Noise
- Land use planning
- Economic conditions
- Environmental justice
- Community facilities and service
- Pedestrian circulation



## Appendix E: Display Boards





at St. Elizabeths

# WELCOME

to the Public Scoping Meeting for

GSA's Master Plan Amendment #2 for the  
Department of Homeland Security  
Headquarters Consolidation  
at St. Elizabeths

November 29, 2018

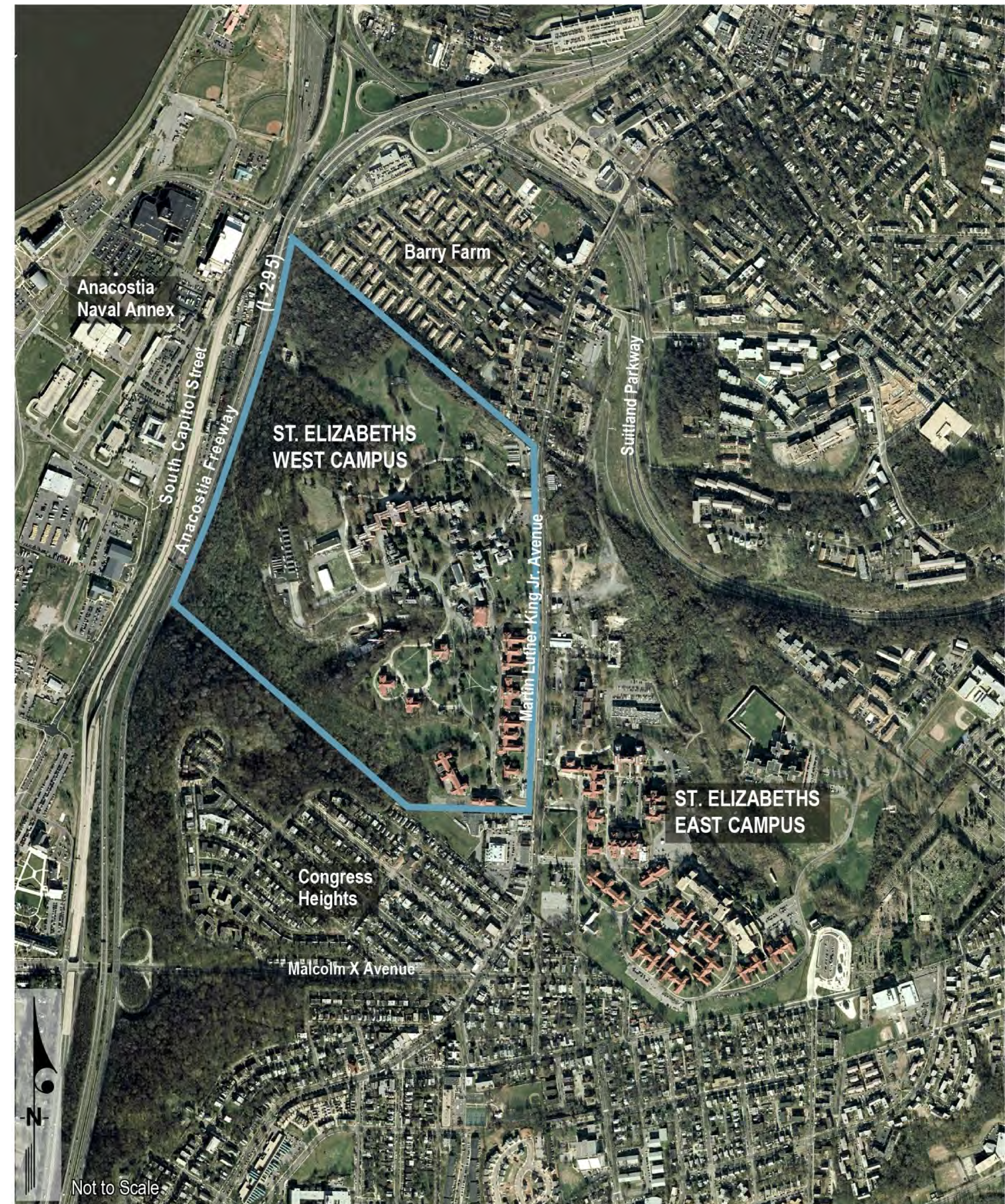




# Project Location

The St. Elizabeths West Campus is located in Southeast Washington, DC, and bounded by:

- I-295 to the West
- Barry Farm Community to the North
- Martin Luther King Jr. Avenue and the St. Elizabeths East Campus to the East
- The Shepherd Parkway and Congress Heights Neighborhood to the South





# Purpose of Tonight's Meeting

- A Public Scoping Meeting for Master Plan Amendment #2 was held in 2016. Since that time, GSA has reevaluated alternatives to reflect the current condition of the historic buildings on the campus.
- In addition, a new development area adjacent to the USCG Headquarters has been identified.
- These changes will result in significant impacts to cultural resources.
- Therefore, GSA is now preparing a Supplemental EIS and reinitiating the project scoping process

2



U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# Proposed Action

- The Master Plan for the Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths was completed in 2008 and amended in 2012 (Master Plan Amendment #1)
- GSA proposes to amend the 2012 Master Plan.
- In 2012 GSA planned for development on the east and west campuses.
- Today, in Master Plan Amendment #2, GSA proposes to consolidate DHS on the St. Elizabeths West Campus only.

3



U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# Purpose and Need

- The purpose of the proposed action is to amend the 2012 U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan to efficiently house DHS and its operating components on the St. Elizabeths West Campus.
- The proposed action is needed to improve efficiency, reflect the current condition of the historic buildings, reduce costs, and accelerate completion of the DHS consolidation.



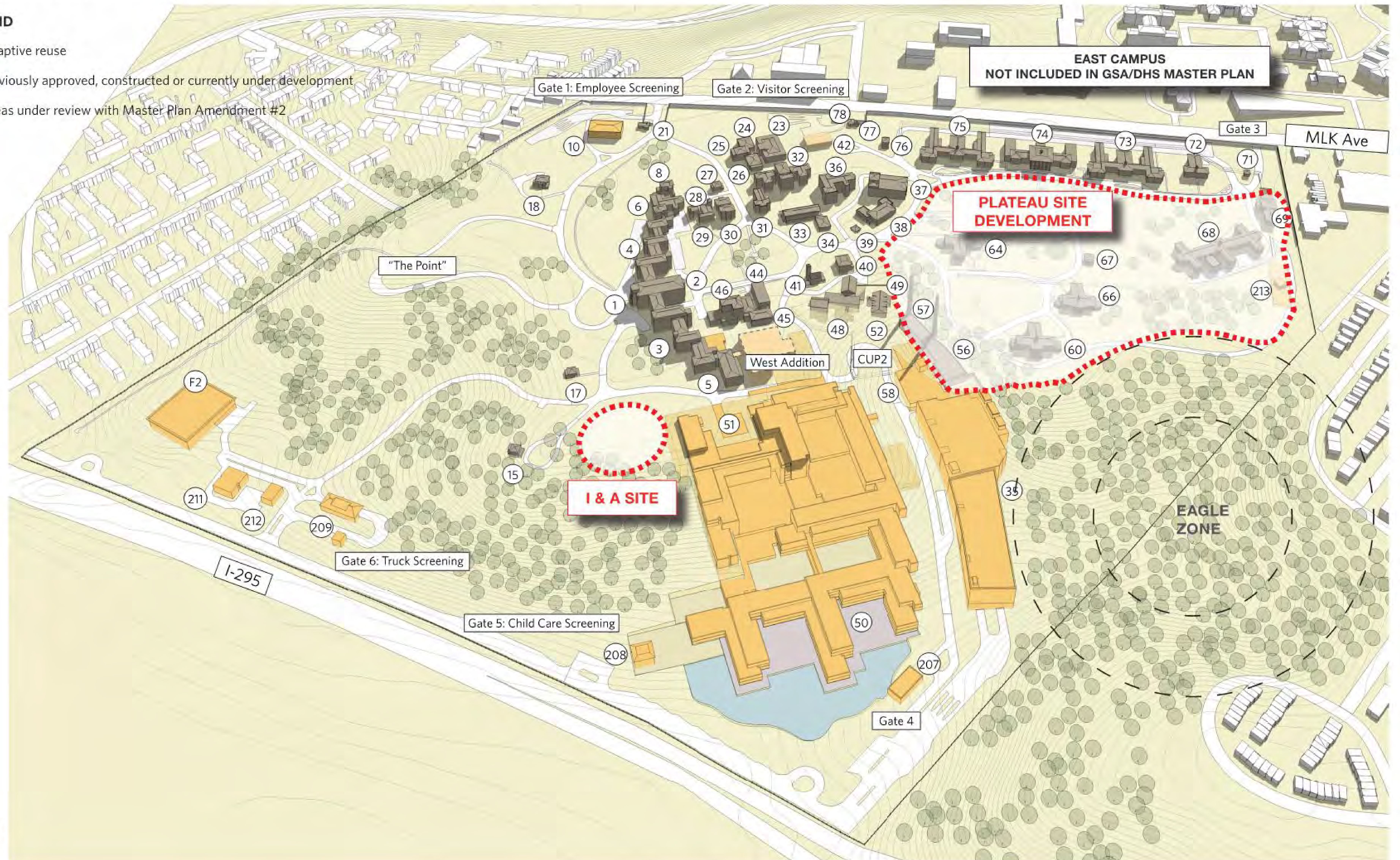


# Proposed Master Plan Amendment #2

## 2018 MASTER PLAN AMENDMENT #2 | AREAS UNDER REVIEW

### LEGEND

- Adaptive reuse
- Previously approved, constructed or currently under development
- Areas under review with Master Plan Amendment #2



U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# St. Elizabeths West Campus Development

## PROJECT STATUS | ILLUSTRATIVE SITE PLAN

### PROJECT STATUS KEY:

- ## Project completed
- ## Project underway
- ## Project in future

### ROADWAY IMPROVEMENT PROJECTS:

- A Firth Sterling intersection
- B On-site Access Road
- C I-295/Malcolm X Interchange
- D MLK widening



U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# Preliminary Site Concepts | Test Fits

## PRELIMINARY SITE CONCEPTS | TEST FITS

### PLATEAU SITE:

#### OPTION 1 - "COMPACT"

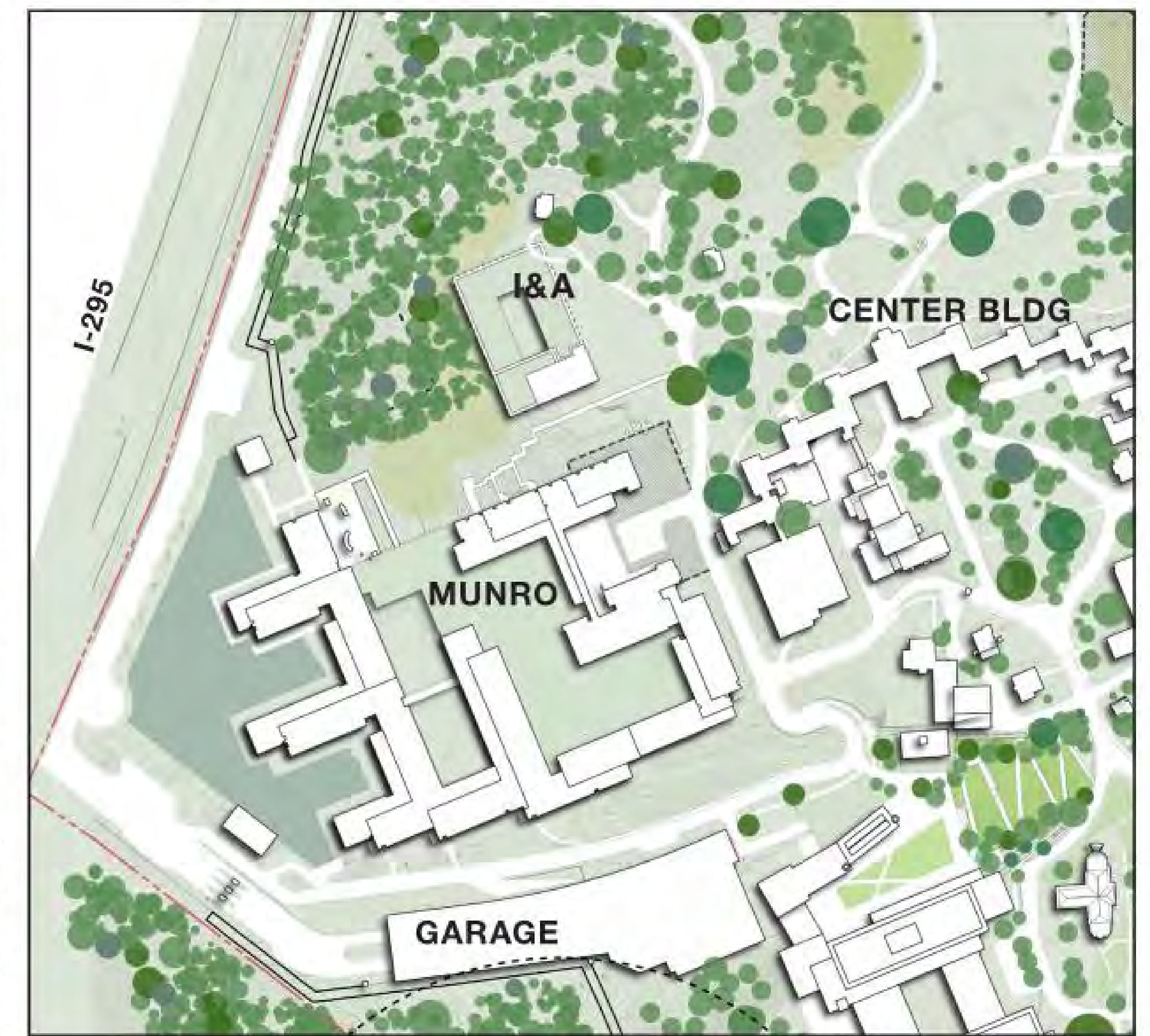


#### OPTION 2 - "DISPERSED"



### I & A SITE:

#### OFFICE OF INTELLIGENCE AND ANALYSIS



OPTIONS 1 AND 2 ILLUSTRATE THE POTENTIAL NEW CONSTRUCTION ON THE PLATEAU SITE THAT WOULD REPLACE HISTORIC BUILDINGS #60, 66, 67, 68 AND 69.

THE PROPOSED NEW CONSTRUCTION AT THE I&A SITE WOULD BE PLACED IN THE FIELD TO THE NORTH OF MUNRO AND WEST OF THE CENTER BUILDING.



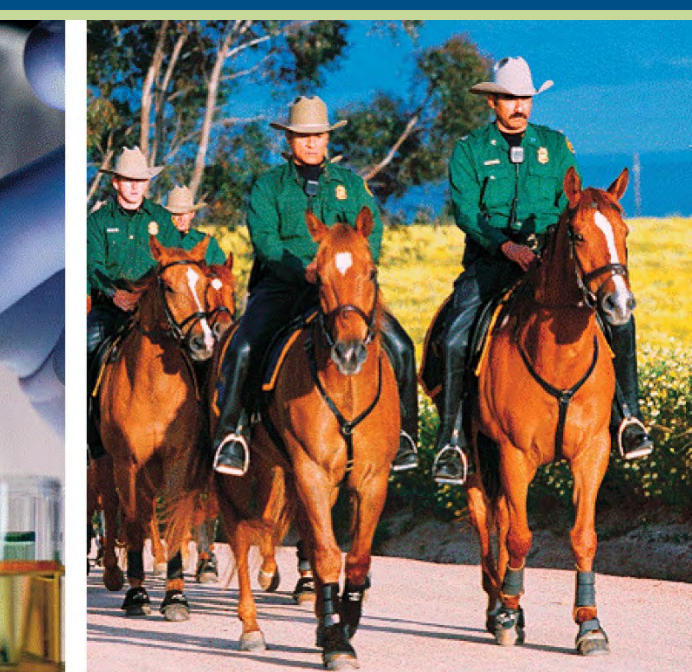


# National Environmental Policy Act Process

per the Council on Environmental Regulations (40 CFR 1500-1508)



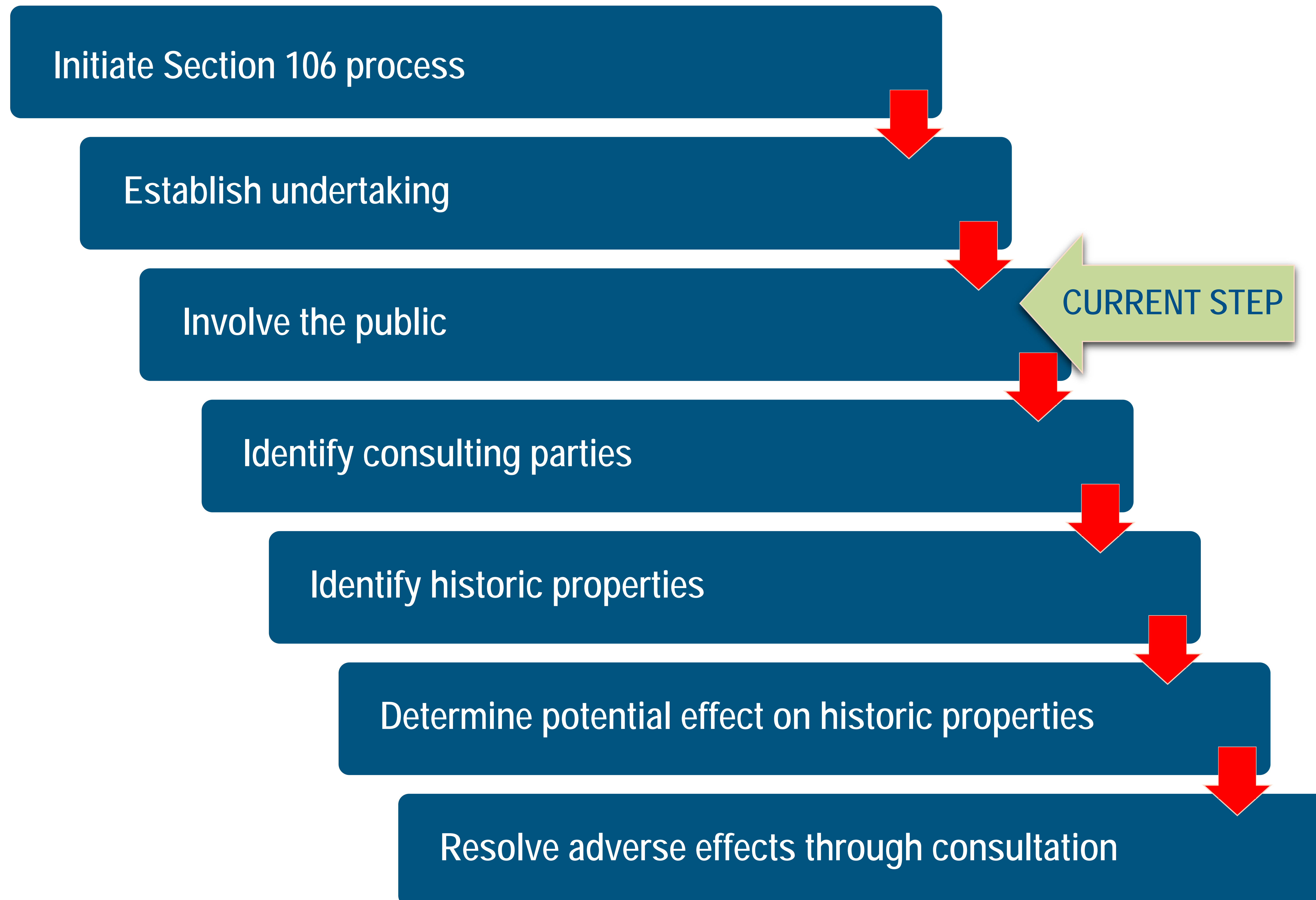
U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# National Historic Preservation Act

## Section 106 Process





# Topics for Study under NEPA & NHPA

- Transportation and parking
- Historic buildings
- Historic landscapes
- Significant viewsheds
- Potential below ground resources (archaeology)
- Geology, soils, and topography
- Water resources
- Vegetation and wildlife
- Hazardous materials
- Air quality
- Noise
- Land use planning
- Economic conditions
- Environmental justice
- Community facilities and service
- Utilities
- Pedestrian circulation

10



U.S. Department of Homeland Security  
Headquarters at St. Elizabeths





# How To Comment

## Submit comments tonight:

Write your comments on the comment cards provided and place them in a comment box at the entrance

## Submit comments electronically to:

[Paul.gyamfi@gsa.gov](mailto:Paul.gyamfi@gsa.gov)

## Mail comments to:

Attention: Mr. Paul Gyamfi  
Office of Planning and Design Quality  
Public Buildings Service  
National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW, Room 4004  
Washington, DC 20407

**All comments are due to GSA by December 19, 2018**





## Appendix F: Sing-In Sheets



# Public Scoping Meeting

## Sign-in Sheet

November 29, 2018

Name	Organization	Email
Chyla Evans	ANC 8002 Commissioner	Chylaevans@gmail.com
Brenda Jones	W8 Residents	
Aaron Zimmerman	DOT - PSD	aaron.zimmerman@dc.gov
ED FISHER	DMPEI	ED.FISHER@DC.GOV
Kristin Taddei	Casey Trees	ktaddei@caseytrees.org
Patrice Higgins	US Coast Guard	patrice.m.higgins@uscg.mil
John Hawkins	DHS	John.hawkins@hq.dhs.gov
John Coles	DHS	John.Coles@HQ.DHS.GOV

U.S. Department of Homeland Security Headquarters



at St. Elizabeths

# Public Scoping Meeting

## Sign-in Sheet

November 29, 2018

Name	Organization	Email
Mary S. Cuthbert	ANC SC-Church	Cuthbert@AFGEORy
Danzelle Abikhan	JSA LLC	danzelle@jsallc.com
Mustafa Abdul-Salam	ANC SC Commissioner	yeduman@gmail.com
Lajuan Stevens	GSA	Lajuan.stevens@gsa.gov
Percy Moon	FSFIC	pmoon@fsfic.org
Kathryn Kolbe	DHS	kathryn.kolbe@hq.dhs.mil
Susan Hathaway	DHS	susan.hathaway@hq.dhs.mil
Mr. Bro, C. G. Woodard	EL V WARD #8	CITIZEN 202-491-3856

U.S. Department of Homeland Security Headquarters



at St. Elizabeths

## Appendix G: Scoping Comments Received

**From:** Paul Gyamfi - WPDBA  
**To:** [Glynn, Joan](#); [Estes, Liz](#)  
**Subject:** Fwd: St. Elizabeths Scoping Comments  
**Date:** Tuesday, December 18, 2018 12:44:59 PM

---

St. Es FYI

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
301 7<sup>th</sup> Street, SW  
Room 4004  
Washington, DC 20407  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

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

**From:** **Kirsten B. Kulis** <[kkulis@achp.gov](mailto:kkulis@achp.gov)>  
**Date:** Tue, Dec 18, 2018 at 11:16 AM  
**Subject:** St. Elizabeths Scoping Comments  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov) <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>  
**Cc:** Nancy Witherell <[nancy.witherell@gsa.gov](mailto:nancy.witherell@gsa.gov)>

Dear Mr. Gyamfi,

Please include my contact information (below) in your mailing/e-mailing lists for the Supplemental Environmental Impact Statement (SEIS) for St. Elizabeths. Thank you for your attention to this request.

Sincerely,

**Kirsten B. Kulis**

**GSA Liaison**

LEED® Green Associate

**Advisory Council on Historic Preservation**

**From:** Paul Gyamfi - WPDBA  
**To:** [Glynn, Joan](#); [Shelly Jones - WPDBA](#); [Estes, Liz](#)  
**Subject:** Fwd: St. Elizabeth's Master Plan SEIS  
**Date:** Monday, December 3, 2018 12:29:27 PM

---

St. E's comment

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
301 7<sup>th</sup> Street, SW  
Room 4004  
Washington, DC 20407  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

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

**From:** **Upchurch, Sara H. EOP/CEQ** <[Sara.H.Upchurch@ceq.eop.gov](mailto:Sara.H.Upchurch@ceq.eop.gov)>  
**Date:** Wed, Nov 28, 2018 at 5:35 PM  
**Subject:** St. Elizabeth's Master Plan SEIS  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov) <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>

Good evening, Mr. Gyamfi – We received the letter indicating that GSA is preparing a Supplemental Environmental Impact Statement (SEIS) for the OHS Headquarters Consolidation at St. Elizabeth's Master Plan. We understand that you will be holding a scoping meeting tomorrow, November 29, 2018. We are interested in hearing about the results of that meeting and receiving any updates on this SEIS. We hope the meeting is successful!

**Sara Upchurch**

**Deputy Associate Director for NEPA**

**Executive Office of the President**

**Council on Environmental Quality**

**(202) 881-7218 [CEQ cell]**

202.517.0217 O

202.517.6384 F

[kkulis@achp.gov](mailto:kkulis@achp.gov)

[www.achp.gov](http://www.achp.gov)

<https://www.achp.gov/gsa>

401 F Street NW, Suite 308

Washington DC 20001-2637

(202) 517-0200 (Main Number)

Check out ACHP's *Guidance on Use of Real Property Restrictions or Conditions in the Section 106 Process to Avoid Adverse Effects* [www.achp.gov/digital-library-section-106-landing/guidance-use-real-property-restrictions-or-conditions-section](http://www.achp.gov/digital-library-section-106-landing/guidance-use-real-property-restrictions-or-conditions-section)



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

December 19, 2018

Mr. Paul Gyamfi  
Office of Planning and Design Quality  
Public Buildings Service  
U.S. General Services Administration  
301 7<sup>th</sup> Street, SW- Room 4004  
Washington, D.C. 20407

Re: Scoping for a Supplemental Environmental Impact Statement to amend the 2012 U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan for housing DHS on the St. Elizabeth's West Campus, Washington D.C. (December 2018)

Dear Mr. Gyamfi:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) is responding to the General Services Administration's (GSA) request for scoping suggestions on the planned Supplemental Environmental Impact Statement (SEIS) for the Department of Homeland Security (DHS) Headquarters Consolidation. The SEIS is an amendment to the 2012 U.S. DHS Headquarters Consolidation at St. Elizabeths 2012 Final Master Plan which amended the 2009 DHS Consolidation Final Master Plan. This SEIS follows the Final EIS prepared by GSA in March 2012. EPA reviewed and commented on the DEIS on March 2, 2011 and the FEIS on April 2, 2012.

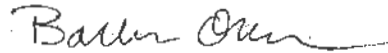
This Project intends to increase space utilization on the St. Elizabeths West Campus, reflect the current condition of historic buildings, reduce costs, and accelerate completion of the DHS consolidation. The SEIS intends to evaluate the potential consequences on the human and natural environment resulting from more efficiently housing DHS and its operating components on the St. Elizabeths West Campus.

EPA recommends the SEIS include the purpose and need, alternatives analyzed, avoidance and minimization of resources, hazardous materials, and cumulative impacts of the proposed project. In each alternatives analysis, natural, biological, and cultural resources should be thoroughly considered, as well as safety and environmental hazards. EPA suggests community impacts from the project and its construction also be evaluated, avoided, and minimized. We recommend this include noise, light, and potential traffic impacts during construction that may occur as a result of the Project. As this is a Supplemental EIS, EPA recommends that the document reference relevant information from previous EISs clearly and appropriately. EPA has included the following comments for your consideration in the development of the EIS (enclosure).



Thank you for the opportunity to provide scoping comments for this project. Please feel free to coordinate with EPA during development of the NEPA study. We look forward to receiving the EIS and other future analysis done in compliance with NEPA. If you have questions, the contact for this project is Nora T. Hwang; she can be reached at 215-814-2728 or [hwang.nora@epa.gov](mailto:hwang.nora@epa.gov).

Sincerely,



Barbara Okorn  
Acting NEPA Team Leader  
Office of Environmental Programs

Enclosure (1)

**Technical Comments**  
Amendment to 2012 DHS Headquarters Consolidation at St. Elizabeths Master Plan  
Washington, D.C.

**Purpose and Need**

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

**Alternatives Analysis**

As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR §1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the “no action” alternative be clearly presented in a comparative form for easy analysis by the reader. Within the alternatives analysis, the alternatives should vary enough to provide a significant difference and to be considered and compared with each other. The rationale for the selection of the preferred alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, it is suggested that reasons for their elimination be given.

**Land Use and Applicable Regulation**

It is recommended that the project area be described in detail and quantified, specifying the type and acreage of land impacted as well as a description of the existing buildings on the site including their current and past use. EPA suggests that the SEIS address future land development plans of the site aside from the alternatives proposed and if there are restrictions on future site development. Please also indicate the capacity/density/increase of employees proposed for each alternative. If there are spaces outside St. Elizabeths West Campus that DHS components intend to occupy, please include this information and the associated density reduction on St. Elizabeths. EPA also suggests GSA include if DHS is proposing to relocate personnel or functions from East Campus to West Campus.

Furthermore, please discuss any permits required before commencement of the project. This may include a Section 404/Section 10 permit from the Corps of Engineers, state water quality certification, and local construction and zoning permits. In addition to NEPA, other laws, regulations, permits, licenses and Executive Orders may be applicable to the Proposed Action (some are discussed in more detail below). A summary of applicable regulatory requirements and approvals with which the Proposed Action must demonstrate compliance should be discussed in the SEIS.

## **ENVIRONMENTAL IMPACTS**

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

Some useful information can be gleaned from on-line tools, such as:

EnviroMapper: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system> - The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases

Envirofacts: <https://www3.epa.gov/enviro> - Includes enforcement and compliance information

NEPAssist: <https://www.epa.gov/nepa/nepassist> - NEPAssist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. The web-based application draws environmental data dynamically from EPA Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest.

303(d) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>

Watershed Resources Registry: <https://watershedresourcesregistry.org/index.html>. This newly released mapping and screening tool prioritizes areas for preservation and restoration of wetlands, riparian zones, terrestrial areas, and stormwater management across several states in the mid-Atlantic region, including Pennsylvania. This tool is useful for planners to access environmental data to avoid impacting natural areas and identify optimal mitigation areas.

### **Air Resources**

*Attainment/Non-attainment:* EPA, under the requirements of the 1970 Clean Air Act (CAA) as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) for six contaminants, referred to as criteria pollutants (40 CFR 50). These are: ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter (PM), lead (Pb), and sulfur dioxide (SO<sub>2</sub>). Particulate matter is divided into two classes, coarse particulate matter (PM<sub>10</sub>), particulates between 2.5 and 10 microns in diameter, and fine particulate matter (PM<sub>2.5</sub>), particles less than 2.5 microns in diameter. The SEIS should identify areas that meet the NAAQS standard for a criteria pollutant as well as those areas where a criteria pollutant level exceeds the NAAQS.

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

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

## Water Resources

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

*Groundwater:* It is recommended that the principal aquifers in the region be identified and described. All wells, both public and private, that could potentially be affected by the project should be identified. We recommend that areas of groundwater recharge in the vicinity also be identified and any potential impacts from the proposed action examined. If groundwater contamination is present, it is recommended that the groundwater gradient and transport direction be determined and identified for the area, and potential discharge locations or contaminant sources be identified.

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

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

*Wetlands:* Wetlands present on, or immediately surrounding the site should be delineated according to the 1987 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Avoiding impacts to wetlands is always preferred and all options should be exhausted before resorting to wetland impact. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. We recommend that the SEIS analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement, if wetlands are impacted as a result of the Proposed Action. The jurisdictional determination may be included in the SEIS as an appendix. Furthermore, a map of water resources present onsite with an overlay of the Preferred Alternative would be useful to include. If wetlands are not present on the site, as applicable, please provide necessary information for any nearby resources, to be able consider secondary effects.

*Stormwater Management/Low Impact Development:* Stormwater runoff in urban and developing areas is one of the leading sources of water pollution in the United States. In recognition of this issue, Congress enacted Section 438 of the Energy Independence and Security Act of 2007 (EISA) to require federal agencies to reduce stormwater runoff from federal development projects to protect water resources. EPA published *Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act*.

The intent of Section 438 of the EISA is to require federal agencies to develop and redevelop applicable facilities in a manner that maintains or restores stormwater runoff to the maximum extent technically feasible. Implementation of Section 438 of the EISA can be achieved through the use of the green infrastructure/low impact development (GI/LID); infrastructure tools described in the Technical Guidance ([www.epa.gov/owow/nps/lid/section438](http://www.epa.gov/owow/nps/lid/section438)). For more information on specific GI/LID practices and how they function, visit: [www.epa.gov/greeninfrastructure](http://www.epa.gov/greeninfrastructure) and [www.epa.gov/nps.lid](http://www.epa.gov/nps.lid). The intention of the statute is to maintain or restore site hydrology during the development or redevelopment process. This requirement is intended to ensure that receiving waters are not negatively impacted by changes in runoff temperature, volumes, durations and rates resulting from federal projects. The fundamental principle of the Technical Guidance is to employ systems and practices that use or mimic natural processes to: 1) infiltrate and recharge, 2) evapotranspire, and/or 3) harvest and use precipitation near to where it falls to earth. Implementation of these stormwater performance requirements in EISA Section 438 provides numerous environmental and economic benefits in addition to reducing the volume of stormwater runoff. It is recommended that design incorporate features to minimize runoff and consider potential retrofit for any areas that would benefit from LID.

*Floodplains:* Floodplain encroachments should be evaluated and coordinated with the Federal Emergency Management Agency (FEMA). Federal Executive Order 11988 (Floodplain Management) states, "If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains." It is recommended that floodplains be identified and functions preserved to the greatest extent possible.

*Impaired Waters, CWA § 401 Certification, TMDLs:* It is recommended that any potential water resources impact analysis identify designated waterbody use, compliance of the waterbody with applicable water quality standards, and any CWA § 401 Certification issues. The SEIS should identify if any affected water resources are listed on the CWA § 303(d) impaired waters list. If listed, then any potential impacts on the affected water resource's Total Maximum Daily Load (TMDL) status should be considered and any mitigation measures to minimize further degradation of impaired waters. The following link may be helpful: 303(d) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>

### **Physiography**

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

### **Terrestrial Resources**

The SEIS should provide a complete description of the terrestrial habitat resources in the study area. It is recommended that a complete species lists for mammals, birds, amphibians, reptiles, and plants present in the study area be provided. The composition and characteristics of each community type should be summarized, and the functions and total acreage indicated. Special trees should be identified and described. The SEIS should specifically address how the project will minimize tree cutting and other vegetation removal to reduce soil disturbance and erosion, particularly near waterways.

When tree removal is necessary, it is recommended that trees be replaced to prevent a net tree loss. If applicable, EPA recommends a Forest Management plan be developed and implemented for the site.

### **Threatened and Endangered Species**

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

### **Hazardous Waste Management**

Please identify and evaluate hazardous sites nearby the proposed sites and alternatives. This would include sites being investigated under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) or sites regulated under the Resource Conservation and Recovery Act (RCRA). Any impact of these sites on the alternatives or construction methods should be considered (and/or impact of new construction on any ongoing cleanup or recovery activities).

RCRA set standards for hazardous waste treatment, storage, and disposal facilities. The management of hazardous waste at a proposed facility should be conducted in compliance with RCRA. EPA suggests the SEIS state if a Hazardous Waste Management Plan and a Hazardous Waste Minimization Plan are in place. Please identify known hazardous materials, including asbestos-containing materials (AM), lead-based paint (LBP), and oil and other hazardous materials (OHMs), located within the study area. The status of the materials should be discussed as well as remedial methods described (if applicable) in addition to providing a detailed plan for proper disposal.

It is suggested that other contamination at St. Elizabeths such as landfill/fly ash contamination, volatile organic compounds, petroleum hydrocarbon related constituents, polycyclic aromatic hydrocarbons, dioxin and furan congeners, and elevated levels of various metals such as lead and barium be included in the SEIS and associated ongoing and future remedial actions described.

Furthermore, EPA recommends the history of Underground Storage Tanks (USTs) on site be described in the SEIS. Specifically, how many USTs have been removed, the number of possible USTs that may remain, whether there is a plan to identify the locations of remaining tanks, if tanks will be tested for integrity, and if there is a plan to investigate soil and groundwater contamination, if USTs are determined to be present.

### **COMMUNITY IMPACTS**

*Cultural Resources:* The National Historic Preservation Act (NHPA) of 1966, as amended through 2006, directs federal agencies to integrate historic preservation into all activities which either directly or indirectly involve land use decisions. This is to ensure federal leadership in the preservation

of prehistoric and historic resources of the United States. Before approving or carrying out a federal, federally assisted, or federally licensed undertaking, Section 106 of the NHPA requires federal agencies to take into consideration the impact that the action may have on historic properties which are included on, or are eligible for inclusion on, the National Register of Historic Places. As the scoping notice identifies, GSA has initiated the Section 106 process to evaluate the effects of the proposed redevelopment of St. Elizabeths on the historic structures and landscape features that are Contributing Resources to the National Historic Landmark District as well as on potential archaeological resources. Coordination with the District of Columbia Historic Preservation Office, the Advisory Council on Historic Preservation, and other interested parties to seek ways to avoid, mitigate, and resolve potential adverse effects to historic resources is required by Section 106 and its implementing regulations. Please include within the SEIS detailed descriptions of the affected sites and potential impacts including correspondence with agencies and a Memorandum of Agreement, if applicable.

The Archaeological Resources Protection Act of 1979 (ARPA) was enacted to provide a comprehensive framework for protecting and regulating the use of archaeological resources on public and Native American lands. It mandated that all excavation and removal of archaeological resources on public land be done pursuant to a permit issued by the federal manager of the land involved. Please include GSA's consideration of archaeological resources in the NEPA analysis and adherence to the ARPA and its amendments.

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

*Socioeconomics:* Please discuss the socioeconomic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. It is recommended that the SEIS address the decrease or increase of people/employees/jobs in relation to its effect on tax base, local housing, job markets, schools, utilities, businesses, etc.

*Traffic and Transportation:* The SEIS should address traffic and transportation as it relates to the Proposed Action. It may be necessary to provide an evaluation of existing roads specifying existing levels of service at major intersections near the project area as well as accident data. For this project specifically, EPA suggests an evaluation of the impacts associated with an increased number of employees on site be provided. Associated impacts can be of varying nature, from roadway impacts, safety concerns to air quality impacts. Please note that the National Capital Planning Commission's policy is one parking space for every four employees within the Historic D.C. boundary. Additionally, The SEIS should discuss existing and proposed public transportation to the area under consideration and provide estimates of expected usage. It is recommended that traffic projections then be made to show expected conditions for a completed project. EPA suggests DHS coordinate with the appropriate transportation agencies related to these changes.

***Environmental Justice:*** Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs each federal agency to incorporate environmental justice into its mission and activities by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations....” The Executive Order also explicitly called for the application of equal consideration for Native American programs.

The SEIS should identify Environmental Justice (EJ) communities in the study area and discuss potential impacts that the Proposed Action may have on these communities. Maps displaying the defined study area are helpful, as well as maps and data of Census tracts and/or block groups to identify areas with populations of concern. Areas within the proposed action having high minority and low-income populations should be readily identifiable in the data provided, and targeted for meaningful public involvement and outreach. Additionally, EPA recommends the SEIS include the methodology used to conduct EJ assessment and the potential direct, indirect and cumulative impacts (i.e., air, noise, water quality, aesthetics, social, economic, health, and subsistence activities) to EJ populations. To assist in this effort, EPA has developed a new EJ mapping and screening tool called EJSCREEN. It is based on nationally consistent data and an approach that combines environmental and demographic indicators in maps and reports. It can be accessed at: <https://www.epa.gov/ejscreen>. Additionally, please consider referring to “Promising Practices for EJ Methodologies in NEPA Reviews”: <https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews>.

Based on previous reviews, it appears that the population in the vicinity of the St. Elizabeths West Campus may be majority minority and low-income. EPA recommends measures be taken to assure that this community is not disproportionately impacted by the proposed action to be taken. It is suggested that outreach efforts be extended to local churches and civic groups in an effort to assure wider participation of the citizens in the community. Notices to include local ethnic news outlets, which tend to be more widely read by local residents, could be extended.

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

### **Natural and Human Environment, Secondary and Cumulative Impacts**

The Council on Environmental Quality (CEQ) in 40 CFR 1508.8 defines secondary effects as “caused by an action and are later in time or farther removed in distance but are still reasonably foreseeable”. Examples of these could be the environmental effects of interconnected projects, such as additional infrastructure that may be needed to support the project.

Cumulative impacts can result from individually minor, but collectively significant actions taking place over a period of time. The CEQ in 40 CFR 1508.7 defines cumulative impacts as “impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or



person undertakes such other actions.” A cumulative impacts assessment is an important part of the SEIS.

### **Energy Efficiency and Resiliency**

EPA recommends the SEIS alternatives analysis, as appropriate, consider practicable designs to the proposal to make it more resilient to anticipated future weather scenarios. EPA further recommends that the SEIS consider implementation of reasonable mitigation measures that would reduce or eliminate project-related emissions.

*Leadership in Energy and Environmental Design:* The LEED (Leadership in Energy and Environmental Design) Green Building Rating System is a voluntary, consensus-based national standard for developing high-performance, sustainable buildings. Members of the U.S. Green Building Council representing all segments of the building industry developed LEED and continue to contribute to its evolution. LEED standards are currently available for:

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

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

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

### **Distribution List**

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



# United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

IN REPLY REFER TO:

1.A.1. (NCR-LPD)

December 18, 2018

Mr. Paul Gyamfi  
Office of Planning and Design Quality  
Public Building Service  
National Capital Region  
U.S. General Services Administration  
301 7<sup>th</sup> Street, S.W., Room 4004  
Washington, D.C. 20407

Dear Mr. Gyamfi:

The National Park Service (NPS) understands that the U.S. General Services Administration (GSA) has released a Notice of Intent (NOI) to prepare a Supplemental Environmental Impact Statement (SEIS) for amendments being made to the 2012 Master Plan for the U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths in Washington, D.C. This NOI also initiated a 30-day scoping period that seeks public and agency input on the proposal.

The NPS has reviewed the scoping materials and has been engaged in the ongoing Section 106 consultation for this project. It appears that, as presented, the actions proposed will not likely have direct impacts any properties under the jurisdiction of the NPS. However, we request that the SEIS provide further analysis of additional water, soil, or access issues that may arise as a result of the intensification of construction on the "Pavilion Site Development" site. Please provide details on how the project may impact adjacent lands including Shepherd Parkway, a NPS unit managed by National Capital Parks-East.

The project will directly impact the National Historic Landmark (NHL) St. Elizabeths Hospital Historic District, which is a historic property of particular interest to the NPS. Because of its role under the National Historic Preservation Act and because of the NPS's direct interest in the protection and preservation of NHLs throughout the nation, the NHL program representative for our region has been involved in the ongoing consultation under Section 106 of the National Historic Preservation Act. Below are our a few of our primary concerns regarding the effects of the proposed Master Plan Amendment #2 on the NHL district.

- The proposed concepts would result in the addition of approximately 250,000 GSF of new construction on the plateau or pavilion site. The result will be the removal of a number of historic buildings that were designated for preservation and reuse in the previous master plan as well as the loss of historic character-defining features of the landscape.

- The new construction will introduce large, out-of-scale buildings into a historic campus, thus eroding its significant integrity.
- During Section 106 consultations, it appeared that no rehabilitation will be funded until the new construction is complete. This is contrary to one of the primary tenants of the Programmatic Agreement and leaves the vacant historic structures vulnerable to demolition by neglect.
- As part of this study, GSA and DHS should identify workable uses for these buildings and tie their rehabilitation to the new construction.

Finally, we would like clarification on the illustrations and information included in the public scoping meeting poster materials, as described below.

- First, the need stated on the Purpose & Need slide states that the purpose is to reduce costs and shorten the duration of construction. Has it been demonstrated that there are no other feasible ways to accomplish these two goals other than to expand the new construction on the Pavilion site?
- The SEIS should include a reasonable set of alternatives, and all alternatives should include rehabilitation/reuse of historic buildings on the campus.
- The Illustrative Site Plan on page 9 indicates that the rehabilitation of a number of historic buildings is actively underway, when the consulting parties have been told that no more historic buildings will be reused until the new construction being contemplated under this Master Plan amendment is complete. This could endanger the unused historic structures and directly contradicts the intent and procedures laid out in the 2008 Programmatic Agreement.
- The scoping materials do not address new elements that have been presented in the consulting party meetings, most significantly a new Office of Intelligence & Analysis (I&A) building; a new 175,000 GSF building located on the existing ballfield site above the historic cemetery.

It is imperative that the SEIS carefully examine how the alternatives carried forward directly or indirectly affect the NHL and accurately assess any effects to adjacent lands including Shepherd Parkway. In addition, we look forward to seeing how this proposal affects The L'Enfant Plan of Washington D.C. and the Capital Hill Historic District.

We appreciate the opportunity to provide these comments. For continued coordination in this NEPA planning effort, as well as Section 106 of the National Historic Preservation Act planning requirements, please contact Joel Gorder, Regional Environmental Coordinator at 1100 Ohio Drive, S.W., Washington, D.C., 20242. Mr. Gorder can be reached by phone at (202) 619-7405 or email [joel\\_gorder@nps.gov](mailto:joel_gorder@nps.gov).

Sincerely,



Peter May  
Associate Regional Director  
Lands and Planning

**From:** [Glynn, Joan](#)  
**To:** [Estes, Liz](#)  
**Subject:** FW: Notification of work at St. Elizabeths  
**Date:** Friday, January 4, 2019 10:27:48 AM

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**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Monday, November 19, 2018 1:40 PM  
**To:** Glynn, Joan <joan.glynn@stantec.com>; Davis, Jessica <Jessica.Davis@stantec.com>  
**Subject:** Fwd: Notification of work at St. Elizabeths

St. Es SEIS Response

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
301 7th Street, SW  
Room 4004  
Washington, DC 20407  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

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

**From:** **Smith, Kathryn** <[kathryn\\_smith@nps.gov](mailto:kathryn_smith@nps.gov)>  
**Date:** Mon, Nov 19, 2018 at 1:31 PM  
**Subject:** Re: Notification of work at St. Elizabeths  
**To:** <[nps\\_nhl\\_nereview@nps.gov](mailto:nps_nhl_nereview@nps.gov)>  
**Cc:** <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>

Thank you for forwarding this. I am aware and have been involved in the project, though I never received this letter. Please put my contact information on your distribution list.

Best,  
Kathryn

**Kathryn G. Smith**  
National Historic Landmarks & National Register Coordinator  
National Capital Region, National Park Service

1100 Ohio Drive, SW  
Washington, DC 20242  
202.619.7180  
202.401.0017 fax

[kathryn\\_smith@nps.gov](mailto:kathryn_smith@nps.gov)

**NCR Website** <https://www.nps.gov/RESSNCR>

**NHL Website** <http://www.nps.gov/nhl>

**Facebook** [National Historic Landmark Program - NPS](#)

**Instagram** [NationalHistoricLandmarkNPS](#) #NationalHistoricLandmark #FindYourPark

On Mon, Nov 19, 2018 at 1:02 PM NHL NEReview, NPS <[nps\\_nhl\\_nereview@nps.gov](mailto:nps_nhl_nereview@nps.gov)> wrote:

We are in receipt of the November 8, 2018, letter to the Northeast Region of the National Park Service regarding proposed work at St. Elizabeths Hospital National Historic Landmark (NHL). A scan of the letter is attached.

The responsibilities for the NHL program for the Washington, DC area has been transferred to the National Capital Region. The point of contact is Kathryn Smith (who is copied on this email). Please direct all future correspondence regarding St. Elizabeths to the National Capital Region.

-----  
Preservation Assistance  
National Park Service - Northeast Regional Office  
1234 Market Street, 20th floor  
Philadelphia, PA 19107

**From:** Paul Gyamfi - WPDBA  
**To:** [Glynn, Joan](#); [Estes, Liz](#); [Shelly Jones - WPDBA](#); [Marc Poling - WPD](#)  
**Subject:** Fwd: St. Elizabeths EIS Scoping Comments - West Campus Amendment # 2  
**Date:** Tuesday, December 18, 2018 10:04:01 AM  
**Attachments:** [image001.png](#)

---

ST. Es comments from DDOT

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
301 7th Street, SW  
Room 4004  
Washington, DC 20407  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

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

**From:** **Zimmerman, Aaron (DDOT)** <[aaron.zimmerman@dc.gov](mailto:aaron.zimmerman@dc.gov)>  
**Date:** Mon, Dec 17, 2018 at 5:28 PM  
**Subject:** St. Elizabeths EIS Scoping Comments - West Campus Amendment # 2  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov) <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>  
**Cc:** Plano, Stephen (DDOT) <[stephen.plano@dc.gov](mailto:stephen.plano@dc.gov)>, Chamberlin, Anna (DDOT) <[anna.chamberlin@dc.gov](mailto:anna.chamberlin@dc.gov)>, Stout, Amanda (DDOT) <[amanda.stout@dc.gov](mailto:amanda.stout@dc.gov)>, Kilim, Giri/WDC <[Giri.Kilim@jacobs.com](mailto:Giri.Kilim@jacobs.com)>, Marc Poling - WPDBA <[marc.poling@gsa.gov](mailto:marc.poling@gsa.gov)>, Snowden, Renan (DDOT) <[Renan.Snowden@dc.gov](mailto:Renan.Snowden@dc.gov)>

Mr. Gyamfi,

Thank you for giving DDOT the opportunity to comment on the St Elizabeths West Campus Amendment #2 action following the November 29, 2018 Open House. It is DDOT's understanding that the General Services Administration (GSA) proposes to consolidate all remaining Federal offices (i.e., FEMA) from the East Campus over to the West Campus. This will result in the construction of a 175,000 SF building on the "I & A Site", construction of a 1.2 million SF building on the "Plateau Site," and demolition of five (5) buildings previously planned to be rehabilitated. DDOT also understands that GSA is proposing to increase the number of employees associated with the West Campus from a master planned maximum of 14,000 to a new maximum of 17,000 while simultaneously reducing the number of master planned seats from 14,000 down to 12,800.

We offer the following comments on the proposed action:

- Please scope a Comprehensive Transportation Review (CTR) study with DDOT's Neighborhood Planning Branch. Aaron Zimmerman [aaron.zimmerman@dc.gov](mailto:aaron.zimmerman@dc.gov) 202-671-2356 will be the primary point of contact.
- As part of the CTR scope, a major component should include an update to the previous Transportation Management Plan (TMP). DDOT recommends making this very robust to support GSA's proposal to substantially increase the number of employees (+3,000) while reducing the number of seats (-1,200). This plan will help mitigate any identified impacts to the transportation network.
- DDOT is not supportive of widening Martin Luther King Jr. Avenue SE from four (4) to five (5) lanes. The transportation analysis should assume a four-lane section (without turn lanes) under future conditions and explore all other mitigation options, such as a robust Transportation Demand Management (TDM) component of the TMP, providing shuttles to Metro, requiring employees to telework, and minimizing the amount of on-site vehicle parking, before considering the addition of travel lanes or turn lanes.
- Coordinate with St Elizabeths East Campus regarding their site access points, the possibility of new traffic signals along the corridor, and how those relate to the West Campus's site access points in order to minimize the need for driveways along Martin Luther King Jr. Avenue SE.
- Regarding vehicle parking, it is DDOT's understanding that 1 space will be provided for every 4 seats or employees. Based on initial meetings and discussions with GSA, DHS, and their consultants, it isn't yet clear to DDOT whether the amount of vehicle parking will be increased or decreased or whether there will be new parking garages on the West Campus. As you move through CTR scoping, please flesh out the details on vehicle parking. DDOT strongly encourages GSA to consider providing an even lower parking ratio than currently proposed. Other Federal projects around the District that DDOT has been involved with have ranged from 1 per 8 to 1 per 20 ratios. Reducing the amount of vehicle parking will reduce the potential impacts this action could have on the transportation network.
- Please provide clarity on the square footages of buildings planned to be demolished (#60, 66, 67, 68, 69 and any others). This will help DDOT and GSA's traffic consultant in determining how best to model the changes to land uses and density.
- It was stated at the Open House that GSA plans to improve space efficiency by shrinking employee cubicles from 80 SF to 48 SF. It is not clear how GSA projects a decrease in the number of seats on the West Campus (from 14,000 to 12,800) while simultaneously fitting more seats into the same amount of existing space and then constructing an additional net of +/- 1 million SF of office. Please provide clarity on this.
- Provide clarity on the commitments that GSA has made regarding new transportation infrastructure and the timing of that infrastructure.

We look forward to working together with your team over the coming year. Please reach out to us if you have any questions.

Thanks,

Aaron

**Aaron Zimmerman, PTP**  
*Senior Transportation Planner*

Planning and Sustainability Division (PSD)  
Neighborhood Planning Branch

District Department of Transportation  
55 M Street SE, Suite 400  
Washington, DC 20003

o. 202.671.2356

e. [aaron.zimmerman@dc.gov](mailto:aaron.zimmerman@dc.gov)

w. [ddot.dc.gov](http://ddot.dc.gov)



***Did you know that DC has the second lowest uninsured rate in the nation? Together, let's make DC #1. Get covered and stay covered at [DCHealthLink.com](http://DCHealthLink.com) or by calling (855) 532-5465. #GetCoveredDC, #StayCoveredDC***



December 18, 2018

Paul Gyamfi  
Senior NEPA Compliance Specialist  
U.S. General Services Administration  
National Capital Region  
301 7<sup>th</sup> Street SW, Room 4004  
Washington, DC 20407

Re: Master Plan #2 for the Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths

Dear Paul Gyamfi,

Casey Trees is a Washington, D.C.-based nonprofit, with a mission “to restore, enhance, and protect the tree canopy of the nation’s capital.” To fulfill this mission, we plant trees; monitor the city’s tree canopy; and work with government officials, developers, and residents to prioritize the District’s trees. We are dedicated to helping D.C. reach its [40 percent tree canopy goal by 2032](#). As a city, we will achieve this goal when development projects and city plans ensure no net loss in tree canopy. Thank you for the opportunity to provide comments on the revised master plan for the Department of Homeland Security (DHS) headquarters consolidation at St. Elizabeths west campus.

At the public scoping meeting on November 29, 2018, The U.S. General Services Administration (GSA) presented two alternative plans for the plateau site development. **Tree canopy covers nearly 6 acres or 35% of the plateau site.** Therefore, Casey Trees’ recommendations focus on the two alternative redevelopment plans for the plateau – the “Dispersed” plan, and the “Compact” plan.

After reviewing each alternative in detail, **we urge the U.S. General Services Administration (GSA) to select the Compact plan and to adopt the recommendations below:**

- 1. Select the Compact plan to preserve as many existing trees as possible.** If the Dispersed plan is selected, 71% of the existing tree canopy on the plateau site would be lost, while the Compact plan would require removal of 62% of this existing tree canopy (Figure 1).
- 2. Plant new trees to replace the 3.6 acres of tree canopy lost to development.** Although the Compact plan will allow the development team to preserve more trees than the Dispersed plan, the Compact plan will still necessitate the removal of 3.6 acres – over 14,500 m<sup>2</sup> – of existing tree canopy. We strongly urge the development team to plant new trees to replace this lost canopy. The 4.6 acres of green space highlighted in Figure 2 provides ample space to plant these replacement trees. This action also complies with [policy FE.G.2 of the Federal Comprehensive Plan](#), which states “when tree removal is necessary, trees should be replaced to prevent a net



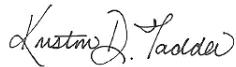
tree loss to the project area.” Specifically, smaller trees with a 10-inch diameter or less must be replaced at a minimum of a one-to-one basis. Larger trees with a diameter greater than 10 inches must be replaced at a rate derived from a formula developed by the International Society of Arboriculture.”

- 3. Include a tree planting plan for the plateau site in the revised master plan.** Specify where replacement trees will be planted and what tree species will be selected. Strive to plant large canopy trees and increase tree diversity where possible.

With the consolidation of DHS headquarters, GSA has a rare opportunity to re-envision St. Elizabeths west campus. Taking the actions outlined above will allow GSA to maintain a 35% tree canopy while creating a lush, green attraction that will benefit visitors and commuters; help the city reach its environmental goals; and support a more connected citywide ecosystem.

Casey Trees would be happy to work with you on a tree planting plan or to provide tree-related analyses for the revised master plan. If you have any questions about these recommendations, please feel free to contact me at [ktaddei@caseytrees.org](mailto:ktaddei@caseytrees.org).

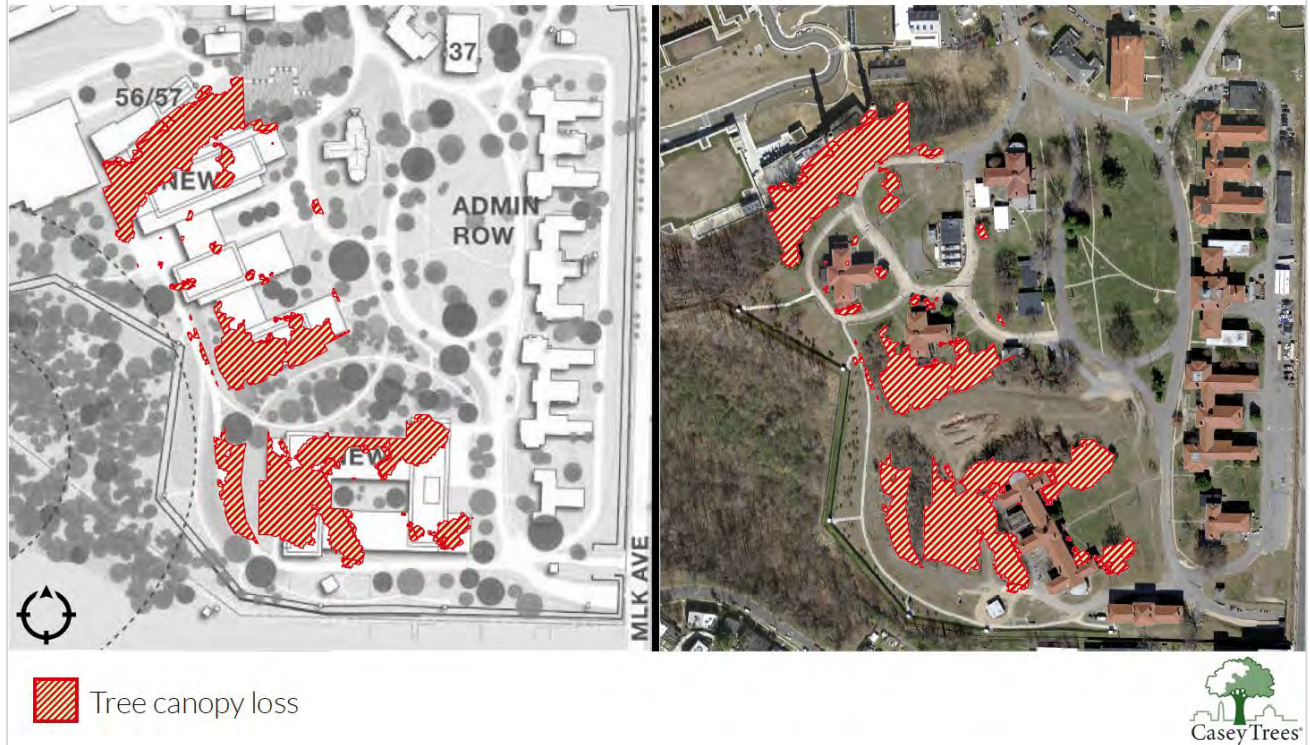
Sincerely,

A handwritten signature in cursive script that reads "Kristin D. Taddei".

Kristin Taddei  
Planning Advocate

# Tree Canopy Loss - Dispersed Alternative

Plateau Site, St. Elizabeths West Campus



**Figure 1.** If the Dispersed plan is selected, 71% of the existing tree canopy on the plateau site would be removed.

# Tree Canopy Loss - Compact Alternative

Plateau Site, St. Elizabeths West Campus




**Figure 2.** If the Compact plan is selected, 62% of the existing tree canopy on the plateau site would be removed.



# Targeted Planting Areas

Plateau Site, St. Elizabeths West Campus



 Targeted planting areas



**Figure 3.** The 4.6 acres of green space shown in green provides ample space to plant replacement trees.

# Comment Card

Please submit your comments tonight or  
fold in half and mail by December 19, 2018.

Comments may be submitted on line at: <http://www.stelizabethsdevelopment.com/nepa.html>

or emailed to: [Paul.gyamfi@gsa.gov](mailto:Paul.gyamfi@gsa.gov)

Subject: St. Elizabeths EIS Scoping Comments

Name: Mustafa Abdul-Salaam Organization: ANC 805 Commissioner

Email: yedumu@gmail.com

Address: 3825 South Capitol St

check to be added to project mailing list

Comment: Concern about the linkage between  
the West and East campus. How will the  
community benefit from the economic  
opportunities that the employees in  
the west campus can bring?

U.S. Department of Homeland Security Headquarters



at St. Elizabeths

**From:** [Glynn, Joan](#)  
**To:** [Estes, Liz](#)  
**Subject:** FW: Fw: public comment on federal register the goddam objective is to get these illegal imigrants oiut of the usa - not to let them live here on our tax dollars 0 what the hehll is going on  
**Date:** Friday, January 4, 2019 10:27:11 AM

---

**From:** Paul Gyamfi - WPDBA <paul.gyamfi@gsa.gov>  
**Sent:** Monday, November 19, 2018 12:46 PM  
**To:** Glynn, Joan <joan.glynn@stantec.com>  
**Subject:** Fwd: Fw: public comment on federal register the goddam objective is to get these illegal imigrants oiut of the usa - not to let them live here on our tax dollars 0 what the hehll is going on

St Es SEIS Comment

Paul Gyamfi  
Senior NEPA Compliance Specialist  
General Services Administration  
National Capital Region  
Public Buildings Services  
Office of Planning and Design Quality  
301 7th Street, SW  
Room 4004  
Washington, DC 20407  
Desk Tel: (202) 690 9252  
Cell: (202) 440 3405

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

**From:** **Jean Public** <[jeanpublic1@yahoo.com](mailto:jeanpublic1@yahoo.com)>  
**Date:** Mon, Nov 19, 2018 at 12:42 PM  
**Subject:** Fw: public comment on federal register the goddam objective is to get these illegal imigrants oiut of the usa - not to let them live here on our tax dollars 0 what the hehll is going on  
**To:** [paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov) <[paul.gyamfi@gsa.gov](mailto:paul.gyamfi@gsa.gov)>, [info@fairus.org](mailto:info@fairus.org) <[info@fairus.org](mailto:info@fairus.org)>, [info@taxpayer.net](mailto:info@taxpayer.net) <[info@taxpayer.net](mailto:info@taxpayer.net)>, [media@cagw.org](mailto:media@cagw.org) <[media@cagw.org](mailto:media@cagw.org)>, [info@njtaxes.org](mailto:info@njtaxes.org) <[info@njtaxes.org](mailto:info@njtaxes.org)>

the americna public is sick of being ripped off to make life easier for foreign illegal imigrants. the fact is we have plenty of americans suffering with no work, no jobs, no income who need help. they dont need help to stay at home,. they need jobs. illegal immigrnts are comgin here and taking the low wage jobs andamericans hwo need work need to take them to get money. it should not be hjanded to them for staying at home and not working.

secondly i see no reason to keep more people in washington dc. the problem is at our southern and noorther border both of which are like a seive. the wall is bein glmcted every single day. nobody has put

barbed wire on teh wall. why not. the wall needs barbed wires on it and it needs aremed guards to make sure none of these leaches from foreign lands get into our country to add to our countrys woes. our country is being turned into third world heaven for these leaches.

we need more staff at trhe southern border, not in washington dc. put more staffon the border. and they are there to deny all those caravan leaches who wawnt to storm our country. thy already are climinbing our walls. why are we allowing them to be on our walls? the folks at immigration and gsa share brainless capabilities in trying to put more in washington dc. we need more on the southern border who can say no and mean it. go back to honduas or wherever th ehell you came from. we dont want you here.this comment is for the public record. please receipt. jean publicee [jeanpublic1@yahoo.com](mailto:jeanpublic1@yahoo.com)

[Federal Register Volume 83, Number 223 (Monday, November 19, 2018)]  
[Notices]  
[Page 58251]  
From the Federal Register Online via the Government Publishing Office  
[[www.gpo.gov](http://www.gpo.gov)]  
[FR Doc No: 2018-25207]

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GENERAL SERVICES ADMINISTRATION

[Notice-PBS-2018-11; Docket No. 2018-0002; Sequence No. 27]

Notice of Intent To Prepare a Supplemental Environmental Impact Statement for the Proposed U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan Amendment #2

AGENCY: National Capital Region, Public Buildings Service U.S. General Services Administration (GSA).

ACTION: Notice of intent to prepare a Supplemental Environmental Impact Statement.

-----

SUMMARY: GSA plans to prepare a Supplemental Environmental Impact Statement (SEIS) for the proposed Master Plan Amendment to support the continued consolidation of the U.S. Department of Homeland Security (DHS) Headquarters at the St. Elizabeths West Campus, pursuant to the requirements of the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, and with Section 106 of the National Historic Preservation Act (NHPA) in accordance with 36 CFR part 800.8

DATES: Applicable: Monday, November 5, 2018.  
The public scoping meeting date is: Thursday, November 29, 2018, from 6:30 p.m. to 8:30 p.m., Eastern Daylight Time (EDT).

ADDRESSES: R.I.S.E Demonstration Center, 1730 Martin Luther King Jr. Avenue SE, Washington, DC, 20032.

FOR FURTHER INFORMATION CONTACT: Paul Gyamfi, GSA, National Capital Region, Office of Planning and Design Quality, at 202-690-9252. Please contact Mr. Gyamfi if special assistance is needed to attend and participate in the scoping meeting.

SUPPLEMENTARY INFORMATION: GSA intends to prepare a SEIS to analyze the potential impacts resulting from the proposed Master Plan Amendment #2 to support the DHS Headquarters consolidation at the St. Elizabeths West Campus.

Background

In 2008 and in 2012, GSA completed Environmental Impact Statements that analyzed the impacts from the development of 4.5 million square



feet of secure office space, plus parking, in the District of Columbia to support the consolidated headquarters of the DHS on the St. Elizabeths East and West Campuses. GSA is preparing a SEIS to assess the impacts of development of the consolidated headquarters on the West Campus of St. Elizabeths. The proposed action is needed to improve efficiency, reflect the current condition of the historic buildings, reduce costs, and accelerate completion of the DHS consolidation. Previous St. Elizabeths Master Plans and Environmental Impact Statements are available for review at <http://stelizabethsdevelopment.com/nepa.html>.

#### Alternatives Under Consideration

GSA will analyze a range of alternatives (including the no action alternative) for the proposed Master Plan Amendment #2 of the DHS Headquarters at St. Elizabeths. This Master Plan Amendment will focus on development options to efficiently house DHS and its operating components on the St Elizabeths West Campus.

#### Scoping Process

A scoping process will be conducted to aid in determining the alternatives to be considered and the scope of issues to be addressed, for identifying the significant issues related to the proposed Master Plan Amendment, in accordance with NEPA and NHPA.

#### Public Scoping Meeting

A public scoping meeting will be held on Thursday, November 29, 2018, from 6:30 p.m. to 8:30 p.m., EDT at the R.I.S.E Demonstration Center, 1730 Martin Luther King Jr. Avenue SE, Washington, DC 20032. The meeting will be an informal open house where meeting participants may receive information, and give comments. GSA is publishing notices in the Washington Post, Afro-American, and the Washington Informer newspapers announcing the meeting.

#### Written Comments

Interested parties are encouraged to provide written comments on the SEIS and Section 106 processes. The scoping period begins on November 19, 2018 and ends on December 19, 2018. Comments received during the scoping period will be considered in the analyses to be conducted for the SEIS. Written comments regarding the SEIS must be postmarked no later than December 19, 2018, and sent to the following address: Mr. Paul Gyamfi, Office of Planning and Design Quality, Public Buildings Service, National Capital Region, U.S. General Services Administration, 301 7th Street SW, Suite 4004, Washington, DC, 20407; or by email: [Paul.Gyamfi@gsa.gov](mailto:Paul.Gyamfi@gsa.gov) using the subject line: St. Elizabeths Master Plan Amendment #2. All emails must be received by 11:59 p.m. December 19, 2018.

Dated: November 7, 2018.  
Kristi Tunstall Williams,  
Deputy Director, Office of Planning and Design Quality, Public  
Buildings Service, National Capital Region, U.S. General Services  
Administration.  
[FR Doc. 2018-25207 Filed 11-16-18; 8:45 am]  
BILLING CODE 6820-YI-P

APPENDIX B  
Air Quality Report

# U.S. Department of Homeland Security Headquarters at St. Elizabeths West Campus Master Plan Amendment 2 Draft Supplemental Environmental Impact Statement

## Air Quality Technical Report

Final Version

August 2020

**JACOBS**<sup>®</sup>

Prepared by  
Jacobs Engineering Group Inc.



Prepared for  
U.S. General Services Administration



# **U.S. Department of Homeland Security Headquarters at St. Elizabeths West Campus Master Plan Amendment 2 Supplemental Environmental Impact Statement**

Document Title: **Air Quality Technical Report**  
Revision: Final Version  
Date: August 2020  
Client Name: U.S. General Services Administration  
Project Manager: Paul Kohler  
Author: Hong Zhuang  
File Name: St.Elizabeths\_WestCampus\_MPA2\_SEIS\_AirQuality\_20190820.docx

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## 1 INTRODUCTION

This Air Quality Technical Report (AQTR) documents the air quality analysis of the proposed Master Plan Amendment 2 of the U.S. Department of Homeland Security (DHS) Headquarters Consolidation at St. Elizabeths Master Plan Amendment 2. The primary purpose of the action is to accommodate 4.1 million gross square feet (gsf) of secure office and shared-use space and 1.6 million gsf of associated parking at the St. Elizabeths West Campus (West Campus).

The AQTR is built upon previous analyses and documentation in the 2012 Final Environmental Impact Statement (2012 EIS) and Master Plan Amendment 1 prepared for the DHS Headquarters Consolidation at St. Elizabeths, with newly collected data on project construction, operation, traffic conditions, and updated transportation network and land use forecasts. This AQTR evaluates whether the changes proposed in Master Plan Amendment 2 would cause adverse air quality impacts. The analysis provides detailed technical information, analysis results, and recommended mitigation measures, if needed.



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## 2 PROJECT DESCRIPTIONS

### 2.1 Project History and Previous Master Plans

St. Elizabeths campuses are in Anacostia in southeast Washington, DC. Originally, they were the campuses for a self-contained mental health community – St. Elizabeths Hospital. The U.S. Department of Health and Human Services (HHS) and its predecessors owned and operated the hospital from its founding in 1855 until 1987, when the East Campus and hospital operations were transferred to the District of Columbia (District). St. Elizabeths continues to operate as an inpatient mental hospital on the southern portion of the East Campus. Portions of the West Campus were used for outpatient services until 2003, when it ceased operations (outpatient care continued on the East Campus). In January 2001, HHS determined that it no longer needed the West Campus and declared the property “excess to its needs.” The U.S. General Services Administration (GSA) took over the West Campus in December 2004 (Jacobs, 2019).

Since 2008, the 176-acre West Campus has been under redevelopment for use as headquarters for DHS and its component agencies. The remainder of the East Campus owned by the District is slated for redevelopment into mixed-use neighborhoods of retail, office, housing, open space, and cultural amenities. Both West and East campuses were designated a National Historic Landmark (NHL) in 1991.

#### 2.1.1 Master Plan

On January 8, 2009, the National Capital Planning Commission (NCPC) approved the Master Plan for the DHS Headquarters Consolidation (Master Plan); the U.S. Commission of Fine Arts (CFA) approved the Master Plan on November 20, 2008. The Master Plan provides the development framework for accommodating 4.5 million gsf of office space for the DHS headquarters on both the West and East campuses. The Master Plan outlines 3.8 million gsf of office space on the West Campus and 750,000 gsf of office space on a portion of the East Campus (identified as East Campus North Parcel). The development would be consistent with a DHS Interagency Security Committee (ISC) Level V campus to house mission-critical Federal agencies.

#### 2.1.2 Master Plan Amendment 1

In 2012, GSA amended the Master Plan to include detailed planning, an EIS, and an additional NHPA assessment for the East Campus North Parcel, including the widening of Martin Luther King Jr. Avenue SE to accommodate a left-turn lane, a streetcar lane, and improved pedestrian-friendly sidewalks, collectively known as Master Plan Amendment 1. Consistent with the Master Plan, the Master Plan Amendment 1 provided a framework for the future development considering historic and natural resources, site characteristics, circulation and access, and massing and density, while meeting the programmatic needs of the DHS Consolidation.

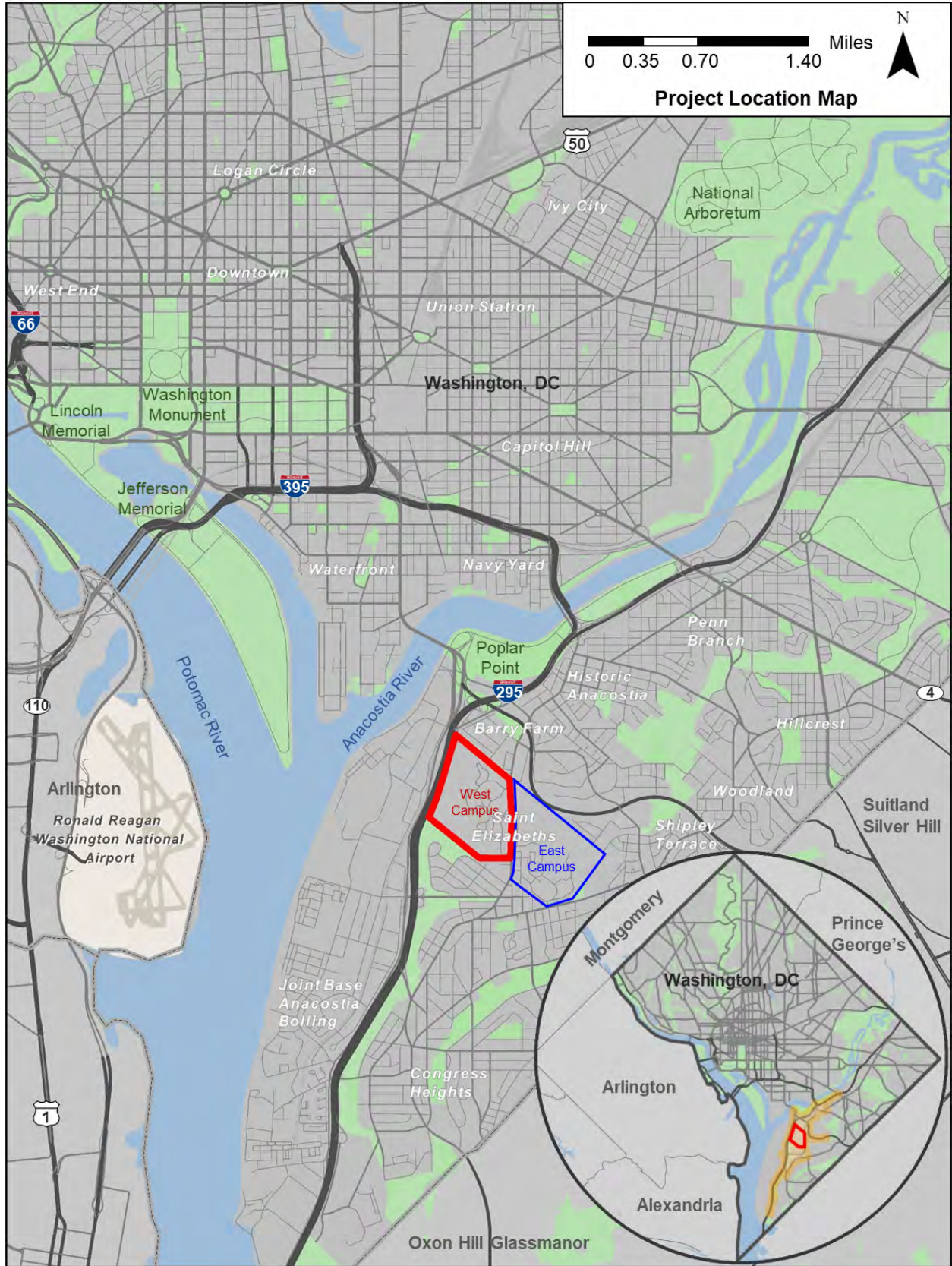
### 2.2 Master Plan Amendment 2

GSA is currently amending the Master Plan and the Master Plan Amendment 1 to more efficiently house DHS and its operating components on the West Campus. The proposed Master Plan Amendment 2 would accommodate a total of 4.1 million gsf of secure office and shared-use space, and 1.6 million gsf of associated parking at West Campus. To accomplish this goal, GSA has

developed alternatives to place up to 1.2 million gsf of secure office space on the plateau site and 175,000 gsf of secure office space on the Sweetgum Lane site.

## 2.2.1 Project Location

The West Campus is in the southeast quadrant of the District, directly south of Historic Anacostia (**Figure 2-1**). The West Campus, currently partially vacant, is a 176-acre former mental health facility that is bounded by the Barry Farm and Congress Heights residential communities to the north and south, respectively; Martin Luther King Jr. Avenue SE to the east; I-295 to the west; and Shepherd Parkway (National Park Service lands) to the southwest. Regional air quality impacts were evaluated for the District, and the localized air quality impacts were evaluated for the areas that encompass the West Campus and the surrounding major freeway segments, local arterials, and intersections, as illustrated on **Figure 2-2**.



**Figure 2-1: Project Location**

Source: Jacobs, 2019



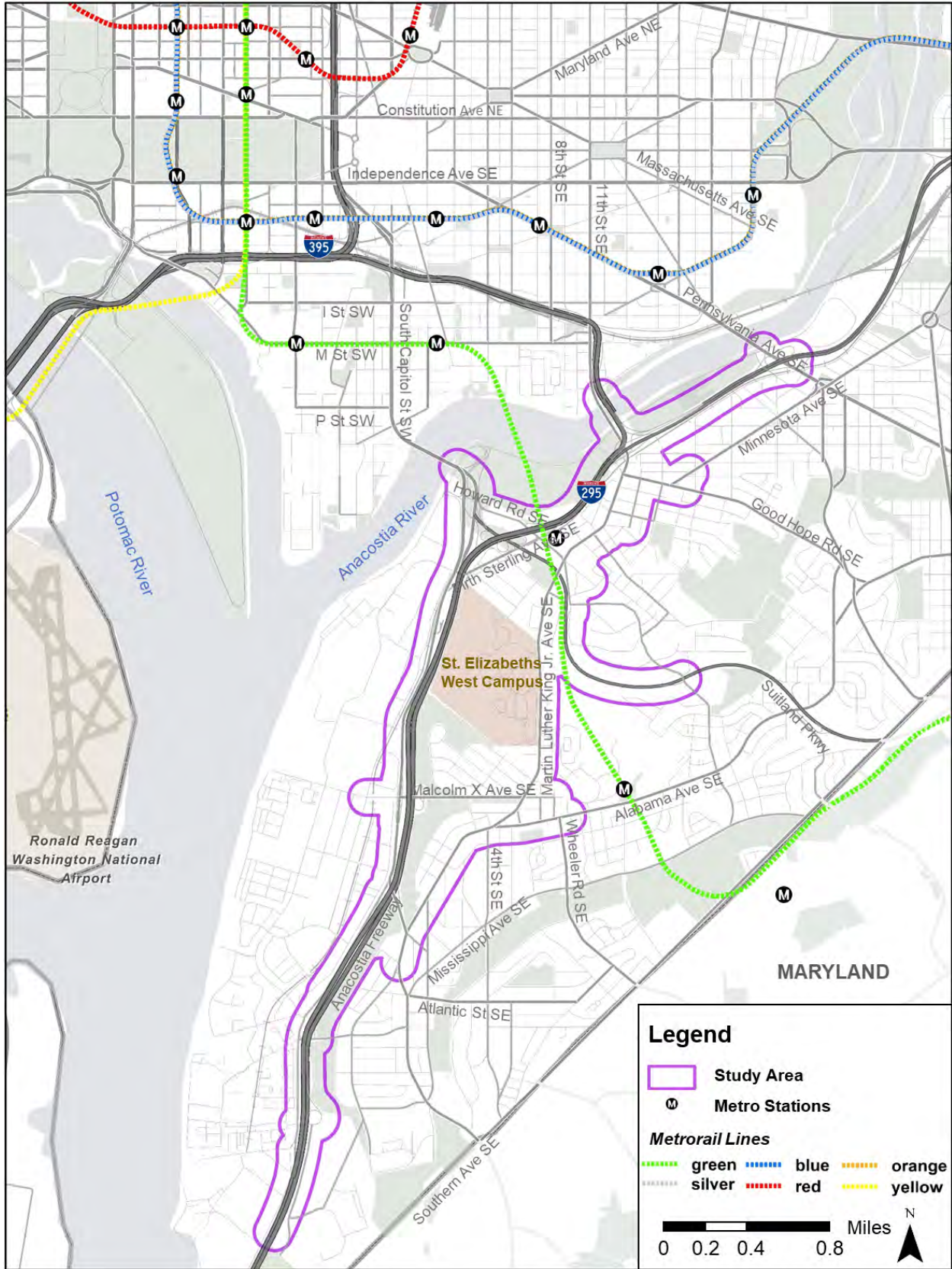


Figure 2-2: Air Quality Study Area for Local Impacts

Source: Jacobs, 2019

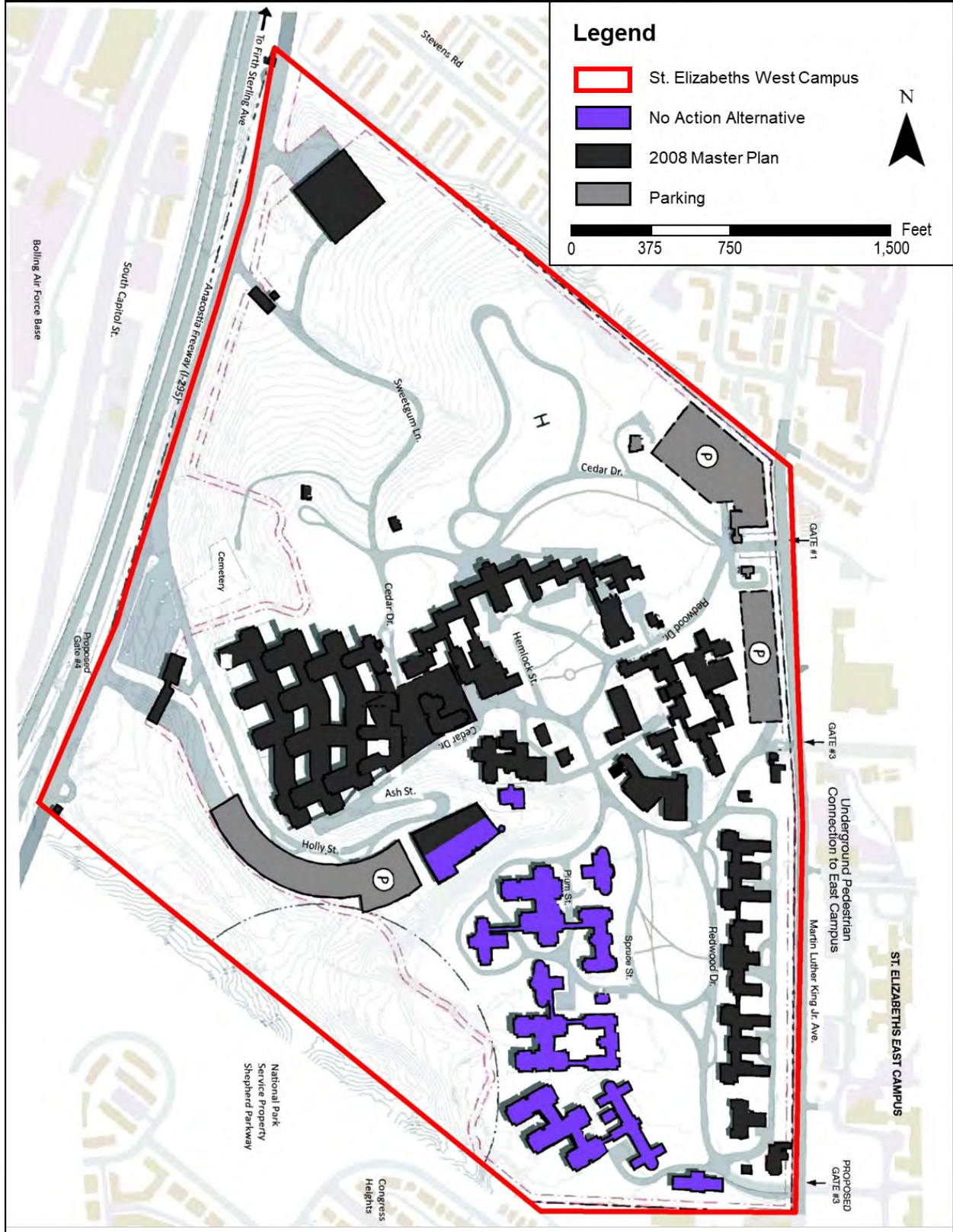
## 2.2.2 Alternatives

### 2.2.2.1 No Action Alternative

Under the No Action Alternative, GSA would develop the West Campus as described in the Master Plan as approved by NCPC on January 8, 2009. The development would provide 1,141,133 gsf of office and related space on the plateau site with no development on the Sweetgum Lane site and would result in a total of 3.8 million gsf of office and related space on the West Campus (**Figure 2-3**). Parking would be provided at a ratio of one parking space for every four employees (1:4). On the West Campus, 1.2 million gsf of parking would be constructed above and below grade. No buildings would be demolished within the plateau or Sweetgum Lane sites.

Master Plan Amendment 1 included development of office space and parking on the North Parcel of the East Campus. The East Campus is under the control of the District; therefore, the construction of DHS facilities on the East Campus is not feasible and is not included under the No Action Alternative.





Source: GSA, 2008

Figure 2-3: Master Plan Amendment 1 - No Action Alternative for Master Plan Amendment 2

**Table 2-1: No Action Alternative**

Activity	Above Grade gsf	Below Grade gsf	Total
Plateau Site Construction	1,064,133	77,000	1,141,133
Sweetgum Lane Site Construction	0	0	0
Structures to be Demolished	0	0	0
West Campus Parking Structures Construction	478,900	737,600	1,216,500
Activity	Above Grade Spaces	Below Grade Spaces	Total Spaces
West Campus Parking Spaces Addition (1:4 Parking Ratio)	2,090	1,369	3,459

Source: GSA, 2012b

### 2.2.2.2 Alternative A

Under Alternative A, 1.2 million gsf of office space would be organized into three separate office structures organized around two open courtyards (proposed Buildings A1, A2, and A3) as shown on **Figure 2-4** and in **Table 2-1**, resulting in a campus setting that correlates to the organization of the historic buildings on the West Campus. Building heights would likely be designed to reach between three and eight stories. The largest part of the structures would generally have an east-west orientation, which would be ideal for optimizing the use of daylight and energy efficiency. The building organization also relates well to the direction of stormwater flow from east to west. The central open courtyards would be tiered from east to west, in conjunction with site topography. Buildings could be linked below grade at these elevation drops to facilitate internal circulation, fit naturally on the site, and minimize the need to disturb existing topography and vegetation. Building A1 would be stepped down into the ravine near the Building 56/57 to stabilize the slope in that area. Building 56/57 would be integrated into the design of Building A1 to provide a connection between the historic and new construction. Buildings 52 and 64 would be retained, rehabilitated and adaptively reused. Buildings 60, 66, 67, 68, and 69, which total 65,295 gsf, would be demolished under Alternative A.

Under Alternative A, 175,000 gsf of office space (proposed Building C1) would be constructed on the Sweetgum Lane site, organized into primarily below-grade construction, with one two-story building constructed to mirror the northwest corner of the Munro Building. The building would include up to three below-grade levels, which would take advantage of the site slope from east to west, allowing the western edge of the building to receive daylight. A central courtyard would provide internal daylighting; the building could be linked below grade to the DHS Operations Centers.

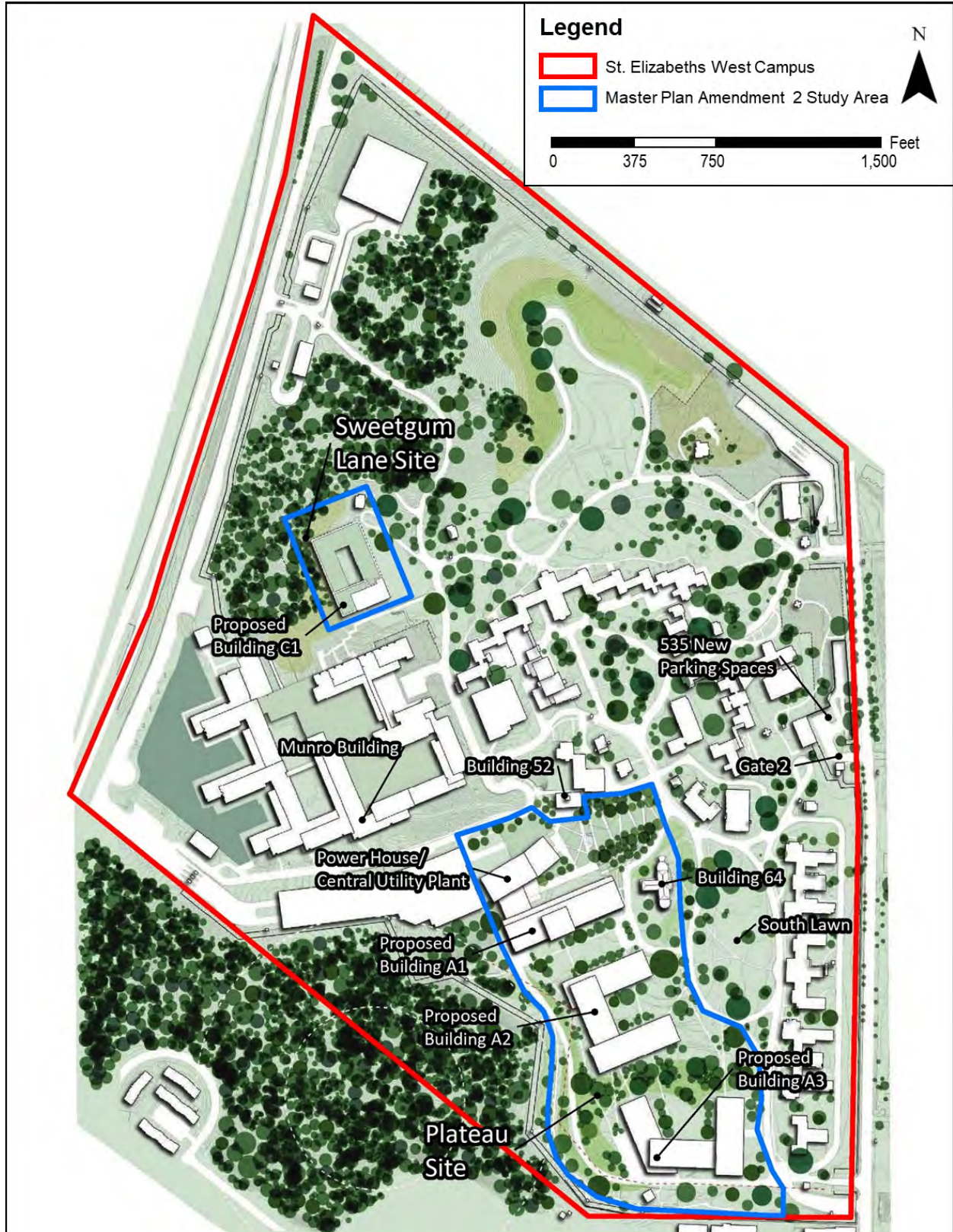
Under Alternative A, an additional 166 parking spaces would be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces would be added to the previously proposed underground parking garage on the west side of the campus.

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

- Sidewalk locations around and between buildings

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





Source: ZGF Olin, 2019

Figure 2-4: Master Plan Amendment 2 Alternative A

**Table 2-2: Alternative A Proposed Development**

Activity	Above Grade gsf	Below Grade gsf	Total gsf
Plateau Site—Building A1 Construction	350,000	0	350,000
Plateau Site—Building A2 Construction	425,000	0	425,000
Plateau Site—Building A3 Construction	425,000	0	425,000
Sweetgum Lane Site—Building C1 Construction	25,000	150,000	175,000
Structures to be Demolished	68,044	0	68,044
West Campus Parking Structures Construction	478,900	1,112,900	1,591,800
Activity	Above Grade Spaces	Below Grade Spaces	Total Spaces
West Campus Parking Spaces Addition (1:4 Parking Ratio)	2,090	1,535	3,625

### 2.2.2.3 Alternative B

Under Alternative B, 1.2 million gsf of office space would be organized into two separate office structures organized around two enclosed courtyards (proposed Buildings B1 and B2, ZGF Olin 2019) as shown in **Figure 2-5 and Table 2-3**. Building heights would likely be designed to reach between three and eight stories. The largest part of the structures would have an east-west orientation to optimize the use of daylight and energy efficiency. The building organization also relates well to the direction of stormwater flow from east to west. The courtyards would be secured to provide open space for building occupants. Buildings could be linked below grade at these elevation drops to facilitate internal circulation. The buildings would fit naturally on the site minimizing the need to disturb existing topography and vegetation on the plateau site. Building B1 would be stepped down into the ravine near Building 56/57 to stabilize the slope in that area. Building 56/57 would be integrated into the design of Building B1 to provide a connection between the historic and new construction. Buildings 52 and 64 would be retained, rehabilitated and adaptively reused. Buildings 60, 66, 67, 68, and 69, which total 65,295 gsf, would be demolished under Alternative B.

Under Alternative B, 175,000 gsf of office space would be constructed on the Sweetgum Lane site (proposed Building C1) in the same manner as Alternative A.

Under Alternative B, an additional 535 parking spaces would be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces would be added to the previously proposed underground parking garage on the west side of the campus.

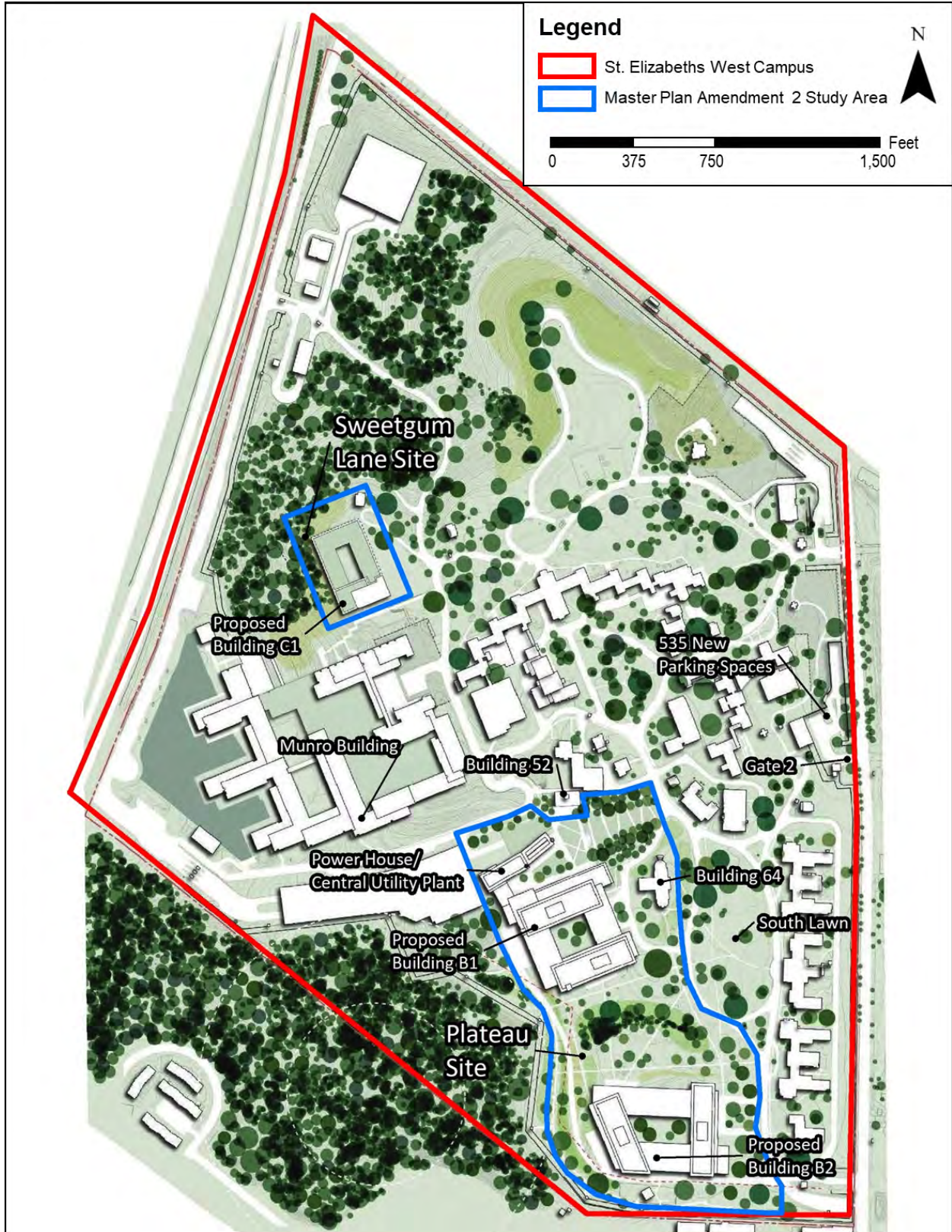
Detailed building and site design of the plateau and Sweetgum Lane sites would define the following improvements:

- Sidewalk locations around and between buildings
- Specific improvements to the ravine including enhanced pedestrian connections and landscaping
- Engineering for stabilization of steep slopes including building foundations



- Realignment of site drainages and landscaping in response to building design
- Shuttle bus drop-off locations
- Shipping/receiving areas for buildings
- Electric power, communications, and utility corridors designed for buildings and site improvements
- Stormwater management controls





Source: ZGF Olin, 2019

Figure 2-5: Master Plan Amendment 2 Alternative B

**Table 2-3: Alternative B Proposed Development**

Activity	Above Grade gsf	Below Grade gsf	Total gsf
Plateau Site—Building B1 Construction	630,000	0	630,000
Plateau Site—Building B2 Construction	570,000	0	570,000
Sweetgum Lane Site—Building C1 Construction	25,000	150,000	175,000
Structures to be Demolished	68,044	0	68,044
West Campus Parking Structures Construction	478,900	1,112,900	1,591,800
Activity	Above Grade Spaces	Below Grade Spaces	Total Spaces
West Campus Parking Spaces Addition (1:4 Parking Ratio)	2,090	1,535	3,625



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### 3 AFFECTED ENVIRONMENT

#### 3.1 Regulatory Setting

This section identifies the applicable Federal, state, and local laws and regulations related to air emissions that GSA has considered in rendering a decision with regards to the proposed Master Plan Amendment 2.

##### 3.1.1 Clean Air Act and National Ambient Air Quality Standards

Air quality is regulated at the Federal level through the Clean Air Act (CAA). The Environmental Protection Agency (EPA) adopted the CAA in 1970 and its amendments in 1977 and 1990. Pursuant to the CAA, EPA has established nationwide air quality standards to protect public health and welfare. These standards, known as the National Ambient Air Quality Standards (NAAQS) (40 Code of Federal Regulations [CFR] 50), represent the maximum allowable concentrations of selected pollutants in ambient air. NAAQS were developed for six criteria pollutants (**Table 3-1**): ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), particulate matter less than 10 microns in aerodynamic diameter (PM<sub>10</sub>) and particulate matter less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead. NAAQS include Primary Standards that protect public health, including protecting the health of “sensitive” populations such as asthmatics, children, and the elderly, and the Secondary Standards that protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings (EPA, 2019a).

The CAA requires EPA to classify regions with respect to each criteria pollutant, depending on whether the area’s monitored air quality meets the national standards. A region that is meeting the air quality standard for a given pollutant is designated as being in “attainment” for that pollutant. If the region does not meet the air quality standard, it is designated as being in “nonattainment” for that pollutant. An area that was designated as nonattainment and has been re-designated to attainment and has a Federal-approved maintenance plan is in “maintenance” for that pollutant. Areas may be designated as attainment for some standards and nonattainment or maintenance for others (40 CFR 93.125).

The 1977 CAA amendment requires that each state develop and maintain a State Implementation Plan (SIP) for each criteria pollutant that violates the applicable NAAQS. The SIP aims to minimize emissions of pollutants that exceed ambient threshold criteria, with the objective to achieve compliance with the NAAQS. In 1990, the CAA was amended to strengthen regulation of stationary and mobile emission sources for criteria pollutants.

**Table 3-1: National Ambient Air Quality Standards**

Pollutant	Averaging Time	Primary Standards	Secondary Standards	Standard Form
Ozone	8 hours	0.070 ppm	0.070 ppm <sup>a</sup>	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
PM <sub>10</sub>	24 hours	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Not to be exceeded more than once per year on average over 3 years

**Table 3-1: National Ambient Air Quality Standards**

Pollutant	Averaging Time	Primary Standards	Secondary Standards	Standard Form
PM <sub>2.5</sub>	Annual arithmetic mean 24 hours	12 µg/m <sup>3</sup> 35 µg/m <sup>3</sup>	15 µg/m <sup>3</sup> 35 µg/m <sup>3</sup>	Annual mean, averaged over 3 years 98th percentile, averaged over 3 years
CO	8 hours 1 hour	9 ppm 35 ppm	— —	Not to be exceeded more than once per year
NO <sub>2</sub>	Annual arithmetic mean 1 hour	0.053 ppm 100 ppb	0.053 ppm —	Annual mean 98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
SO <sub>2</sub>	3 hours 1 hour	— 0.075 ppm <sup>b</sup>	0.5 ppm —	Not to be exceeded more than once per year 99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
Lead	Calendar quarter Rolling 3-month average	1.5 µg/m <sup>3</sup> (certain areas) 0.15 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup> <sup>c</sup> —	Not to be exceeded

Source: EPA, 2019a

<sup>a</sup> Final rule signed October 1, 2015, and effective December 28, 2015. The previous (2008) ozone standards also remain in effect in some areas.

<sup>b</sup> The previous SO<sub>2</sub> standards (0.14 ppm 24-hour and 0.03 ppm annual) will remain in effect in certain areas: a) any area for which it is not yet 1 year since the effective date of designation under the current (2010) standards, and b) any area for which an implementation plan providing for attainment of the current (2010) standard has not been submitted and approved and which is designated nonattainment under the previous SO<sub>2</sub> standards or does not meet the requirements of a State Implementation Plan (SIP) call under the previous SO<sub>2</sub> standards (40 CFR 50.4(3)). A SIP call is an EPA action requiring a state to resubmit all or part of its SIP to demonstrate attainment of the required NAAQS.

<sup>c</sup> In areas designated nonattainment for the lead standards prior to the promulgation of the current (2008) standards, and for which implementation plans to attain or maintain the current (2008) standards have not been submitted and approved, the previous standards (1.5 µg/m<sup>3</sup> as a calendar quarter average) also remain in effect.

µg/m<sup>3</sup> = micrograms per cubic meter

ppm = parts per million (by volume)

ppb = parts per billion (by volume)

### 3.1.2 General Conformity

Federal actions located in nonattainment and maintenance areas are subject to conformity requirements. Under the conformity provisions of the CAA, no Federal agency can approve or undertake a Federal action or project unless it has been demonstrated to conform to the applicable SIP. The EPA Final Conformity Rule implements Section 176(c) of the CAA, as amended in 42 United States Code (USC) 7506(c). These conformity provisions were enacted so that Federal agencies would not interfere with efforts to attain the NAAQS. The EPA has issued two conformity regulations: (1) transportation conformity rules that apply to transportation plans and projects, and (2) general conformity rules that apply to all other Federal actions. As the proposed project is not a Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) transportation project, the project is subject to general conformity requirements. A conformity demonstration is only required for the alternative that is ultimately selected and approved.



Applicable only in areas designated as nonattainment or maintenance for NAAQS, the general conformity rule prohibits any Federal action that does not conform to the applicable air quality attainment plan or SIP. The purpose of the rule is to ensure that Federal actions do not cause or contribute to:

- New violations of the NAAQS;
- Worsening of existing violations of the NAAQS; or
- Delays in attaining the NAAQS.

General conformity applicability analysis requires quantification of direct and indirect construction and operation emissions for the project in tons per year and comparison of those emission levels to baseline emission levels. An action is exempt from further general conformity analysis (i.e., the action is presumed to conform) if the total net project-related emissions (construction and operation) would be less than the *de minimis* thresholds as in 40 CFR 93.153(b). If the net emissions increases associated with the project exceed the applicable general conformity *de minimis* levels for the peak year or any milestone year for attainment of NAAQS, a formal general conformity demonstration is required. An action that would produce emissions that exceed conformity thresholds is required to demonstrate conformity with the SIP through mitigation or other accepted practices.

Because the project is in a nonattainment area for ozone NAAQS, it is subject to general conformity rule. Applicability analysis was performed, as discussed in Section 4.2.3.

### 3.1.3 Stationary Source Permitting Requirements

Projects involving stationary sources that would emit air pollutants need to comply with applicable Federal, state, and local requirements. The Federal CAA provides the EPA with the primary legal authority to regulate air pollution from stationary sources. The EPA has promulgated the several stationary source regulatory programs to implement the requirements of the 1990 CAA. Like most Federal statutes, the CAA is primarily implemented by state, local, and tribal authorities that have been delegated implementing and regulatory authority by EPA (EPA, 2019b).

Section 111 of the CAA directs EPA to establish pollution control requirements for certain stationary sources which emit significant criteria air pollutants. These requirements are known as new source performance standards (NSPS) and apply to newly constructed sources and those that undergo major upgrades or modifications. The NSPS include both equipment specifications and operation and measurement requirements. The NSPS are developed and implemented by EPA and have been delegated to the states.

The CAA also establishes permitting programs designed to carry out the goals of the Act. New and modified stationary sources are subject to New Source Review (NSR) regulations, preconstruction permitting programs established as part of the 1977 CAA Amendments. NSR permits are legal documents by which facility owners/operators must abide. The permits specify what construction is allowed, what emission limits must be met, and often how the emissions source may be operated.

The Federal operating permitting program for major sources, also known as Title V of the CAA, is implemented under 40 CFR 70. Title V permits require sources to comply with all applicable Federal, state, or local orders, rules, and regulations. Permit applications include emission estimates based on potential-to-emit, identification of all emission sources and controls, a compliance plan, and a statement indicating each source's compliance status. West Campus utility plants operate

under a Title V permit. Existing conditions and the permitting needs of the project are discussed in Sections 3.2.2 and 4.2.2, respectively.

### 3.1.4 Air Toxics

In addition to the criteria pollutants, EPA also regulates air toxic or hazardous air pollutant (HAP) emissions. Controlling air toxic emissions became a national priority with the passage of the CAA Amendments (CAAA) of 1990, whereby Congress mandated that the EPA regulate 188 HAPs. National Emission Standards for Hazardous Air Pollutants (NESHAPS) are emission standards developed for HAPs at major and area sources to protect the public health with an ample margin of safety and to prevent any significant and adverse environmental effects. The post-1990 NESHAPS require the maximum achievable control technology for particular industrial source categories and are often referred to as “MACT standards.” Regional requirements for air toxics and HAPs are included DC Municipal Regulations (DCMR) Chapter 20-7: Volatile Organic Compounds and Hazardous Air Pollutants and Chapter 20-14: Air Toxics and Hazardous Air Pollutants.

For mobile sources, the EPA assessed the list of 188 HAPs in their latest rule on the Control of Hazardous Air Pollutants from Mobile Sources (Federal Register [FR], Vol. 72, No. 37, page 8430, February 26, 2007) and identified a group of 93 compounds emitted from mobile sources that are listed in their Integrated Risk Information System (IRIS). EPA identified nine compounds with significant contributions from mobile sources that drive or contribute to the national- and regional-scale cancer risk estimates and/or non-cancer hazards identified in the 2011 National Air Toxics Assessment. These compounds, called priority mobile source air toxics (MSATs), are 1,3-butadiene, acetaldehyde, acrolein, benzene, diesel particulate matter (PM), ethylbenzene, formaldehyde, naphthalene, and polycyclic organic matter (FHWA, 2016). No Federal or state ambient air quality standards exist for MSATs at this time.

Existing conditions and potential impacts of air toxics emissions from mobile sources due to Master Plan Amendment 2 are discussed in Section 3.2.3 and 4.2.2, respectively.

### 3.1.5 Greenhouse Gases

Greenhouse gases (GHG) include both naturally occurring and anthropogenic gases that trap heat in the earth's atmosphere. GHGs include, but are not limited to, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydro-chlorofluorocarbons (HCFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF<sub>6</sub>). These gases trap the energy from the sun and help maintain the temperature of the Earth's surface, creating a process known as the greenhouse effect (EPA, 2019d).

EPA's authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing CAA and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. On December 7, 2009, EPA signed the Final Endangerment and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the CAA. The endangerment finding states that current and projected concentrations of the six key GHGs in the atmosphere—CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HCFC, PFC, and SF<sub>6</sub>— could threaten the public health and welfare of current and future generations. Furthermore, EPA found that GHGs from motor vehicles contribute to the GHG concentrations that threaten public health and welfare.

On June 26, 2019, Council on Environmental Quality (CEQ) published *Draft National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions* in the Federal Register (84 FR 30097)

and the public comment period ended on August 26, 2019. The draft guidance discusses how National Environmental Policy Act (NEPA) analysis and documentation should address GHG emissions. If finalized, the guidance would replace the final guidance CEQ issued on August 1, 2016, entitled *Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews*, which was withdrawn on April 5, 2017 for further consideration pursuant to Executive Order 13783 of March 28, 2017, “Promoting Energy Independence and Economic Growth.”

Relevant regulations and climate action plans at Federal and District levels are discussed further in the following sections. Existing conditions and GHG emissions associated with the project are discussed in Sections 3.2.4 and 4.2.4, respectively.

### 3.1.5.1 Mobile Source GHG Regulations

Climate change and its associated effects are being addressed through various efforts at the Federal level to improve fuel economy and energy efficiency. Based on the endangerment finding, the EPA and the National Highway Traffic Safety Administration (NHTSA) took coordinated steps to enable the production of a new generation of clean vehicles with reduced GHG emissions and improved fuel efficiency from on-road vehicles and engines. EPA in conjunction with the NHTSA issued the first of a series of GHG emission standards for new cars and light-duty vehicles in April 2010 and significantly increased the fuel economy standards for all new passenger cars and light trucks sold in the country. The standards required these vehicles to meet an average fuel economy of 34.1 miles per gallon by 2016. In August 2012, the Federal government adopted the second rule that increases fuel economy for the fleet of passenger cars, light-duty trucks, and medium-duty passenger vehicles for model years 2017 and beyond to average fuel economy of 54.5 miles per gallon by 2025. As part of the 2017-2025 standards rulemaking, EPA conducted a Midterm Evaluation of the longer-term standards for model years 2022-2025 and proposed in 2018 to amend the Corporate Average Fuel Economy and greenhouse gas emissions standards for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026 (83 FR 16077).

In October 2016, NHTSA and EPA issued a Final Rule for “Phase 2” for medium- and heavy-duty vehicles to improve fuel efficiency and cut carbon pollution (i.e. GHG emissions). The agencies estimate that the standards will save up to 2 billion barrels of oil and reduce CO<sub>2</sub> emissions by up to 1.1 billion metric tons over the lifetimes of model year 2018–2027 vehicles.

In March 2017, Presidential Executive Order 13783, Promoting Energy Independence and Economic Growth, was signed. EO 13783 orders all Federal agencies to apply cost-benefit analyses to regulations of GHG emissions and evaluations of the social cost of carbon, N<sub>2</sub>O, and CH<sub>4</sub>.

### 3.1.5.2 Stationary Source GHG Regulations

In addition to mobile source GHG regulations, EPA also issued regulations for certain stationary sources that emit GHGs. On October 30, 2009, EPA adopted the Mandatory Greenhouse Gas Reporting Rule (MRR) (40 CFR 98). Facilities that emit 25,000 metric tons per year or more of carbon dioxide equivalent (CO<sub>2</sub>e) emissions are subject to the MRR and must report their emissions annually to EPA. Currently, GHG emissions from the stationary sources at West Campus are lower than the threshold thus are not subject to the MRR reporting requirements.

### 3.1.5.3 District of Columbia

At the local level, the Sustainable DC Plan is the District’s first sustainability plan. In January 2013, Mayor Gray signed the Sustainable DC Act of 2012 (DOEE, 2013) into law. The Act is designed to help promote energy efficiency and renewable energy, including clean energy financing and supporting renewable energy incentive programs. The Sustainable DC Plan establishes goals and targets for responding to climate change, including commitments to reduce greenhouse gas emissions by 50 percent below 2006 levels by 2032 and 80 percent by 2050, and to advance climate adaptation and preparedness to make the District resilient to future climate change. The Sustainable DC 2.0 was released in April 2019, reaffirming the climate targets. The District also committed to a goal of becoming carbon neutral by 2050, which means that the District will eliminate GHG emissions or offset any remaining emissions by supporting initiatives outside the District that will reduce emissions (DOEE, 2019a).

## 3.2 Existing Conditions

### 3.2.1 Attainment Status and Air Quality Monitoring Data

Air pollution in the District is primarily due to emissions from vehicles and air pollution transported from other states (DOEE, 2014). The District is currently designated as nonattainment for the 1997, 2008, and 2015 8-hour ozone standards and is in attainment or unclassified for all other criteria pollutants (EPA, 2019e). The project is subject to general conformity requirements for ozone, as further discussed in Section 4.2.3.

The DOEE operates an air monitoring network that measures the District’s air pollutants.

**Table 3-2** summarizes the monitored pollutant concentrations and the number of days each year that the measured concentrations were greater than the NAAQS from 2015 to 2017. **Table 3-2** presents the worst-case concentrations of all stations in the District. As shown in **Table 3-2**, the 8-hour ozone concentrations exceeded NAAQS in the past 3 years. NAAQS were not exceeded for other pollutants and averaging time periods.

**Table 3-2: Monitored Pollutant Concentrations in the District**

Pollutant	Parameter	NAAQS	2015	2016	2017
CO	Max. 1-hour concentration (ppm)	35	2.2	2.7	2.7
	Max. 8-hour concentration (ppm)	9	2.2	2.6	2.6
	# Days > 1-hour std. of 35 ppm	35	0	0	0
	# Days > 8-hour std. of 9 ppm	9	0	0	0
Ozone	Fourth highest 8-hour concentration (ppm)	0.070	<b>0.072</b>	<b>0.072</b>	<b>0.071</b>
	# Days 8-hr max. > 8-hour std. of 0.070 ppm	0.070	4	4	4
NOx	98th Percentile 1-hour concentration (ppm)	0.100	0.053	0.059	0.058
	Annual average (ppm)	0.053	0.018	0.018	0.015
	# Days > 1-hour std. of 0.100 ppm	0.100	0	0	0
PM <sub>10</sub>	Max. 24-hour concentration (µg/m <sup>3</sup> )	150	44	46	45
	# Days > 24-hour std. of 150 µg/m <sup>3</sup>	150	0	0	0
	98th Percentile 24-hour concentration (µg/m <sup>3</sup> )	35	28	23	20

**Table 3-2: Monitored Pollutant Concentrations in the District**

Pollutant	Parameter	NAAQS	2015	2016	2017
PM <sub>2.5</sub>	Annual average (µg/m <sup>3</sup> )	12	10.0	N/A	10.2
	# Days > 24-hour std. of 35 µg/m <sup>3</sup>	35	N/A	N/A	N/A
SO <sub>2</sub>	99th Percentile 1-hour concentration (µg/m <sup>3</sup> )	0.075	0.013	0.008	0.004
	# Days > 1-hour std. of 0.075 ppm	0.075	0	0	0

Source: EPA, 2019b

Bolded values indicate exceedances.

N/A = Information is not available

### 3.2.2 Stationary Source

The West Campus is currently operating under a Title V permit for the boilers and emergency generators at its Central Utility Plant (CUP) and the Modular Utility Plant (MUP). The utility plants provide heating, cooling, and emergency power needs to support the DHS operation. Operation of the utility plants are in compliance with the Federal and District rules. Currently, the utility plants are not subject to EPA’s GHG reporting requirements.

### 3.2.3 Air Toxics

The regional or local air toxic concentrations of Mobile Source Air Toxics (MSAT) emissions are affected by changes of vehicle mix types and miles traveled. MSAT emissions are expected to be lower than present levels in future years nationwide. Using EPA’s Motor Vehicle Emission Simulator (MOVES)<sup>1</sup>, the MOVES2014a model (EPA, 2015a), FHWA estimates that even if vehicle miles traveled (VMT) increase by 45 percent from 2010 to 2050 as forecasted, a combined reduction of 91 percent in the total annual emissions for the priority MSATs is projected for the same time period. Diesel PM is the dominant component of MSAT emissions, making up 50 to 70 percent of all priority MSAT pollutants by mass, depending on calendar year (FHWA 2016). Vehicles traveling near the project area would emit air toxics, however, roadways near the project area does not have heavy diesel traffic (Jacobs, 2019).

### 3.2.4 GHG

The District’s first GHG inventory was completed in 2006; the most recent GHG inventory was completed in 2016. The District’s GHG inventory tracks emissions by source and sector. Sources refer to the fuels that produce energy, and sectors are the main energy-consuming areas of the economy. In the District, emissions come from three main sectors: buildings (75 percent), transportation (21 percent), and waste (4 percent) in 2016. Within these sectors, the main sources of emissions are electricity (57 percent), gasoline (19 percent), and natural gas (17 percent).

The District’s GHG emissions totaled 7.5 million metric tons of CO<sub>2</sub>e in 2016, which is a 28 percent decrease since the 2006 inventory and a 6 percent decrease since the last report in 2013. Key drivers

<sup>1</sup> EPA’s MOVES is an emission modeling system that estimates emissions for mobile sources at the national, county, and project level for criteria air pollutants, greenhouse gases, and air toxics.

behind the reductions since 2006 were an increasingly cleaner electric grid, reduced energy use intensity per square foot of building space, and increased vehicle fuel economy (DOEE, 2019b).

In 2016, GHGs associated with District Government operations fell 24 percent since 2006 and 9 percent since 2013.. These reductions were driven by lower emissions from buildings and facilities, partly due to the cleaner regional electric grid. As a result, the District is on track to meet its ambitious goals to halve emissions by 2032 and to become carbon neutral by 2050 (DOEE, 2019b).

The majority of the GHG emissions associated with the St. Elizabeths campus operation are from the heating and energy demand, as well as emissions from vehicle travel to and from the facility. Anticipated GHG emission changes due to the project are discussed in Section 4.2.4.

### 3.2.5 Sensitive Receptors

Sensitive air quality receptors include receptors such as residences, schools, daycare centers, nursing homes, and hospitals. The ambient air concentrations shown in **Table 3-2** are representative of the existing conditions experienced by sensitive receptors located in the project area. The West Campus is bounded by I-295 to the west and Martin Luther King Jr. Avenue SE to the east. Areas west of the I-295 are mostly industrial/commercial land uses. The area east of Martin Luther King Jr. Avenue SE is the East Campus. The areas immediately to the north and south of the West Campus are mostly residential. The nearest sensitive receptor other than residents is the Friendship Southeast Elementary Academy PCS outside of the south boundary at 645 Milwaukee Place. Excel Academy Public Charter is located approximately 1200 feet north of the West Campus. The St. Elizabeths Hospital is located in the East Campus, southeast of the West Campus.



## 4 ENVIRONMENTAL CONSEQUENCES

This section discusses the potential air quality impacts associated with the emissions from construction and operation of the No Action Alternative, Alternative A, and Alternative B of the Master Plan Amendment 2.

This AQTR uses the impacts of Alternative Concept B of Master Plan Amendment 1 from the 2012 EIS (i.e., the 2012 Preferred Alternative) as the baseline scenario for the air quality impacts analysis for the Master Plan Amendment 2. The analysis evaluates whether the changes proposed in Master Plan Amendment 2's No Action and Build Alternatives would cause additional adverse air quality impacts compared to Master Plan Amendment 1. Under Master Plan Amendment 1, the East Campus would include approximately 750,000 square feet of building development and 775 parking spaces, and the West Campus would include approximately 3,830,000 square feet of building development and 3,459 parking spaces, for a total of 4,580,000 square feet of office and shared-use space and 4,234 new parking spaces for East and West Campus.

Air quality impacts for the baseline scenario are summarized in Table ES-1 in the 2012 EIS and include the following:

- Overall impacts on air quality for implementing the site development and transportation improvement would be short- and long-term, minor, and adverse (GSA, 2012a).
- Impacts on air quality for North Parcel site development at East Campus would be short term to long term, minor, and adverse from construction activities and new stationary sources (GSA, 2012a).

### 4.1 No Action Alternative

Under the No Action Alternative for Master Plan Amendment 2, the DHS Headquarters and the Munro Building would consolidate to the West Campus, and the East Campus would include development of office space and parking on the North Parcel. The West Campus would include approximately 3,830,000 square feet of building development and 3,459 parking spaces, for a total of 4,580,000 square feet of office and shared-use space and 4,234 new parking spaces for East and West Campus. The East Campus development, which include approximately 750,000 square feet of building development and 775 parking spaces, would not be implemented, as discussed in Section 2.2.2.1.

Because there would be no change to West Campus development component under No Action compared to Master Plan Amendment 1, air quality impacts from No Action Alternative would remain the same as those of Master Plan Amendment 1. Air quality impacts due to East Campus would be eliminated under the No Action Alternative, resulting in overall lower impacts than Master Plan Amendment 1.

### 4.2 Alternatives A and B

The following sections provide impacts evaluation for the short-term and long-term emissions associated with construction and operation of the Master Plan Amendment 2 build alternatives. Because the only differences between Alternatives A and B are the building development locations on West Campus, the construction and operation emissions and the associated air quality impacts



are expected to be similar for the two build alternatives. In comparison to the impacts identified for the Master Plan Amendment 1, this air quality evaluation concludes that neither build alternative for Master Plan Amendment 2 would create additional adverse air quality impacts from stationary or mobile source emissions, and impacts on air quality from North Parcel site development at East Campus would be eliminated. This finding is discussed in greater detail in the following sections.

#### 4.2.1 Short-term Construction

Construction activities for the Master Plan Amendment 2 build alternatives would have the potential to result in short-term construction equipment-related emissions and fugitive dust in the project vicinity. Emissions during construction at West Campus would be generated by fuel combustion in motor vehicles and construction equipment, and fugitive particulate emissions would result from soil disturbance, earthwork, and other construction activities. Construction emissions would be short term, occurring only while construction work is in progress. The Master Plan Amendment 2 build alternatives would result in lower construction emissions compared to the Master Plan Amendment 1 due to the elimination of construction activities at East Campus, the reduced size and extent of total building and parking space development, and the reduced size and extent of building demolition.

As shown in **Table 4-1**, under Master Plan Amendment 2, the East Campus development proposed in the Master Plan Amendment 1 would not be implemented and associated parking spaces would be reduced in number and moved to West Campus. The West Campus would be able to accommodate the office space needs with only a minor increase of approximately 312,000 square feet, while 750,000 square feet of building development at East Campus would be eliminated. In total, Master Plan Amendment 2 would reduce approximately 438,000 square feet of building development compared to the Master Plan Amendment 1, resulting in lower construction emissions from building development.

The 775 new parking spaces planned for East Campus under the Master Plan Amendment 1 would be eliminated. Instead, an additional 166 parking spaces would be built at West Campus. Master Plan Amendment 2 would reduce a total of 609 parking spaces compared to the Master Plan Amendment 1. Therefore, construction emissions associated with parking structure development would be reduced.

Demolition emissions would also be lower than under the Master Plan Amendment 1, because the Master Plan Amendment 2 build alternatives would reduce the total square footage of building demolition by approximately 209,690 square feet, as shown in **Table 4-2**.

Because of the decreased sizes of building construction, parking space development, and building demolition, the proposed Master Plan Amendment 2 build alternatives would have overall lower construction emissions than the emissions from the Master Plan Amendment 1. Therefore, no additional adverse air quality impacts would be associated with the Master Plan Amendment 2 build alternatives. Furthermore, the project would comply with Federal and District regulations, including the EPA's emission standards for on-road vehicles, off-road construction equipment, and the DCMR Chapter 20-9: Motor vehicular Pollutants, Lead, Odors, and Nuisance Pollutants. The project would also implement best management practices as discussed in Section 5.5.4 of the 2012 EIS, to avoid or minimize temporary construction emissions.

**Table 4-1: Comparison of Building and Parking Construction Activities**

Construction	Master Plan Amendment 1	Alternative A Alternative B	Changed from Master Plan Amendment 1
West Campus Building Development (gsf)	3,830,386	4,142,740	312,354
East Campus Building Development (gsf)	750,000	Eliminated	-750,000
West Campus Parking Structures (gsf)	1,216,500	1,591,800	375,300
East Campus Parking Structures (gsf)	271,250	Eliminated	-271,250
West Campus Parking Spaces	3,459	3,625	166
East Campus Parking Spaces	775	Eliminated	-755
Total Campus Building Development (gsf)	4,580,386	4,142,740	-437,646
Total Parking Structure (gsf)	1,487,750	1,591,800	104,050
Total Parking Spaces	4,234	3,625	-609

Source: ZGF, 2019

**Table 4-2 Comparison of Building Demolition Activities**

Demolition	Master Plan Amendment 1	Alternative A Alternative B	Changes from Master Plan Amendment 1
Demolition on East Campus (gsf)	274,985	Eliminated	-274,985
Demolition on West Campus (gsf)	0	68,044	68,044
Total Demolition (gsf)	274,985	68,044	-206,941

Source: Stantec, 2019

Transportation improvements proposed under Master Plan Amendment 2 for the roadways and intersections outside of the West Campus would require minimal construction activities. Transportation improvements would largely rely on lane re-configuration, signal phasing changes, signal timing changes, and relocation of shuttle stops. None of the proposed transportation improvements would substantially increase the amount of construction equipment in use. Therefore, construction activities associated with transportation improvements for the Master Plan Amendment 2 would be minimal compared to the proposed building and parking structure construction activities at West Campus and would not substantially add to the construction-related air quality impacts previously discussed.

## 4.2.2 Long-term Operation

### 4.2.2.1 Stationary Sources

The West Campus currently operates a CUP to support the West Campus heating and energy needs. The CUP is operating under a Title V operating permit (Permit Number 044) pursuant to Chapters 20-2 and 20-3 of the DCMR. The heating and electricity needs of the Master Plan Amendment 2 build alternatives would be met by the existing equipment and operational capacity at the CUP.

Operation of the CUP equipment would continue to comply with applicable DCMR and EPA requirements for emission control, monitoring, reporting, and record keeping.

Additional equipment planned to be installed at East Campus under Master Plan Amendment 1, including boilers and generators, would no longer be needed. Air pollutant emissions from stationary sources under Master Plan Amendment 2 would be similar to those analyzed in the 2012 EIS for West Campus. The equipment emissions associated with East Campus development would be eliminated under Master Plan Amendment 2. Therefore, no additional adverse impacts from stationary sources emissions would be expected.

#### 4.2.2.2 Mobile Sources

##### 4.2.2.2.1 Regional Vehicle Emissions

Vehicles affect air quality by emitting airborne pollutants. Changes in traffic volumes, travel patterns, and roadway locations affect air quality by changing the number of vehicles and the congestion levels in a given area. Master Plan Amendment 2 would move the office space development from East Campus to the West Campus, as a result, vehicles that previously would travel to or from the planned East Campus North Parcel under the Master Plan Amendment 1 would travel to the West Campus. The overall number of vehicles traveling to or from the project area would remain unchanged compared to the Master Plan Amendment 1. The two campuses are adjacent to each other, separated only by the Martin Luther King Jr. Avenue SE; therefore, at a regional scale, travel distances for commute and service vehicles would be similar to those under the Master Plan Amendment 1. Therefore, vehicle emissions associated with the Master Plan Amendment 2 build alternatives would not cause additional adverse impacts to regional air quality.

##### 4.2.2.2.2 Localized Impacts

Although the overall vehicle emissions at the regional scale would be similar to those under the Master Plan Amendment 1, some of the vehicles that would have traveled to and from the East Campus would take different routes under Master Plan Amendment 2 to access the West Campus. Increased numbers of vehicles using roadways near the West Campus could potentially cause localized air quality impacts.

Accumulation of localized CO emissions from vehicles would likely occur at intersections with increased traffic congestion, such as intersections with level of service (LOS) worse than D. As shown in **Table 4-3**, traffic conditions at a majority of the intersections near West Campus would not deteriorate with implementation of Master Plan Amendment 2. The comparisons of the LOS of the affected intersections in the project area for Master Plan Amendment 1 and Alternatives A and B are shown in **Table 4-3**.

Out of the 38 signalized intersections in 2035 under Alternatives A and B in the study area, 26 intersections would either have LOS A, B, or C that are not expected to cause localized CO hot spots (EPA, 1992); or have the same or slightly better LOS than the traffic conditions at these intersections under Master Plan Amendment 1, indicating that the Master Plan Amendment 2 build alternatives would not cause additional localized CO impacts than Master Plan Amendment 1 at these intersections.

Deteriorated traffic conditions of LOS D, E or F would occur during morning or evening peak hours at 12 intersections for Alternatives A and B compared to the conditions at these intersections

under Master Plan Amendment 1. Among these intersections, the worst-case LOS and traffic volume would occur at Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place intersection, which would have traffic volume of 3,605 and a LOS F during morning peak hour in 2035 (Jacobs, 2019). The rest of the 11 intersections would have lower volume and LOS D or E during peak hours.

Master Plan Amendment 1 performed detailed CO hot spot modeling for intersections at LOS F with higher traffic volumes in the study area, including the intersection at Suitland Parkway and Stanton Road with a traffic volume over 4,000 during peak hours. Master Plan Amendment 1 demonstrated that no violation to the CO NAAQS would occur at the modeled intersections. Because Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place intersection would have the same LOS but lower traffic volume than the Suitland Parkway and Stanton Road intersection conditions as analyzed for Master Plan Amendment 1, violation to CO NAAQS is not expected at this intersection. Similarly, the other 11 intersections with better LOS and lower traffic volume than the Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place intersection would have even lower CO impacts. As such, Master Plan Amendment 2 build alternatives are not expected to cause localized CO impacts that would violate the CO NAAQS.

**Table 4-3: Intersections Level of Service in 2035**

Intersection Name	Master Plan Amendment 1		Alternatives A/B	
	LOS (AM)	LOS (PM)	LOS (AM)	LOS (PM)
Martin Luther King Jr. Avenue SE and Good Hope Road	E	F	D	E
Good Hope Road and 13th Street	E	F	C	F
Martin Luther King Jr. Avenue SE and W Street	B	F	A	C
Martin Luther King Jr. Avenue SE and Morris Road	C	D	D	C
Martin Luther King Jr. Avenue SE and Talbert Street	A	C	C	C
Suitland Parkway and South Capitol Street	E	E	D	E
Howard Road and I-295 SB Off-Ramp	N/A	N/A	N/A	N/A
Howard Road and Firth Sterling Avenue/I-295 NB On-Ramp	D	D	B	B
Martin Luther King Jr. Avenue SE and Howard Road/Sheridan Road	C	D	D	D
Suitland Parkway and Firth Sterling Avenue	D	C	C	D
Suitland Parkway and Stanton Road	F	F	F	F
Firth Sterling Avenue and Barry Road/Sumner Road	A	B	A	B
Martin Luther King Jr. Avenue SE and Sumner Road/Stanton Road	D	C	D	D
South Capitol Street and Defense Boulevard/Firth Sterling Avenue	F	E	C	D
Martin Luther King Jr. Avenue SE and West Campus Gate 1/Golden Raintree Drive	B	C	E	C
Martin Luther King Jr. Avenue SE and Redwood Drive	B	C	B	B
Malcolm X Avenue and South Capitol Street NB	B	B	B	A
Malcolm X Avenue and South Capitol Street SB	A	D	B	C
Martin Luther King Jr. Avenue SE and Malcolm X Avenue	D	D	E	E
Martin Luther King Jr. Avenue SE and Raleigh Place	E	B	C	B
Martin Luther King Jr. Avenue SE and Alabama Avenue	C	A	D	B
Alabama Avenue and Randle Place	B	C	D	C

**Table 4-3: Intersections Level of Service in 2035**

Intersection Name	Master Plan Amendment 1		Alternatives A/B	
	LOS (AM)	LOS (PM)	LOS (AM)	LOS (PM)
Alabama Avenue and Wheeler Road	C	B	C	B
Martin Luther King Jr. Avenue SE/South Capitol Street/Halley Place	E	C	F	E
Good Hope Road and Minnesota Avenue	F	D	F	C
Alabama Avenue and 7th Street	C	B	A	A
Martin Luther King Jr. Avenue SE and West Campus Gate 3	A	A	B	B
Firth Sterling Avenue and St. Elizabeths Avenue	E	D	C	B
Firth Sterling Avenue and Eaton Road	D	C	A	A
Howard Road and Anacostia Metro Garage Entrance	A	A	A	C
West Campus Gate 4	F	C	B	C
Martin Luther King Jr. Avenue SE/11th Street Bridge and I-295 NB Off-Ramp	F	F	D	E
11th Street Bridge and I-295 SB On-Ramp	A	D	A	A
Suitland Parkway and I-295 NB	B	D	C	D
Suitland Parkway and I-295 SB	C	D	C	E
Martin Luther King Jr. Avenue SE and Suitland Parkway Diamond Interchange	C	C	E	C
Malcolm X Avenue and I-295 Interchange	C	B	D	C
Shepherd Parkway/St. Elizabeths Avenue/I-295 Ramps	B	B	C	B
Shepherd Parkway/St. Elizabeths Avenue/I-295 Ramps	B	B	D	B

Source: Jacobs, 2019

Localized PM emissions tend to accumulate at locations with substantial diesel truck traffic, but this type of truck traffic is not anticipated to occur on roadways and intersections near West Campus. Diesel trucks account for less than 6.5 percent of the vehicle travel on major arterials in the project study area, as shown in **Table 4-4**. The Master Plan Amendment 2 build alternatives would not introduce additional diesel truck traffic to the project area; therefore, Master Plan Amendment 2 is not expected to cause violations of the PM NAAQS in the project area.

**Table 4-4: Truck Percentage in the Project Area**

Roadway/Location	Daily Average Truck Traffic %	Daily Average Truck Traffic %
	Master Plan Amendment 1	Alternatives A/B
St. Elizabeths Avenue (north of Gate-4) NB	6	4.2
St. Elizabeths Avenue (north of Gate-4) SB	2.4	3.2
Malcolm X Avenue EB	3.1	2.5
Malcolm X Avenue WB	4	3.1
Lebaum Street SE (south of West Campus) EB	1.8	0.9
Lebaum Street SE (south of West Campus) WB	2.5	1.8

**Table 4-4: Truck Percentage in the Project Area**

Roadway/Location	Daily Average Truck Traffic %	Daily Average Truck Traffic %
Martin Luther King Jr. Avenue SE (south end of West Campus) NB	2.2	1.9
Martin Luther King Jr. Avenue SE (south end of West Campus) SB	2.2	1.8
Martin Luther King Jr. Avenue SE (north end of West Campus) NB	4	2.9
Martin Luther King Jr. Avenue SE (north end of West Campus) SB	3.6	2.7
Firth Sterling Avenue (north of West Campus) NB	17.1	6.5
Firth Sterling Avenue (north of West Campus) SB	11.2	3.8
Suitland Parkway EB	1.6	1.2
Suitland Parkway WB	1.9	1.3

Source: Jacobs, 2019

The DHS is investigating relocating the National Capital Region (NCR) screening mission from Cotton Annex to Gate 6 at West Campus. Although not part of the Master Plan Amendment 2 proposal, the potential cumulative effects from additional vehicle traffic, especially diesel traffic from Cotton Annex (recently moved to Buzzards Point) to Gate 6, was evaluated for potential localized diesel PM emissions impacts. The evaluation was based on the data from the Gate 6 Reconfiguration Alternative Analysis (CH2M, 2017).

The number of vehicles currently coming to Gate 6 during the morning peak hour is 17 on average, including two mid- to heavy-duty trucks, with the remainder as light-duty trucks and passenger vehicles. Assuming Gate 6 Reconfiguration and the relocation of the screening mission from the Cotton Annex, the number of vehicles coming to Gate 6 during the morning peak hour would be approximately 32, including 14 mid- to heavy-duty trucks, with the remainder as light-duty trucks and passenger vehicles. Traffic analysis performed for the Gate 6 Reconfiguration demonstrated acceptable LOS (LOS A, B, or C) at intersections along the local streets leading to Gate 6, even with the additional vehicles coming from the Cotton Annex (Buzzards Point). This indicates that the relocation of the NCR screening mission to Gate 6 would not deteriorate the traffic conditions in the project area. Therefore, localized air quality impacts at intersections near Gate 6 are not expected.

While the slow moving or idling diesel trucks in queue for screening at Gate 6 would emit air pollutants, including diesel PM, Gate 6 would have only approximately 14 mid- to heavy-duty trucks coming to Gate 6 during morning peak hour with the NCR relocation and the average dwell time for each vehicle at the three screening check locations would be 30 to 60 seconds. As not all these trucks would arrive at the same time in an hour, Gate 6 is not expected have large number of diesel trucks waiting at any given time. Substantial increases in PM emissions from diesel truck traffic that would cause violation to NAAQS are not expected near Gate 6.

According to EPA’s Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas (EPA, 2015b), PM hot spots usually occur at



locations with significant amounts of diesel trucks, such as a new or expanded highway with an average daily truck traffic volume over 10,000, or locations with a significant number of diesel vehicles congregating at a single location. Following EPA's guidance, the 14 diesel trucks during peak hour or a total of approximately 120 diesel trucks moving through the screening processes throughout the day would not indicate an air quality concern for localized PM impacts. In addition, the emissions from truck idling at Gate 6 would be minimized by compliance with the DOEE Engine Anti-idling Law, which restricts the vehicle idling time to less than 3 minutes. Therefore, emission increases from additional vehicle travel and queuing at Gate 6 are not expected to cause a localized PM hot spot or violate the NAAQS.

#### 4.2.2.2.3 Mobile Source Air Toxics

Potential MSAT effects from the vehicle emissions associated with Master Plan Amendment 2 were evaluated following the FHWA memorandum titled *Updated Interim Guidance on Air Toxic Analysis in NEPA Documents* (FHWA, 2016). According to the Guidance, Master Plan Amendment 2 would be considered a project with no meaningful potential of MSAT effects because it does not involve any highway expansion or increase of roadway capacity. The Master Plan Amendment 2 build alternatives would not attract additional vehicles traveling from elsewhere to the project area to cause additional adverse MSAT impacts compared to the Master Plan Amendment 1.

Moreover, EPA regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. Based on regulations now in effect, an analysis of national trends with EPA's MOVES2014a model forecasts a combined reduction of over 90 percent in the total annual emissions rate for the priority MSAT from 2010 to 2050, while vehicle-miles of travel are projected to increase by over 45 percent (FHWA, 2016). This will both reduce the background level of MSATs in the region, as well as the minor MSAT emissions from this project.

### 4.2.3 General Conformity

The Master Plan Amendment 2 build alternative would be implemented in the District area that is currently designated as marginal nonattainment for the 8-hour ozone ( $O_3$ ) NAAQS. Therefore, the project is subject to general conformity requirements for ozone and the ozone precursor pollutants, volatile organic compounds (VOCs), and nitrogen oxides ( $NO_x$ ).

The District area was once in maintenance for the 1997  $PM_{2.5}$  standard. On August 24, 2016, the EPA released the Fine Particulate Matter NAAQS: State Implementation Plan Requirements; Final Rule (FR 81, 58010-58162), effective on October 24, 2016. In this Final Rule, the EPA revoked the 1997 primary annual  $PM_{2.5}$  NAAQS for areas that were designated as attainment or maintenance for this NAAQS. After the effective date of the revocation, areas that have been in maintenance for the 1997 annual  $PM_{2.5}$  NAAQS will not be required to make transportation or general conformity determinations for the 1997 annual  $PM_{2.5}$  NAAQS (FR 81, 58142). Because the District has been in maintenance for the 1997 annual  $PM_{2.5}$  NAAQS and is in attainment of the 2012  $PM_{2.5}$  NAAQS, the District is no longer subject to conformity requirements for  $PM_{2.5}$ .

The area has been in maintenance for CO since the 1990s. A CO maintenance plan was first approved on March 16, 1996, and a second maintenance plan was completed on February 19, 2004, for attainment of the CO standard in the Washington DC-MD-VA attainment area through March 16, 2016. The region is now in attainment and conformity analysis for CO is no longer required.



The EPA Final Conformity Rule requires that total direct and indirect emissions of nonattainment and maintenance criteria pollutants and their precursors be considered in determining conformity. **Tables 4-5** present the *de minimis* thresholds for nonattainment areas. If the emissions associated with a Federal action, such as development of one of the Master Plan Amendment 2 build alternatives, would be less than the applicable *de minimis* thresholds, a detailed conformity analysis is not required, pursuant to 40 CFR 93.153(c). The applicable *de minimis* thresholds for Master Plan Amendment 2 are 100 tons per year (tpy) for NO<sub>x</sub> and 50 tpy for VOCs.

**Table 4-5: De Minimis Thresholds in Nonattainment Areas**

Pollutant	Degree of Nonattainment	<i>de minimis</i> Threshold <sup>a</sup> (tpy)
O <sub>3</sub> (VOCs and NO <sub>x</sub> )	Serious	50
	Severe	25
	Extreme	10
	Other O <sub>3</sub> – outside an O <sub>3</sub> transport region	100
O <sub>3</sub> (VOCs)	Marginal and moderate – inside an O <sub>3</sub> transport region	<b>50</b>
O <sub>3</sub> (NO <sub>x</sub> )	Marginal and moderate – inside an O <sub>3</sub> transport region	<b>100</b>
CO	All	100
PM <sub>10</sub>	Moderate	100
	Serious	70
PM <sub>2.5</sub>	Direct emissions, SO <sub>2</sub> , NO <sub>x</sub> , VOC, and Ammonia	
	Moderate	100
	Serious	70
Lead	All	25

<sup>a</sup> **Bold** values reflect *de minimis* thresholds used in this analysis. Source: 40 CFR 93.153(b)

As discussed in Section 4.2.1, Short-term Construction Emissions, construction emissions from either of the Master Plan Amendment 2 build alternatives would be lower than those for the Master Plan Amendment 1. Similarly, as discussed in Section 4.2.2.2, vehicle emissions associated with either of the Master Plan Amendment 2 build alternatives would be similar or lower than those for the Master Plan Amendment 1. Emissions from stationary sources are not expected to increase, as discussed in Section 4.2.2.1. The 2012 EIS demonstrated that total project-related emissions of NO<sub>x</sub> and VOC from construction and operations would be below the general conformity *de minimis* thresholds for the alternative equivalent to the Master Plan Amendment 1 in this AQTR. As a result, the total VOC and NO<sub>x</sub> emissions from Master Plan Amendment 2 build alternatives would also be below the applicable *de minimis* thresholds of 100 tpy, and the project would be assumed to conform. Further conformity analysis is not required.

#### 4.2.4 Greenhouse Gas

Currently, there are no applicable quantitative emission thresholds to evaluate the significance of GHG and climate change impacts associated with an individual project.

Direct GHG emissions would be generated during construction of the Master Plan Amendment 2 build alternatives due to the use of fuels in the construction equipment and vehicles. As a result of the reduced building and parking development under Master Plan Amendment 2, GHG emissions from construction are expected to be lower than those from the Master Plan Amendment 1.

The vehicle emissions from employee commute and delivery/service vehicles would be similar to those associated with the Master Plan Amendment 1. GHG emissions from vehicle operations under the Master Plan Amendment 2 build alternatives would exhibit the same trends as those discussed in Section 4.2.2 for other vehicle emissions.

GHG emissions from stationary sources under the Master Plan Amendment 2 build alternatives would be similar or lower than those under the Master Plan Amendment 1, because heating and electricity needs of Master Plan Amendment 2 operation would be incorporated into the existing CUP at West Campus. The equipment to be installed at East Campus would be eliminated. Therefore, direct GHG emissions from the Master Plan Amendment 2 build alternatives are not expected to increase compared to the Master Plan Amendment 1.

As previously discussed, construction and operation of the Master Plan Amendment 2 build alternatives would not cause GHG emissions to increase compared to the Master Plan Amendment 1. The reduced construction activities and the ability of the West Campus CUP to meet demand would likely reduce GHG emissions when compared to the Master Plan Amendment 1, which would be beneficial for the region, supporting goals to reduce GHG emissions by 50 percent below 2006 levels by 2032 and 80 percent by 2050, as defined in the Sustainable DC Plan (DOEE, 2013).

GHG emission reduction strategies that would be applied to the Master Plan Amendment 1, as discussed in Section 5.5.2.2 Greenhouse Gas and Global Warming in the 2012 EIS of the Master Plan Amendment 1 (GSA, 2012a), would still be implemented for Master Plan Amendment 2. Examples of the possible GHG reduction strategies include transitioning to high-performance buildings, using all resources more efficiently, incorporating green roofs and photovoltaic arrays, and installing energy-efficient HVAC systems.

#### 4.2.5 Avoidance, Minimization, and Mitigation

No mitigation measures related to short-term or long-term air quality and GHG impacts are warranted because emissions associated with construction and operation of the Master Plan Amendment 2 build alternatives would be similar or lower than Master Plan Amendment 1.

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APPENDIX C  
Noise Report

U.S. Department of Homeland Security Headquarters  
at St. Elizabeths West Campus Master Plan  
Amendment 2 **FINAL** Supplemental Environmental  
Impact Statement  
Noise Technical Report

Final Version

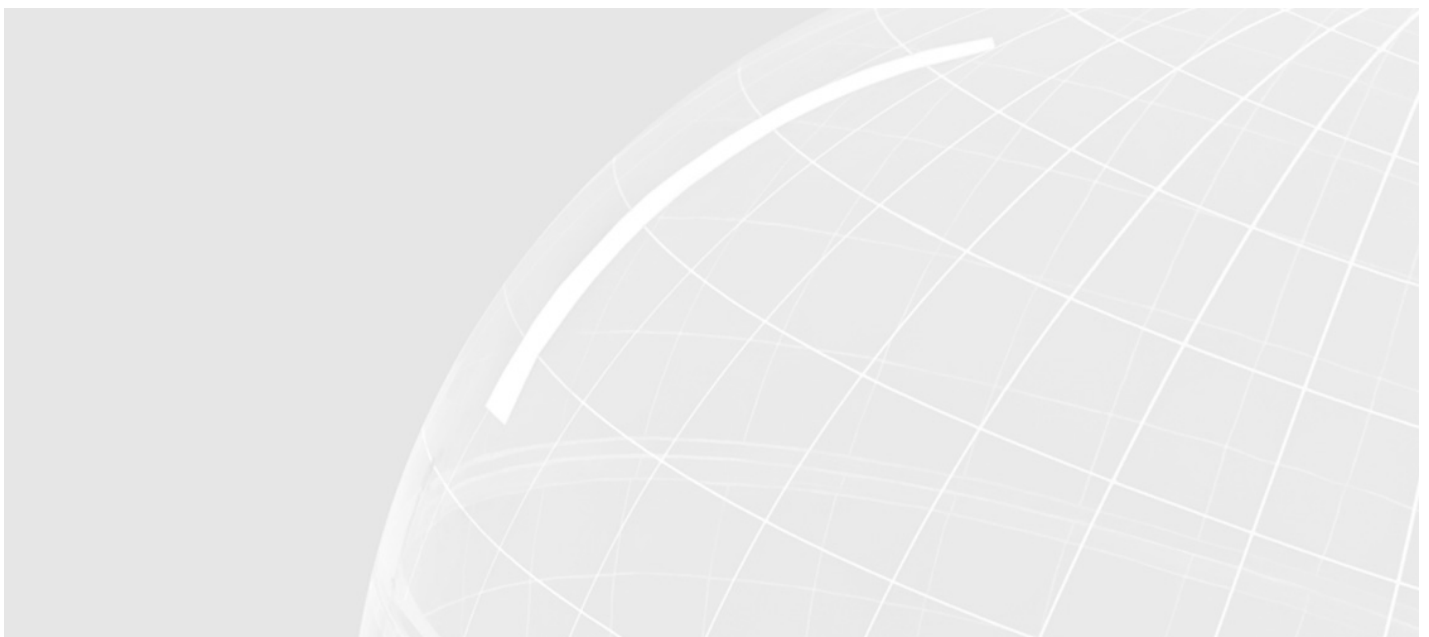
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## U.S. Department of Homeland Security Headquarters at St. Elizabeths West Campus Master Plan Amendment 2 Final Supplemental Environmental Impact Statement

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# 1 INTRODUCTION, BACKGROUND AND REPORT ORGANIZATION

## 1.1 Introduction

St. Elizabeths campuses are in Anacostia in southeast Washington, DC. Originally, they were the campuses for a formerly self-contained mental health community – St. Elizabeths Hospital. The U.S. Department of Health and Human Services (HHS) and its predecessors controlled and operated the hospital from its founding in 1855 until 1987, when the St. Elizabeths East Campus (East Campus) and hospital operations were transferred to the District of Columbia. St. Elizabeths continues to operate as an inpatient mental hospital on the southern portion of the East Campus. Portions of the St. Elizabeths West Campus (West Campus) were used for outpatient services until 2003, when it closed operations (outpatient care continued on the East Campus). In January 2001, HHS determined that it no longer had a need for the West Campus and declared the property “excess to its needs.” The U.S. General Services Administration (GSA) took control of the West Campus in December 2004.

Since 2008 the 176-acre West Campus has been under redevelopment for use as headquarters for the U.S. Department of Homeland Security (DHS) and its component agencies. The East Campus is slated for redevelopment into mixed-use neighborhoods of retail, office, housing, open space, and cultural amenities (**Figure 1**).

The West Campus and East Campus together were designated a National Historic Landmark (NHL) in 1991. GSA’s approved Final Master Plan called for a combination of rehabilitation of historic buildings and construction of new buildings to house DHS headquarters.

## 1.2 Background

On January 8, 2009, the National Capital Planning Commission (NCPC) approved the Final Master Plan for the DHS Headquarters Consolidation and the U.S. Commission of Fine Arts (CFA) approved the Final Master Plan on November 20, 2008. The Final Master Plan provides the development framework for accommodating 4.5 million gross square feet (gsf) of office space for the DHS headquarters on both the West Campus and East Campus. The Final Master Plan outlines 3.8 million gsf of office space on the West Campus and 750,000 gsf of office space on a portion of the East Campus (identified as East Campus North Parcel). The development would be consistent with a DHS Interagency Security Committee (ISC) Level V campus to house mission-critical Federal agencies. Part of the master planning process includes an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA), and compliance with the Section 106 regulations under the National Historic Preservation Act (NHPA).

In 2012, the GSA amended the Final Master Plan to include detailed planning, a 2012 EIS and an additional NHPA assessment for the East Campus North Parcel, including the widening of Martin Luther King Jr. Avenue SE, to accommodate a left-turn lane, a streetcar lane, and pedestrian-friendly sidewalks (collectively known as the Master Plan Amendment). Consistent with the Final Master Plan, the Master Plan Amendment 1 provided a framework for the future development considering historic and natural resources, site characteristics, circulation and access, and massing and density while meeting the programmatic needs of the DHS Consolidation.



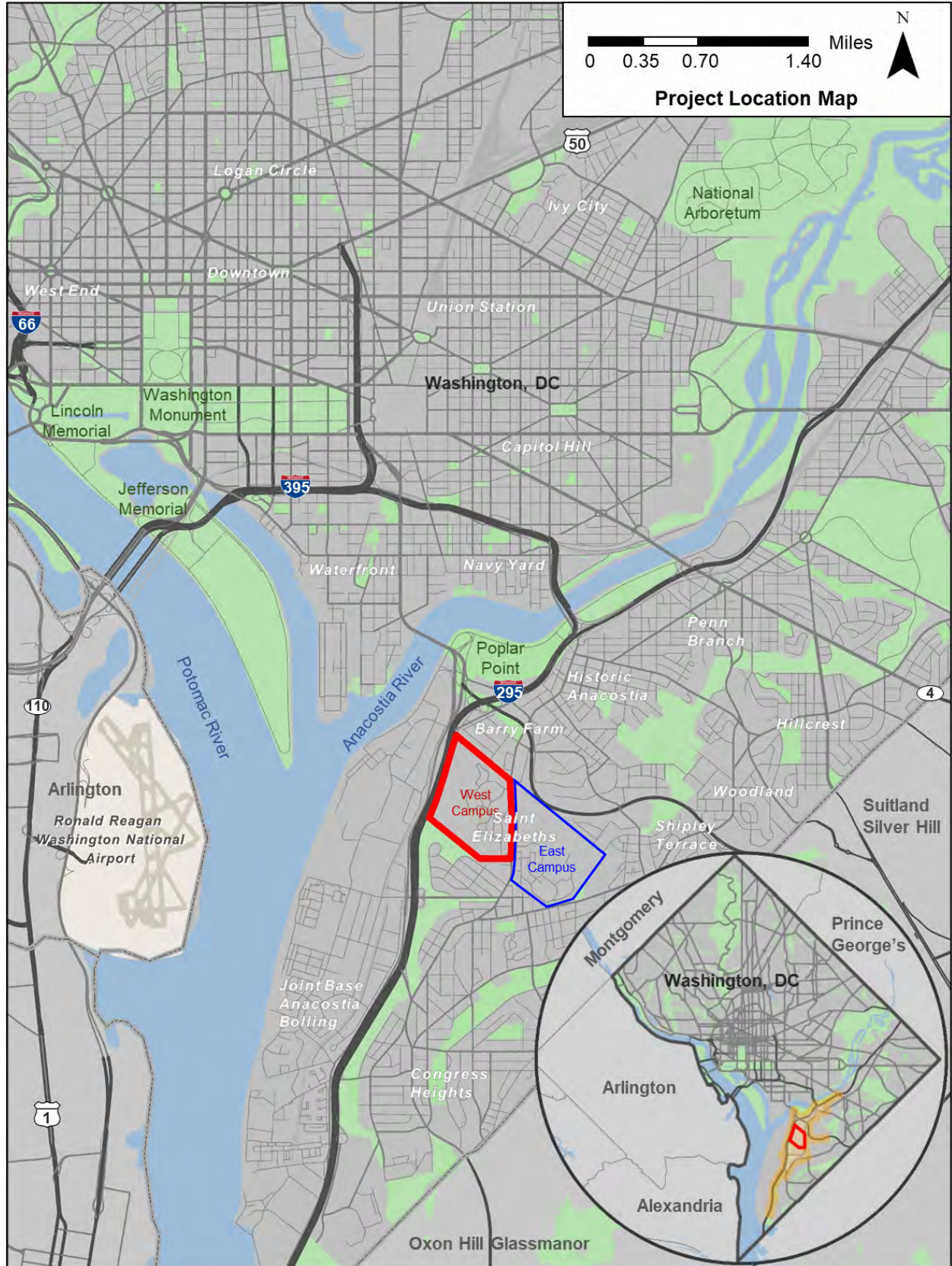


Figure 1: Project Location Map

Transportation improvements committed to in the Master Plan Amendment 1 and 2012 EIS include:

- Interchange modifications at Interstate 295 (I-295) interchange with Malcolm X Avenue SE – these improvements would connect direct ramps to the proposed West Campus Access Road (also known as St. Elizabeths Avenue) and would help separate local traffic from traffic associated with the DHS Headquarters. The interchange modifications would also eliminate existing unsafe weaving conditions on I-295 and reduce the number of merge points onto I-295 northbound.
- West Campus Access Road Construction – this three-lane road would run parallel to I-295 (to its east) between the Malcolm X Avenue SE interchange and Firth Sterling Avenue. This new road would connect to the proposed access modifications at Malcolm X Avenue SE and provide access to the West Campus portion of the DHS Headquarters consolidation.
- Firth Sterling Avenue/West Campus Access Road Intersection Improvements – these improvements will connect the West Campus Access Road with existing Firth Sterling Avenue and provide improvements and modifications to Firth Sterling Avenue and its side streets.
- Martin Luther King Jr. Avenue SE Improvements – these improvements would include two travel lanes in each direction, an additional turn lane, median, and sidewalks along Martin Luther King Jr. Avenue SE to mitigate traffic associated with DHS facilities and Gates 1 and 2 on the West Campus.

GSA is currently amending the 2009 DHS Consolidation Final Master Plan and the Master Plan Amendment 1 to more efficiently house DHS and its operating components on the West Campus. This would eliminate the need for the GSA to develop the East Campus North Parcel. The other key actions in Master Plan Amendment 2 that will change the previous Master Plan Amendment 1 are:

- Increase the number of seats on West Campus from 10,600 to 12,800
- Increase the West Campus building development from 3.8M gsf to 4.1M gsf.
- Update the Master Plan with a focus on the Plateau Area and Sweetgum Lane

### 1.3 Regulatory Setting

The procedural guidelines for assessing noise impacts associated with the construction and operation of highway improvements is codified in the DDOT Noise Policy (Effective Date: 11 July 2011). These procedures are based on the Federal Highway Administration's (FHWA) noise policy at Part 772 of Title 23 of the Code of Federal Regulations (23 CFR 772). Additionally, the District of Columbia Noise Control Act and its implementing regulations declared it a policy of the District of Columbia to reduce the ambient noise level in the District to promote public health, safety, welfare, and the peace and quiet of the inhabitants of the District.

### 1.4 Report Organization

This report documents an analysis of the potential noise consequences associated with Master Plan Amendment 2. The methodology used will examine whether there are any substantial changes between Master Plan Amendment 1 and Master Plan Amendment 2 that would affect the noise



environment. The analysis will focus on the elements that affect noise such as new noise-sensitive land uses, reconfiguration of roadways, changes in traffic, or the manner of the construction of the project. The report is organized as follows:

- **Section 2** discusses the background of Master Plan Amendment 2 and summarizes the noise evaluations conducted in 2008/2012.
- **Section 3** summarizes the analysis of the noise-sensitive land uses.
- **Section 4** examines the roadway configurations used in the 2012 EIS and compares it to the configuration associated with Master Plan Amendment 2.
- **Section 5** examines the traffic volumes/speeds/types used in the 2012 EIS and compares it to the inputs associated with Master Plan Amendment 2.
- **Section 6** examines the construction noise associated with the Preferred Alternative in the 2012 EIS and compares it to the construction noise associated with Master Plan Amendment 2.
- **Section 7** summarizes the conclusions of the study.

## 2 MASTER PLAN AMENDMENT 2, 2008/2012 NOISE ANALYSIS AND ANALYSIS METHODOLOGY

### 2.1 Major Elements of Master Plan Amendment 2

The key actions in this Master Plan Amendment 2 that would change the previous Master Plan Amendment 1 are:

- Eliminate the development of the North Parcel on the East Campus including buildings for 3,100 seats and a parking garage of 710 spaces.
- Increase the space utilization of West Campus including the following key actions:
  - Increase the number of seats on West Campus from 10,600 to 12,800
  - Increase the building development from 3.8M gsf to 4.1M gsf.
- Update the Master Plan with a focus on the Plateau Area and Sweetgum Lane.

The location of West Campus, the existing development site, and the proposed development plans are shown on **Figures 2a** and **2b**.

The elimination of the development within the North Parcel on the East Campus also eliminates the need for the associated internal roadway improvements, underground connection between the East and the West Campus and security checkpoints on the North Parcel. However, there is a new hospital planned for the North Parcel. The internal layout of the North Parcel is expected to change. The two intersections of Elm Street and Pecan Street with Martin Luther King Jr. Avenue SE will remain as proposed in the 2012 EIS.

Master Plan Amendment 2 evaluated two build alternatives. Because the only differences between Alternatives A and B are the building configurations on the West Campus, the construction and operational noise emissions are expected to be identical.





**St. Elizabeths West Campus Site**



**Figure 2a: Aerial and Master Plan**



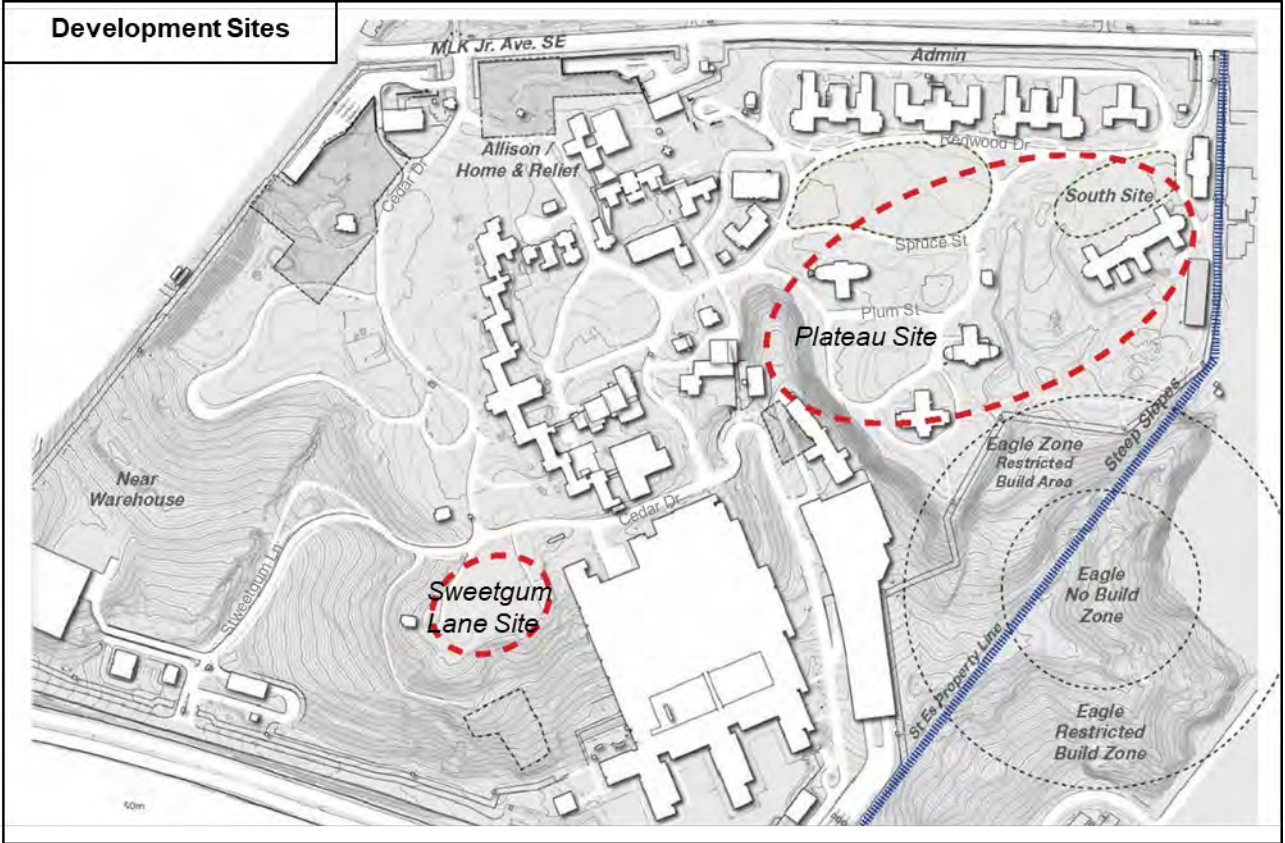


Figure 2b: Development Sites and Alternative B



## 2.2 No Action Alternative

The No Action Alternative associated with this analysis is the Preferred Alternative in the 2012 EIS. To determine if new noise impacts would result from Master Plan Amendment 2, this technical report compares Master Plan Amendment 2 to the 2012 EIS conditions including changes to the transportation network, volumes, speed, network operations and associated implications on changes to noise impacts.

## 2.3 Summary of Noise Analysis

This section summarizes the noise studies conducted for the project. For the purpose of traffic noise analysis, the use of a property adjacent to a transportation improvement is classified according to the human activities that occur or are expected to occur within the property boundaries. Noise abatement is considered when a traffic noise impact is predicted. Traffic noise impacts occur when the predicted existing or future highway traffic noise levels approach or exceed the noise abatement criteria (NAC), or when predicted existing or future highway traffic noise levels substantially exceed the existing highway traffic noise level, even though the predicted level may not exceed the NAC. The term “approach” is considered to be 1 decibels (dBA) less than the appropriate NAC. The NAC for residential land uses is 67 dBA.

### 2.3.1 2008 Noise Analysis

As part of the 2008 EIS, a noise analysis was produced for the West Campus. Noise-sensitive resources were identified, field measurements were made, and noise modeling was conducted. At the time, there were five Master Plan Alternatives (A – E) under consideration; each with three options for improving the Malcolm X Avenue/I-295 interchange. The 2008 EIS future condition for the noise modeling was established to be 2015. The report analyzed noise levels for all of the alternatives/options and concluded that noise was virtually identical (no more than a 1 dBA difference) among the alternatives. These 2008 EIS modeling results are summarized in **Table 1**, and the modeling locations are shown on **Figure 3**. These are representative locations along Malcolm X Avenue SE, Martin Luther King Jr. Avenue SE, and Firth Sterling Avenue/West Campus Access Road as well as a few receptors that may be affected by changes in land use on the East or West Campus.

**Table 1: Noise Level Modeling Results 2008 EIS Noise Analysis (dBA)**

Receptor Location	Existing (2008) Noise Levels	No-Build (2015) Noise Levels	Build (2015) Noise Levels
1 – Rowhomes - Malcolm X Avenue SE	66	68	70
2 – Rowhomes - Malcolm X Avenue SE	66	68	71
3 – Rowhomes - Malcolm X Avenue SE	50	53	55
4 – Rowhomes - Malcolm X Avenue SE	51	54	55
5 – Chapel – East Campus	51	52	56
6 – Rowhomes - Martin Luther King Jr. Avenue SE	67	69	70
7 – Multi-Family Residences – Barry Farm	59	59	60
8 – Barry Farm Recreation Center	70	70	71
9 – Multi-Family Residences – Barry Farm	66	68	70
10 – Cemetery – West Campus	68	71	73
11 – Multi-Family Residences – Second Street	55	57	58

The 2008 EIS reported that the alternatives would alter traffic patterns, increase traffic volumes, and result in several million square feet of new development. In comparison to FHWA’s NAC, the 2008 noise analysis concludes that none of the alternatives result in new noise impacts. The maximum increases associated with the West Campus Alternatives is 5 dBA over existing conditions. Most of the noise increases are much smaller (**Table 1**). Overall, the noise increases are described as imperceptible and negligible. Indirect and cumulative impacts are reported to be negligible. Unless otherwise noted, the traffic noise analysis utilizes an hourly equivalent sound level, Leq. This is the equivalent steady-state sound level which contains the same acoustic energy as the time-varying sound level during the same time period.

### 2.3.2 2012 Noise Analysis

Baseline noise measurements and a noise analysis were included in Appendix H of the 2012 EIS and summarized in the 2012 EIS. Existing noise levels were monitored at eight representative noise-sensitive receptors. The 2012 EIS’s alternatives were modeled to determine impacts. Overall, noise impacts associated with the 2012 EIS Preferred Alternative were described as “short- and long-term, **minor** and adverse” (emphasis added) under NEPA but not warranting a noise impact relative to the FHWA NAC. These are summarized in **Table 2**. The locations are shown on **Figure 3**.

**Table 2: Noise Level Modeling Results - 2012 EIS (dBA)**

Receptor Location	Existing (2012) Noise Levels	No-Build (2035) Noise Levels	Build (2035) Noise Levels
M-01 – I-295/Malcolm X Avenue SE	58	59	60
M-02 – I-295/Malcolm X Avenue SE	57	57	58
M-03 – West Campus (Gate 4)	48	49	50
M-04 – Multi-Family Residences – Barry Farm	65	65	65
M-05 – Multi-Family Residences – Barry Farm	64	64	64
M-06 – Multi-Family Residences – Barry Farm	53	53	54
M-07 – East Campus (North Parcel)	54	57	58
M-08 – East Campus (North Parcel)	49	48	48

The 2012 EIS concluded that the alternatives will result in no new traffic noise impacts and that the difference in noise levels is expected to be barely perceptible.

## 2.4 Analysis Methodology

To evaluate whether the conclusions reached in the 2012 EIS would be altered as a result of the changes associated with Master Plan Amendment 2, a qualitative analysis of the components of the noise analysis has been conducted. This includes a comparison of noise-sensitive land uses, roadway configurations, and vehicle volumes/speeds/types. If substantial differences were to result, a more detailed analysis would have to be performed. If no substantial changes are identified, the traffic noise environment can be said to be unaffected, or minimally affected, by Master Plan Amendment 2. Additionally, changes in operational and construction noise are assessed in the following report.



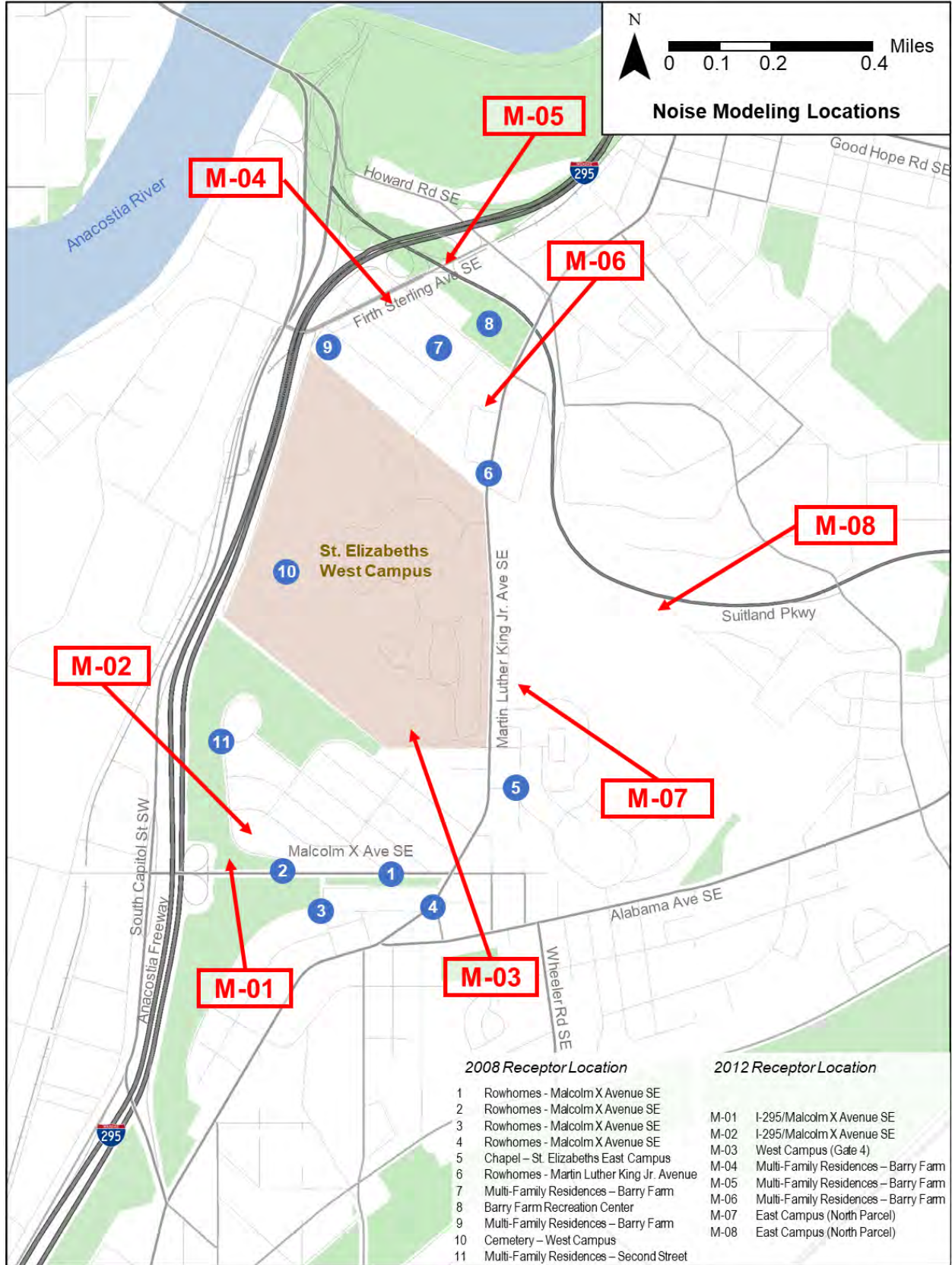


Figure 3: Noise Modeling Locations – 2008 EIS and 2012 EIS

## 3 ANALYSIS OF NOISE-SENSITIVE RECEPTORS

This section investigates the noise-sensitive land uses used in previous noise studies. It then identifies any new or modified noise-sensitive land uses that are now part of the project Study Area to determine if there are any additional impacts on noise-sensitive land uses.

### 3.1 Summary of EIS Noise-Sensitive Land Uses (2008 and 2012)

The noise analysis presented in the 2012 EIS organized the noise-sensitive land uses into three areas:

1. North Parcel<sup>1</sup> - the Northern Portion of the East Campus
2. I-295/Malcolm X Avenue SE interchange
3. Firth Sterling Avenue and West Campus Access Road

The 2012 EIS Noise Analysis focused on the sensitive receptors potentially affected by the original Master Plan. The 2008 noise analysis is also referenced in this section, for background, when results were available for the areas in the vicinity of the receptors identified in the 2012 EIS.

#### 3.1.1 North Parcel – the Northern Portion of the St. Elizabeths East Campus

The North Parcel refers to the northern portion of the East Campus. This is the portion of the East Campus directly across from Gate 2 on the West Campus. The most prominent feature is the Dorothea Dix building, a 12-story building that most recently was used for construction staging and as a homeless shelter. Other buildings include the St. Elizabeths Chapel, Smith Center, and Burn Laboratory. These buildings are also largely unused. The only audible traffic noise comes from Martin Luther King Jr. Avenue SE and Suitland Parkway. Unlike the West Campus, which has a 10-foot stone wall, the East Campus has an open fence.

Within North Parcel, noise levels are low. A limited amount of city noises affects the North Parcel (aircraft, emergency vehicles, sirens). Noise generated within the North Parcel is low which is confirmed by noise monitoring and modeling.

- In the 2008 EIS, modeling site #5 was located in the North Parcel at the St. Elizabeths Chapel. Existing noise levels were predicted to be 51 dBA; the 2015 No-Build noise levels were predicted to be 52 dBA; and 2015 Build noise levels were predicted to be 56 dBA.
- In Appendix H of the 2012 EIS, a total of 10 monitoring locations were investigated. Only immediately adjacent to Martin Luther King Jr. Avenue SE (site #1 – just off the sidewalk), do noise levels approach the FHWA Noise Abatement Criteria (no traffic noise impact). Most of the readings (7 of 10) were below 60 dBA.
- In the 2012 EIS, modeling sites M-07 and M-08 were located in the North Parcel. The existing average noise level was predicted to be 51 dBA; the average design year (2035) No-Build noise level was predicted to be 53 dBA; and the average design year (2035) Build noise level was predicted to be 53 dBA.

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<sup>1</sup> The 2012 EIS included the land uses along Martin Luther King Jr. Avenue SE as part of its discussion of the North Parcel.



Both the 2008 and 2012 EISs determined these noise projections did not require mitigation.

### 3.1.2 I-295/Malcolm X Avenue SE Interchange

This area consists of the Congress Heights neighborhoods east of the intersection of I-295 and Malcolm X Avenue SE. The nearest residence to the intersection is a three-story apartment building at 2952 2nd Street SE. Across the street is a picnic area with a horseshoe pit. There are large swaths of forested areas (Shepherd Parkway) between most of the residences and the roadways. However, there are residences along Malcolm X Avenue.

The 2012 EIS (Appendix H) describes the soundscape as “not generally quiet.” Bird song is audible but masked by the background sound from I-295 and/or Malcolm X Avenue. Noise monitoring and noise modeling cover both areas:

- In Appendix H of the 2012 EIS, noise monitoring occurred at 2952 2nd Street SE. Noise levels varied between 59 to 61 dBA.
- In the 2008 EIS, similar areas were modeled as the 2012 EIS. Modeling sites # 1–4 were along Malcolm X Avenue SE (Monitoring Sites #s 1 and 2 are first-row receptors<sup>2</sup> and Monitoring Sites #s 3 and 4 are second-row receptors). First-row existing noise levels were predicted to be 66 dBA (second row 51 dBA). First-row 2015 No-Build noise levels were predicted to be 68 dBA (second row 53 dBA). First-row 2015 Build noise levels were predicted to be 71 dBA (second row 55 dBA).
- In the 2008 EIS, modeling site # 11 was located at 2nd Street. Existing noise levels were predicted to be 55 dBA; 2015 No-Build noise levels were predicted to be 57 dBA; and 2015 Build noise levels were predicted to be 58 dBA.
- In the 2012 EIS, modeling sites M-01 and M-02 were at 2nd Street. The existing average noise level was predicted to be 58 dBA; the average design year (2035) No-Build noise levels was predicted to be 59 dBA; and the average design year (2035). Build noise level was predicted to be 59 dBA.

Both the 2008 and 2012 EISs determined these noise projections did not require mitigation.

### 3.1.3 Firth Sterling Avenue and West Campus Access Road

This area encompasses the Barry Farm, Park Chester, and Wade Road communities to the north of the West Campus – an area parallel to, and between, I-295 and Martin Luther King Jr. Avenue SE. Currently, this area is predominantly a neighborhood of town homes (two-story homes grouped into blocks of eight conjoined residences). Noise impacts come primarily from traffic using the Firth Sterling access road. Nevertheless, the traffic environment is dominated by I-295, masking the traffic (largely trucks) that utilize the access road.

Noise monitoring and noise modeling within this area includes the following:

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<sup>2</sup> First row receptors are immediately adjacent to the traffic noise generating roadway. Second row receptors are shielded from the roadway by the first row.

- In the 2008 EIS, modeling sites #6-9 were located in this area (**Figure 3**). Existing noise levels were predicted to range between 59 to 70 dBA. The 2015 No-Build noise levels are predicted to be approximately 1 dBA higher than the existing levels. The 2015 Build noise levels are predicted to be approximately 3 dBA higher than the No-Build levels.
- In Appendix H of the 2012 EIS, noise monitoring was conducted at five locations. Four of the monitoring locations were along Firth Sterling Avenue. Noise levels varied between 67 and 73 dBA. The fifth monitoring location was at the intersection of Eaton Road and Wade Avenue. The measured noise level at this location was 59 dBA.
- In the 2012 EIS, modeling sites M-04 to M-06 were located in this area. The noise levels vary by location. No noise levels approach the FHWA NAC (no traffic noise impact). The variation between the conditions (existing/No-Build/Build) is negligible (**Table 2**).

Both the 2008 and 2012 EISs determined these noise projections did not require mitigation.

### 3.2 Review of New Noise-Sensitive Land Uses (2019)

A site review was conducted to evaluate the noise-sensitive land uses potentially affected by Master Plan Amendment 2. The following new or modified noise-sensitive land uses were developed since the 2012 EIS/Master Plan:

- **Gateway DC** is an open-air and covered pavilion located within the East Campus, at 2700 Martin Luther King Jr. Avenue SE, opposite Milwaukee Place and West Campus Gate 3 (the southernmost portion of the West Campus) (see <http://eventsdc.com/Venues/Gateway-DC.aspx>). This venue includes a 400-foot-long facility featuring 16,300 square feet of space for vendors and 3,100 square feet of enclosed space. The building is roughly 200 feet from Martin Luther King Jr. Avenue SE. Activities at the site include cultural, artistic, musical programs, festivals, and a farmers' market – activities that are not dependent on a quiet atmosphere. **The R.I.S.E. Demonstration Center** is located at the site of the St. Elizabeths Chapel, just south of Gateway DC. The address is 2730 Martin Luther King Jr. Avenue SE (see <http://stelizabethseast.com/rise-dc/>). This facility is located on the East Campus of St. Elizabeths (roughly 170 feet from Martin Luther King Jr. Avenue SE). The R.I.S.E. (Relate, Innovate, Stimulate, and Elevate) Demonstration Center connects the innovation economy, the surrounding communities and residents of Washington, DC, until the development of a permanent East Innovation Hub can be constructed. Outdoor activities seem to be rare and not dependent on a quiet atmosphere. However, the 2008 EIS utilized the St. Elizabeths Chapel as a modeling point (Site M5 on **Figure 3**). No traffic noise impacts were predicted at this location during the 2008 noise analysis. **Friendship Technology Preparatory Academy (Tech Prep)** is a college preparatory middle and high school (620 Milwaukee Place SE). Tech Prep is immediately adjacent to the West Campus (see [www.friendshipschools.org](http://www.friendshipschools.org)). It opened in 2009 and focuses on science, technology, engineering, and math. Another building is under construction at 2705 Martin Luther King Jr. Avenue SE. The new building is across the street from Gateway DC, with the building immediately adjacent to the sidewalk, along Martin Luther King Jr. Avenue SE. Outdoor spaces are limited and seemingly in flux as the facilities are being developed. While in place for the 2012 EIS, Tech Prep was not referenced. No activities dependent on a quiet atmosphere are present, and no noise impacts are expected.



**Unified Communications Center (UCC)** is a state-of-the-art call center for the District of Columbia (see <https://ouc.dc.gov/>). The UCC opened on September 25, 2006, and is on the East Campus. While in place for both the 2008 and 2012 EISs, UCC was referenced in neither document. The UCC receives and processes calls to 911 and the District's customer service line. During major emergencies, the center becomes the District's Emergency Operations Center (Mayor's Command Center) and provides a central location for multiple agencies. Located at 2720 Martin Luther King Jr. Avenue SE, the UCC's southern entry point is at the Rosewood Street intersection with the West Campus (Gate 2). All outdoor spaces of frequent human use are located behind the building, several hundred feet from Martin Luther King Jr. Avenue SE. No activities dependent on a quiet atmosphere are present, and no noise impacts are expected. These sites are shown on **Figure 4**.

- Entertainment and Sports Arena (ESA) is parcels 9 and 12 of the *Elizabeths East Campus – Parking Master Plan Study* (2017) (see <https://esaontherise.com> and **Figure 5**). The venue is a 4,200 seat venue for the Washington Mystics. It also includes related support areas. Currently, there are 75 annual events with up to 22 events requiring parking for sold out venues. It opened in 2016.



Figure 4: Location of 2019 Noise-Sensitive Land Uses



### 3.3 Future Land Uses

According to the *St. Elizabeths East Campus – Parking Master Plan Study* (2017), future land uses were identified (**Figure 5**). The East Campus was segmented into 17 parcels. The current/proposed East Campus development is as follows:

- 252 apartments on CT Campus with adaptive reuse of the 7 historic buildings on parcel 11. Up to 84 onsite parking spaces being provided by the developer.
- Up to 120 townhomes on parcels 10 and 14 with parking provided in garages or driveways (off-street) for all units.
- Parcel 17 being developed with 171,000 square feet (SF) of office space and 30,000 SF assumed for retail. Some 140 parking spaces are slated to be developed on this site by the developer. The District has the option to fund an additional 140 spaces on this parcel when it's developed.

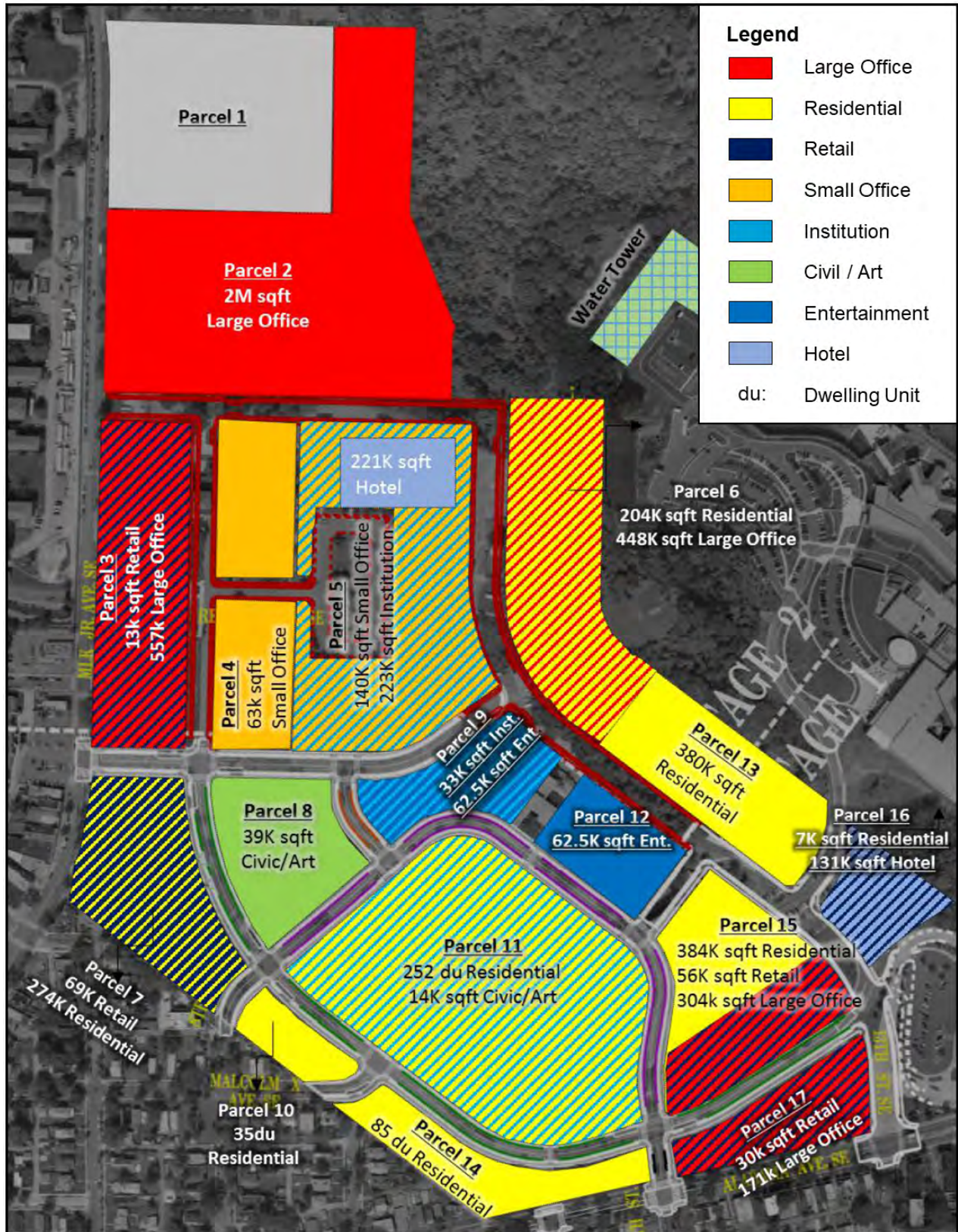


Figure 5: Planned East Campus Development



### 3.4 Evaluation of Noise-Sensitive Land-Use Changes

Existing Land uses within the project area have only modestly changed since the noise evaluations conducted during the 2008 EIS and 2012 EIS. Among the new land uses, no activities dependent on a quiet atmosphere are present, and no additional noise impacts are expected.

Land Use planning with the project area have also only modestly changed since the noise evaluations conducted during the 2008 EIS and 2012 EIS. The 2012 EIS references the 2006 Comprehensive Plan for the National Capital, hereafter referred to as the “Comprehensive Plan,” is a statement of principles, goals, and planning policies for the growth and development of the national capital for the next 20 years. The East Campus is within the “Far Southeast/Southwest Area Element.” The Far Southeast/Southwest Area Element outlines general policies and actions that should guide growth and neighborhood conservation decisions. Policy FSS-2.2.1 in the Comprehensive Plan states that redevelopment of the East Campus as a new community should occur with mixed land uses, including mixed-density housing, retail shops, offices, a comprehensive mental health care facility, and parks and open space. Other uses, such as a satellite college campus, civic uses, and local public facilities should be incorporated into redevelopment plans (DCOP, 2006a). This is an apt description for the development proposed in the current planning.

## 4 ANALYSIS OF ROADWAY CONFIGURATION

This section compares the roadway configuration used in the 2012 EIS noise analysis with the roadway configuration proposed for Master Plan Amendment 2. The changes were examined to determine if noise impacts might change from those presented in the 2012 EIS. This analysis uses the transportation projections for 2035, which has been determined to be the foreseeable project horizon.

### 4.1 Summary of Roadway Configuration in the 2012 EIS

The 2012 EIS's Preferred Alternative for the improvement of the I-295/Malcolm X Avenue SE interchange is Alternative 2 Modified and for the improvement of Martin Luther King Jr. Avenue SE is Alternative 1.

- **I-295/Malcolm X Avenue SE Interchange Improvements (Alternative 2 Modified) (Figure 6)** would allow for an improved 3-lane connection on the eastern side of I-295 from the interchange north through the Shepherd Parkway to the proposed West Campus Access Road on the western side of the St. Elizabeths Campus. Master Plan Amendment 2 would not change these roadway configurations.
- **West Campus Access Road Improvements** result in a 3-lane road running parallel to I-295 to its east between the Malcolm X Avenue SE interchange and Firth Sterling Avenue. The Firth Sterling Avenue/West Campus Access Road intersection has been improved, and a road between Firth Sterling and Gate 4 has been constructed. The balance of the access road that will connect from Gate 4 to the proposed access modifications at the I-295/Malcolm X Avenue SE interchange will be constructed as part of the I-295/Malcolm X Avenue SE Interchange Improvements project noted above (**Figure 6**).
- **Martin Luther King Jr. Avenue SE (Alternative 1) Improvements** would involve widening to allow for a 79-foot right-of-way for the roadway along the St. Elizabeths Campus. South of the St. Elizabeths Campus, the new alignment of Martin Luther King Jr. Avenue SE in Congress Heights would consist of 99 feet of roadway and sidewalks. Improvements to the roadway would include two lanes in each direction, an additional turn lane, median, and sidewalks along Martin Luther King Jr. Avenue SE (Alternative 1) Improvements (**Figure 7**). There are no meaningful differences that would affect the traffic noise environment.





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Figure 6: I-295/Malcolm X Avenue SE Interchange Alternative 2 Modified (Source - 2012 EIS)





Figure 7: Martin Luther King Jr. Avenue SE Improvements (Source - 2012 EIS)

## 4.2 Review of Roadway Configuration/Land-Use Assumptions in Master Plan Amendment 2

Master Plan Amendment 2 includes changes to the transportation infrastructure due to the additional parking required on the West Campus. These new transportation improvements could affect the noise environment. Additionally, Master Plan Amendment 2 includes updates to the land-use assumptions that were used to assess impacts in the 2012 EIS. These changes could also potentially affect the noise environment.

### 4.2.1 Roadway Configuration Changes Associated with the Master Plan Amendment 2

As a result of an updated traffic analysis, additional transportation improvements were developed to support Master Plan Amendment 2 and mitigate impacts. These include the following:

- A 3-lane reversible or 4-lane roadway within the West Campus between Gate 1 and the security gates for the Gate 1 garage
- Lane configuration improvements, signal phasing changes, and signal timing changes at the intersection of Gate 1 and Martin Luther King Jr. Avenue SE.
- The addition of a protected turn phase for northbound left turns at the intersection of Sumner Road and Martin Luther King Jr. Avenue SE.
- The relocation of the proposed Pecan Street/Congress Heights Metrorail Station shuttle; the shuttle will support the transit mode share goals for the West Campus.

### 4.2.2 Transportation/Land-Use Assumptions Associated with Master Plan Amendment 2

In addition to the new/modified roadway configurations, Master Plan Amendment 2 has the potential to alter the noise environment through the transportation and land-use assumptions associated with Master Plan Amendment 2. Changes of this type have the potential to affect noise levels in different areas and need to be analyzed against the conditions assumed in the 2012 EIS.

**Table 3** summarizes major assumptions regarding land use and transportation improvements under the Master Plan Amendment 2. The evaluation year for the study is 2035. For comparison, the table includes the 2012 EIS assumptions as well.



**Table 3: Recommended Transportation and Land-Use Assumptions for Master Plan Amendment 2  
Transportation Analysis (Model Year 2035)**

Transportation or Land Use Improvement	2012 EIS Assumption	Current Status	Assumption made for Master Plan Amendment 2 2035 Analysis Year
<b>Transportation Improvements to be completed by Other Agencies</b>			
DC Streetcar – Anacostia Initial Segment (DDOT)	Complete by West Campus design year (2035)	Construction occurred in 2009 and 2010, but the project was abandoned before the line was complete due to financial concerns.	Exclude from 2035 Analysis Year as DDOT requested to remove this project from the Visualize 2045 and the latest FY2019-2024 TIP.
DC Streetcar – Anacostia Extension (DDOT)	Complete by West Campus design year (2035)	Construction occurred in 2009 and 2010, but the project was abandoned before the line was complete due to financial concerns.	Exclude from 2035 Analysis Year as DDOT requested to remove this project from the Visualize 2045 and the latest FY2019-2024 TIP.
Purple Line Transitway (MDOT/MTA)	Not included	Under construction	Included in 2035 Analysis Year
South Capitol Street Bridge Project (DDOT)	Complete by West Campus design year (2035)	A revised Preferred Alternative was developed as part of the South Capitol Street Supplemental EIS.	Include the Revised Preferred Alternative in 2035 Analysis Year. Revise models to match the Revised Preferred Alternative configuration.
East Campus Roadway Network (DDOT/DMPED)	Complete by West Campus design year (2035)	Only Stage 1 streets (Cypress Street and south) are constructed.	Include full build out East Campus network in 2035 Analysis Year.
<b>Local and Regional Transportation Improvements - Highway</b>			
Martin Luther King Jr. Avenue SE Improvements	Complete by West Campus design year (2035)	No change	No change in Baseline. Refinements possible based on 2035 analysis.
Firth Sterling Avenue Improvements	Complete by West Campus design year (2035)	Currently complete	No change
West Campus Access Road (St. Elizabeths Avenue)	Complete by West Campus design year (2035)	Gate 4 to Firth Sterling Avenue is complete; the section between Gate-4 and Malcolm X interchange will be complete by 2035.	No change
I-295/Malcolm X Avenue SE Interchange	Complete by West Campus design year (2035)	No change	No change
Construction/widening I-95/I-495 Toll Lanes (MDOT/State Highway Administration/Maryland Transportation Authority)	Not included	The project is under consideration. For air quality conformity modeling purposes, Visualize 2045 assumed 2025 completion date.	Included in 2035 Analysis Year

**Table 3: Recommended Transportation and Land-Use Assumptions for Master Plan Amendment 2 Transportation Analysis (Model Year 2035)**

Transportation or Land Use Improvement	2012 EIS Assumption	Current Status	Assumption made for Master Plan Amendment 2 2035 Analysis Year
Construction/widening I-270 Toll Lanes (MDOT/State Highway Administration/Maryland Transportation Authority)	Not included	The project is under consideration. For air quality conformity modeling purposes, Visualize 2045 assumed 2025 completion date.	Included in 2035 Analysis Year
I-66 Inside the Beltway Tolling (VDOT)	Not included	Tolling on I-66 lanes inside the Beltway initiated; Currently HOV-2+ ride for free; After 2021, it will be changed to HOV-3+.	Included in 2035 Analysis Year
I-66 Outside the Beltway Managed/Express Lanes (VDOT)	Not included	Currently under construction with operational by 2021/2022.	Included in 2035 Analysis Year
<b>Land Use</b>			
East Campus Master Plan (DDOT/DMPED)	Complete by West Campus opening year (2020) Office: 1.8 million SF Residential: 1,300 units Retail: 206,000 SF Hospitality: 330,000 SF Civic & Educational 250,000 SF	Various redevelopment options under consideration.	Sources: East Campus Parking Master Plan, June 2017 and DMPED/East Campus Team Office: 1.68 million SF Residential: 1,621 units Retail: 168,000 SF Hospitality: 352,000 SF Concert/Entertainment: 5,000 seats Civic/Art/Institutional: 310,000 SF
Campus North Parcel	FEMA Headquarters complete by 2020 750,000 SF of development 3,100 seats/employees 775 parking spaces	FEMA Headquarters no longer on the East Campus. Transit component provided by Pecan Street bus bays will be retained but specific location has not yet been identified by the East Campus redevelopment team.	150-bed new Hospital with 230,000 SF Ambulatory Services Relocation of 801 Men's Shelter (380-bed low-barrier shelter) Retain transit component provided by Pecan Street bus bays
West Campus	3,750,000 SF of development 10,900 seats/employees 3,459 parking spaces	4,200,000 SF of development 12,800 seats Up to 14,500 personnel assigned 4,058 parking spaces	Assume 12,800 seats (for worker arrival calculations) and 14,500 employees (to scale daily non-Home Based and visitor trips) in 2035 Analysis Year.
Background Land-Use Forecasts and Travel Demand Model Version	Travel Demand Model: Version 2.2 Land-Use Forecasts: MWCOG Round 7.2A for Draft EIS and later updated to with Round 8.0 for 2012 EIS for 2,191 TAZs	Travel Demand Model: Version 2.3 Land-Use Forecasts: MWCOG Round 9.1 for 3,722 TAZs	Retain Version 2.2 model Land-Use Forecasts: Convert Round 9.1 data for 3,722 TAZs to Round 9.1 for 2,191 TAZs using conversion methodology provided by MWCOG



**Table 3: Recommended Transportation and Land-Use Assumptions for Master Plan Amendment 2 Transportation Analysis (Model Year 2035)**

Transportation or Land Use Improvement	2012 EIS Assumption	Current Status	Assumption made for Master Plan Amendment 2 2035 Analysis Year
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DDOT – District Department of Transportation  
 DMPED – Office of the Deputy Mayor for Planning and Economic Development  
 FEMA – Federal Emergency Management Agency  
 MDOT – Maryland Department of Transportation  
 MTA – Maryland Transit Administration  
 MWCOG – Metropolitan Washington Council of Governments  
 SF – square feet  
 VDOT – Virginia Department of Transportation  
 TAZ – Traffic Analysis Zone  
 EIS – Environmental Impact Statement

### 4.3 Evaluation of Roadway Configuration Changes

As described above, the changes associated with Master Plan Amendment 2 are minor and are not expected to materially change the roadway configuration in the vicinity of the noise-sensitive land uses. Consequently, Master Plan Amendment 2 will not affect the noise environment. The changes are evaluated below:

- At Gate 1 more users are predicted. Modifications would be needed to the Gate 1 garage design so that traffic exiting the garage in the PM peak hour does not queue back into the garage. Since there are no noise-sensitive land uses in this area, changes to the operations at this gate would not result in noise impacts.
- Master Plan Amendment 2 would add a protected turn phase for northbound left turns at the intersection of Sumner Road and Martin Luther King Jr. Avenue SE. The change in lane configuration does not result in traffic moving closer to sensitive receptors, therefore an increase in noise due to the roadway reconfiguration would not occur.
- While the preferred shuttle option from the Congress Heights Metro Station to the east side of the West Campus has not been selected, the project is expected to support the effectiveness of transit for users. Regardless of the preferred alternative, the impact to traffic noise is expected to be minimal. The change is expected to mostly affect the DC Gateway Pavilion in the East Campus (on the proposed Sycamore Drive). The uses at the DC Gateway are not dependent on a quiet atmosphere. There are no other sensitive receptors near this area.

Therefore, the proposed transportation changes and lack of changes on noise-sensitive land use for Master Plan Amendment 2’s transportation analysis would not result in additional noise impacts.

## 5 ANALYSIS OF TRAFFIC NOISE INPUTS – VEHICLE VOLUMES, SPEEDS AND TYPES

The type and total number of vehicles along with their speeds affect traffic noise levels. This section evaluates whether Master Plan Amendment 2 changes in traffic flow would change the noise results from the noise analysis in the 2012 EIS.

### 5.1 Summary of Traffic Used in the 2012 EIS

The traffic inputs used in the noise analysis were based on data provided in the St. Elizabeths Transportation Technical Report (TTR). The TTR Study Area, referred to as the Interstate Access Approval Impact Area, encompasses a total of 46 intersections and freeway segments in the vicinity of the St. Elizabeths Campus. The Study Area analyzed in the 2012 EIS is referred to as the EIS Transportation Analysis Study Area. The 2012 EIS Transportation Analysis Study Area only includes intersections and freeway segments directly impacted by the DHS Headquarters Consolidation at St. Elizabeths. This Study Area is generally bounded by the Fredrick Douglass Memorial Bridge to the north, the Martin Luther King Jr. Avenue SE intersection with South Capitol Street to the south, I-295 to the west, and the Alabama Avenue/Stanton Road intersection to the east (**Figure 8**). The roadways in the vicinity of the West Campus include:

- **Malcolm X Avenue SE** is generally a 4-lane, urban, minor arterial that runs east-west and extends from South Capitol Street and the Joint Base Anacostia-Bolling main gate to 8th Street. East of Martin Luther King Jr. Avenue SE, Malcolm X Avenue SE transitions from a minor arterial to a collector between Martin Luther King Jr. Avenue SE and 8th Street and transitions to a local street from 8th Street, to the East Campus perimeter (where the road terminates). Malcolm X Avenue SE is wider west of Martin Luther King Jr. Avenue SE and narrows east of Martin Luther King Jr. Avenue SE. The roadway operates as a 2-lane road with permitted parking on both sides of the street between the I-295 northbound on-/off-ramps and Martin Luther King Jr. Avenue SE. The speed limit along Malcolm X Avenue SE is 30 mph.
- **Suitland Parkway** is a limited-access freeway that generally runs east-west between South Capitol Street and Andrews Air Force Base in Prince George's County, Maryland. Its cross section varies from four lanes east of I-295 to six lanes west of I-295. It is classified as an expressway through the Study Area and carries mostly commuter traffic. The speed limit on Suitland Parkway is 45 mph within the 2012 EIS Transportation Analysis Study Area.
- **Martin Luther King Jr. Avenue SE** is a 4-lane, urban, minor arterial that runs north-south from the 11th Street Bridge to the District of Columbia Village in the southeast District of Columbia. The speed limit is 30 mph within the Study Area. Parking is permitted on either side of the street north and south of the St. Elizabeths Campus. Adjacent to the campus, parking is prohibited along the northbound side of the street during the morning peak periods and along the southbound side of the street during the evening peak periods.
- **Firth Sterling Avenue** is a 4-lane collector road that runs southwest to northeast from South Capitol Street to I-295 northbound on-ramp. Firth Sterling Avenue provides access for motorists and pedestrians traveling between Joint Base Anacostia-Bolling, the Anacostia Metrorail Station, and Historic Anacostia. It also provides access to the West Campus and the Barry Farm neighborhood. The speed limit for Firth Sterling Avenue is 25 mph.



The characteristics for these roadways are summarized in **Table 4**.

**Table 4: 2012 EIS Roadway Classification and Characteristics**

Roadway	Classification	Number of Lanes	Speed Limit	On-Street Parking	Average Daily Traffic Volumes
Martin Luther King Jr. Avenue SE	Minor Arterial	4	30	Yes	19,600
Alabama Avenue	Minor Arterial	4	25	Yes	14,200
South Capitol Street	Expressway/Minor Arterial	4–5	35–40	No	16,900
I-295	Interstate	5–6	50	No	85,100
Malcolm X Avenue SE	Minor Arterial	2–4	30	Yes	12,200
Wheeler Road	Minor Arterial	2–4	25	Yes	11,100
Suitland Parkway	Freeway	4–6	45	No	44,200
Howard Road	Collector	4	25	No	9,200
Firth Sterling Avenue	Collector	2–4	25	No	10,100
Stanton Road	Collector	2	25	Yes	10,400
11th Place	Local	2	25	Yes	----
13th Street	Local	2	25	Yes	----

Sources: DDOT, 2009e; USDOT and DDOT, 2011

Direct access to both the East Campus and West Campus is provided along Martin Luther King Jr. Avenue SE. Gate 1 is the northernmost access to the West Campus directly across from the northern access to the UCC. This northern UCC access is currently inactive. Gate 2 provides access to the West Campus and is also directly across from the main entrance to the UCC, also known as Pine Street. This intersection is currently not signalized. Gate 3 is an inactive gate along the eastern side of Martin Luther King Jr. Avenue SE, located near Pecan Street, south of Gate 2. Gate 3 is currently closed but previously provided access to the West Campus. There is also a below-grade tunnel south of Gate 3 that connects the East Campus and West Campus.

The TTR used two traffic operation software packages to predict future conditions. VISSIM was used as the primary analysis tool to determine intersection level of service (LOS) and delay, arterial travel times, and freeway LOS and densities. Synchro was used as a traffic data information database and the basis for future-year signal timing and optimization.

The 2012 EIS presented the traffic environment in terms of a freeway capacity analysis and an intersection LOS analysis. The intersection analysis in the 2012 EIS presents the LOS in the standard A through F sequence. It also presents the delay through the intersection in seconds per vehicle. Data from a total of 34 intersections are presented in the 2012 EIS. This wide-ranging dataset was chosen as the template for assessing the impact of Master Plan Amendment 2. The Master Plan Amendment 2 analysis will focus on whether the traffic conditions shown in the 2012 EIS would be materially different from the traffic under Master Plan Amendment 2 and, consequently, might alter the traffic noise environment.



Figure 8: 2012 EIS Transportation Analysis Study Area (Source: 2012 EIS)





## 5.2 Evaluation of Traffic Differences

A revised baseline analysis of the traffic and transit operations associated with St. Elizabeths was conducted to examine the traffic conditions associated with Master Plan Amendment 2. The analysis was based on operational modeling, using the original traffic models (VISSIM models) associated with the 2012 EIS and Master Plan Amendment as a base, and modifying the models to reflect the updated conditions associated with Master Plan Amendment 2. Following the completion of the baseline analysis scenario, an evaluation of critical transportation infrastructure/operations gaps was conducted and solutions developed. This work resulted in the roadway configuration presented in **Section 4.2.1**.

The traffic evaluation had several components:

- An evaluation of intersection operation
- An evaluation of roadway metrics
- A evaluation of arterial operation

### 5.2.1 Intersection Operation

The traffic conditions associated with Master Plan Amendment 2 utilized the same metrics presented in the 2012 EIS (e.g., freeway capacity and intersection LOS/delay). Over 50 intersections were investigated in the Master Plan Amendment 2 traffic analysis. These intersections also have data from the 2012 EIS. These were used to determine if Master Plan Amendment 2 varied substantially in traffic operations.

The analysis identified delays, LOS and throughput at the intersections. **Table 5** summarizes the relationship between LOS and delay. This report will focus on changes in intersection LOS. Further, the analysis identified “Significant” negative impacts. That is defined as degradation of two LOS levels that results in a congested LOS (E/F), from the conditions presented in the 2012 EIS. For positive impacts, significant was defined as improvements of two LOS levels.

**Table 5: Master Plan Amendment 2 Traffic Analysis - Intersections**

LOS	Congestion Level	Signalized	Unsignalized
		Average Delay (sec/veh)	
A	Light Traffic	<=10	<=10
B		>10-20	>10-15
C		>20-35	>15-25
D	Moderate Traffic	>35-55	>25-35
E	Heavily Congested Traffic	>55-80	>35-50
F	Severely Congested Traffic	>80	>50

**Tables 6a and 6b** shows the LOS data for both the 2012 EIS and Master Plan Amendment 2 and the differences between them. These tables use the Highway Capacity Manual LOS A-F along with a four-color scheme to represent congestion levels. Significant changes are shown in **Bold**.



During the PM Peak Hour (**Table 6a**), LOS at 13 intersections are expected to be poorer under the conditions modeled for Master Plan Amendment 2. Twenty intersections are expected to improve. A plurality (21) show no change. Four intersections are expected to be significantly degraded and seven are expected to be significantly improved.

During the AM Peak Hour (**Table 6b**), LOS at 21 intersections are expected to be poorer under the conditions modeled for Master Plan Amendment 2. Eighteen intersections are expected to improve. Fourteen show no change. Six intersections are expected to be significantly degraded and 11 are expected to be significantly improved.

Overall, intersection operation is expected to modestly improve. This improvement is expected to have a minimal impact on overall noise levels. This is because the potential increases in speed or volume through the intersection would be counterbalanced with the area's low speed limits and the reduced noise from less frequent starting and stopping. Also, small changes in traffic volumes in residential intersections can result in disproportionately large changes in LOS. This small change in traffic is not expected to change noise levels. A general rule of thumb is that a doubling of traffic results in a 3 dBA change in traffic noise.





Table 6a: Comparison of PM Intersection Level of Service – EIS and Master Plan Amendment 2

PM Peak Hour Intersection LOS			PM Peak Hour		
Corridor	ID	Intersection Name	2035 Alt 2 Modified (2012 Study)	2035 Future Baseline	2035 Alt 2 Modified vs. 2035 Future
			LOS	LOS	Outcome
Martin Luther King Jr. Avenue	202	11th Street Bridge and I-295 SB On-Ramp	D	A	Improve
	201	Martin Luther King Jr. Avenue/11th Street Bridge and I-295 NB Off-Ramp	F	E	Improve
	1	Martin Luther King Jr. Avenue and Good Hope Road	F	E	Improve
	3	Martin Luther King Jr. Avenue and W Street	F	C	Improve
	4	Martin Luther King Jr. Avenue and Pleasant Street/Maple View Place	F	E	Improve
	6	Martin Luther King Jr. Avenue and Morris Road	D	C	Improve
	7	Martin Luther King Jr. Avenue and Talbert Street	C	C	No Change
	11	Martin Luther King Jr. Avenue and Howard Road/Sheridan Road	D	D	No Change
	125	MLK Jr. Ave and Suitland Pkwy Diamond Interchange	C	C	No Change
	17	Martin Luther King Jr. Avenue and Sumner Road/Stanton Road	C	D	Degrade
	19	Martin Luther King Jr. Avenue and West Campus Gate 1	C	C	No Change
	20	Martin Luther King Jr. Avenue and West Campus Gate 2/Redwood Drive	C	B	Improve
	148	Martin Luther King Jr. Avenue and Pecan Street	A	B	Degrade
	47	Martin Luther King Jr. Avenue and Cypress Street	A	B	Degrade
	21	Martin Luther King Jr. Avenue and Lebaum Street	C	C	No Change
27	Martin Luther King Jr. Avenue and Malcolm X Avenue	D	E	Degrade	
28	Martin Luther King Jr. Avenue and Raleigh Place	B	B	No Change	
29	Martin Luther King Jr. Avenue and Alabama Avenue	A	B	Degrade	
41	Martin Luther King Jr. Avenue/South Capitol Street/Halley Place	C	E	Degrade	
Firth Sterling Avenue	10	Howard Road and Firth Sterling Avenue/I-295 NB On-Ramp	D	B	Improve
	13	Suitland Parkway and Firth Sterling Avenue	C	D	Degrade
	16	Firth Sterling Avenue and Barry Road/Sumner Road	B	B	No Change
	49	Firth Sterling Avenue and Eaton Road	C	A	Improve
	48	Firth Sterling Avenue and St. Elizabeths Avenue	D	B	Improve
	18	South Capitol Street and Defense Blvd/Firth Sterling Avenue	E	D	Improve
	52	West Campus Gate 6	C	A	Improve
51	West Campus Gate 4	C	C	No Change	
Malcolm X Avenue	23	Malcolm X Avenue and South Capitol Street SB	D	C	Improve
	22	Malcolm X Avenue and South Capitol Street NB	B	A	Improve
	157	Shepherd Pkwy/St.Elizabeths Ave/I-295 Ramps	B	B	No Change
	158	Shepherd Pkwy/St.Elizabeths Ave/I-295 Ramps	B	B	No Change
	24	Malcolm X Avenue and I-295 NB Ramps	A	A	No Change
	160	Malcolm X and I 295 Interchange	B	C	Degrade
	25	Malcolm X Avenue and 2nd Street	D	A	Improve
	26	Malcolm X Avenue and Oakwood Street	A	A	No Change
27	Martin Luther King Jr. Avenue and Malcolm X Avenue	D	E	Degrade	
Howard Rd	50	Howard Road and Anacostia Metro Garage Entrance	A	C	Degrade
	10	Howard Road and Firth Sterling Avenue/I-295 NB On-Ramp	D	B	Improve
	11	Martin Luther King Jr. Avenue and Howard Road/Sheridan Road	D	D	No Change
	12	Howard Road and Sayles Place	A	A	No Change
Suitland Pkwy	8	Suitland Parkway and South Capitol Street	E	E	No Change
	124	Suitland Pkwy /I-295 SB Ramps	D	E	Degrade
	123	Suitland Pkwy /I-295 NB Ramps	D	D	No Change
	13	Suitland Parkway and Firth Sterling Avenue	C	D	Degrade
	125	MLK Jr. Ave and Suitland Pkwy Diamond Interchange	C	C	No Change
	14	Suitland Parkway and Stanton Road	F	F	No Change
Alabama Avenue	29	Martin Luther King Jr. Avenue and Alabama Avenue	A	B	Degrade
	30	Alabama Avenue and Randle Place	C	C	No Change
	46	Alabama Avenue and 7th Street	B	A	Improve
	31	Alabama Avenue and Wheeler Road	B	A	Improve
Good Hope/W st	1	Martin Luther King Jr. Avenue and Good Hope Road	F	E	Improve
	2	Good Hope Road and 13th Street	F	F	No Change
	43	Good Hope Road and Minnesota Avenue	D	C	Improve
	5	W Street and 13th Street	A	A	No Change

Sources: EIS and Master Plan Amendment 2  
 Note: **Bold** represents significant changes



Table 6b: Comparison of AM Intersection Level of Service – EIS and Master Plan Amendment 2

AM Peak Hour Intersection LOS					
Corridor	ID	Intersection Name	AM Peak Hour		
			2035 Alt 2 Modified (2012 Study)	2035 Future Baseline	2035 Alt 2 Modified vs. 2035 Future
			LOS	LOS	Outcome
Martin Luther King Jr. Avenue	201	Martin Luther King Jr. Avenue/11th Street Bridge and I-295 NB Off-Ramp	<b>F</b>	<b>D</b>	<b>Improve</b>
	1	Martin Luther King Jr. Avenue and Good Hope Road	<b>E</b>	<b>D</b>	Improve
	3	Martin Luther King Jr. Avenue and W Street	<b>B</b>	<b>A</b>	Improve
	4	Martin Luther King Jr. Avenue and Pleasant Street/Maple View Place	<b>D</b>	<b>B</b>	<b>Improve</b>
	6	Martin Luther King Jr. Avenue and Morris Road	<b>C</b>	<b>D</b>	Degrade
	7	Martin Luther King Jr. Avenue and Talbert Street	<b>A</b>	<b>C</b>	Degrade
	11	Martin Luther King Jr. Avenue and Howard Road/Sheridan Road	<b>C</b>	<b>D</b>	Degrade
	125	MLK Jr. Ave and Suitland Pkwy Diamond Interchange	<b>C</b>	<b>E</b>	<b>Degrade</b>
	17	Martin Luther King Jr. Avenue and Sumner Road/Stanton Road	<b>D</b>	<b>D</b>	No Change
	19	Martin Luther King Jr. Avenue and West Campus Gate 1	<b>B</b>	<b>E</b>	<b>Degrade</b>
	20	Martin Luther King Jr. Avenue and West Campus Gate 2/Redwood Drive	<b>B</b>	<b>B</b>	No Change
	148	Martin Luther King Jr. Avenue and Pecan Street	<b>B</b>	<b>B</b>	No Change
	47	Martin Luther King Jr. Avenue and Cypress Street	<b>A</b>	<b>B</b>	Degrade
	21	Martin Luther King Jr. Avenue and Lebaum Street	<b>D</b>	<b>F</b>	<b>Degrade</b>
Firth Sterling Avenue	27	Martin Luther King Jr. Avenue and Malcolm X Avenue	<b>D</b>	<b>E</b>	<b>Degrade</b>
	28	Martin Luther King Jr. Avenue and Raleigh Place	<b>E</b>	<b>C</b>	<b>Improve</b>
	29	Martin Luther King Jr. Avenue and Alabama Avenue	<b>C</b>	<b>D</b>	Degrade
	41	Martin Luther King Jr. Avenue/South Capitol Street/Halley Place	<b>E</b>	<b>F</b>	Degrade
	10	Howard Road and Firth Sterling Avenue/I-295 NB On-Ramp	<b>D</b>	<b>B</b>	<b>Improve</b>
	13	Suitland Parkway and Firth Sterling Avenue	<b>D</b>	<b>C</b>	Improve
	16	Firth Sterling Avenue and Barry Road/Sumner Road	<b>A</b>	<b>A</b>	No Change
	49	Firth Sterling Avenue and Eaton Road	<b>D</b>	<b>A</b>	<b>Improve</b>
Malcolm X Avenue	48	Firth Sterling Avenue and St. Elizabeths Avenue	<b>E</b>	<b>C</b>	<b>Improve</b>
	18	South Capitol Street and Defense Blvd/Firth Sterling Avenue	<b>F</b>	<b>C</b>	<b>Improve</b>
	52	West Campus Gate 6	<b>D</b>	<b>D</b>	No Change
	51	West Campus Gate 4	<b>F</b>	<b>B</b>	<b>Improve</b>
	23	Malcolm X Avenue and South Capitol Street SB	<b>A</b>	<b>B</b>	Degrade
	22	Malcolm X Avenue and South Capitol Street NB	<b>B</b>	<b>B</b>	No Change
	157	Shepherd Pkwy/St.Elizabeths Ave/I-295 Ramps	<b>B</b>	<b>C</b>	Degrade
Howard Rd	158	Shepherd Pkwy/St.Elizabeths Ave/I-295 Ramps	<b>B</b>	<b>D</b>	Degrade
	24	Malcolm X Avenue and I-295 NB Ramps	<b>A</b>	<b>A</b>	No Change
	160	Malcolm X and I 295 Interchange	<b>C</b>	<b>D</b>	Degrade
	25	Malcolm X Avenue and 2nd Street	<b>F</b>	<b>B</b>	<b>Improve</b>
	26	Malcolm X Avenue and Oakwood Street	<b>C</b>	<b>C</b>	No Change
	27	Martin Luther King Jr. Avenue and Malcolm X Avenue	<b>D</b>	<b>E</b>	<b>Degrade</b>
Suitland Pkwy	50	Howard Road and Anacostia Metro Garage Entrance	<b>A</b>	<b>A</b>	No Change
	10	Howard Road and Firth Sterling Avenue/I-295 NB On-Ramp	<b>D</b>	<b>B</b>	<b>Improve</b>
	11	Martin Luther King Jr. Avenue and Howard Road/Sheridan Road	<b>C</b>	<b>D</b>	Degrade
	12	Howard Road and Sayles Place	<b>A</b>	<b>A</b>	No Change
Alabama Avenue	8	Suitland Parkway and South Capitol Street	<b>E</b>	<b>D</b>	Improve
	124	Suitland Pkwy /I-295 SB Ramps	<b>C</b>	<b>C</b>	No Change
	123	Suitland Pkwy /I-295 NB Ramps	<b>B</b>	<b>C</b>	Degrade
	13	Suitland Parkway and Firth Sterling Avenue	<b>D</b>	<b>C</b>	Improve
	125	MLK Jr. Ave and Suitland Pkwy Diamond Interchange	<b>C</b>	<b>E</b>	<b>Degrade</b>
	14	Suitland Parkway and Stanton Road	<b>F</b>	<b>F</b>	No Change
Good Hope/W st	29	Martin Luther King Jr. Avenue and Alabama Avenue	<b>C</b>	<b>D</b>	Degrade
	30	Alabama Avenue and Randle Place	<b>B</b>	<b>D</b>	Degrade
	46	Alabama Avenue and 7th Street	<b>C</b>	<b>A</b>	Improve
	31	Alabama Avenue and Wheeler Road	<b>C</b>	<b>C</b>	No Change
Good Hope/W st	1	Martin Luther King Jr. Avenue and Good Hope Road	<b>E</b>	<b>D</b>	Improve
	2	Good Hope Road and 13th Street	<b>E</b>	<b>C</b>	<b>Improve</b>
	43	Good Hope Road and Minnesota Avenue	<b>F</b>	<b>F</b>	No Change
	5	W Street and 13th Street	<b>A</b>	<b>B</b>	Degrade

Sources: EIS and Master Plan Amendment 2

Note: Bold represents significant changes



### 5.2.2 Roadway Metrics

The Master Plan Amendment 2 traffic analysis also developed the metrics for representative roadway segments. This included:

#### Peak Speeds

- Off-Peak Speeds
- Daily Vehicle Miles Traveled (VMT)
- Daily Volumes
- Daily Truck Percentages

**Table 7** presents a comparison of these metrics at a select number of representative roadway segments for the design year. The differences between the 2012 EIS and Master Plan Amendment 2 are negligible. These small variations will not affect noise levels associated with Master Plan Amendment 2.

Overall, Master Plan Amendment 2 is not expected to alter the traffic levels, speeds, and types used in the 2012 EIS. Consequently, the traffic noise environment is not expected to be altered as a result of Master Plan Amendment 2.

**Table 7: Comparison of Travel Demand Model Outputs (2035 Preferred Alternative vs. Master Plan Amendment 2)**

Roadway/Location	AM Speed	Off-Peak Speed	PM Speed	VMT	Daily Volumes	Daily Truck Traffic%
St. Elizabeths Avenue (north of Gate-4) NB	19.18 \ 19.26	18.93 \ 19.01	18.29 \ 19.22	769 \ 609	3661 \ 2902	6.0 \ 4.2
St. Elizabeths Avenue (north of Gate-4) SB	19.02 \ 19.59	19.11 \ 19	16.61 \ 15.7	750 \ 697	3572 \ 3320	2.4 \ 3.2
Malcolm X Avenue EB	19.23 \ 13.51	19.05 \ 17.31	15.57 \ 4.53	1088 \ 1085	6401 \ 6385	3.1 \ 2.5
Malcolm X Avenue WB	17.6 \ 9.76	19.31 \ 16.14	19.03 \ 8.44	885 \ 1151	5206 \ 6768	4.0 \ 3.1
Lebaum Street SE (south of West Campus) EB	14.64 \ 14.37	14.54 \ 14.16	13.5 \ 12.64	279 \ 440	872 \ 1375	1.8 \ 0.9
Lebaum Street SE (south of West Campus) WB	13.84 \ 13.43	14.5 \ 13.61	13.87 \ 13.13	321 \ 590	1003 \ 1844	2.5 \ 1.8
Martin Luther King Jr. Avenue SE (south end of West Campus) NB	21.42 \ 21.18	24.54 \ 24.35	24.43 \ 24.64	496 \ 539	6206 \ 6733	2.2 \ 1.9
Martin Luther King Jr. Avenue SE (south of West Campus) SB	24.81 \ 24.84	24.4 \ 23.99	18.93 \ 21.02	558 \ 630	6969 \ 7875	2.2 \ 1.8
Martin Luther King Jr. Avenue SE (north of West Campus) NB	18.56 \ 21.91	22.78 \ 20.72	20.34 \ 11.82	3727 \ 4480	13802 \ 16592	4.0 \ 2.9
Martin Luther King Jr. Avenue SE (north of West Campus) SB	22.41 \ 15.75	22.27 \ 19.63	6.51 \ 10.1	4200 \ 5054	15554 \ 18718	3.6 \ 2.7



Roadway/Location	AM Speed	Off-Peak Speed	PM Speed	VMT	Daily Volumes	Daily Truck Traffic%
Firth Sterling Avenue (north of West Campus) NB	12.19 \ 13.68	13.15 \ 13.43	10.14 \ 10.91	592 \ 486	5378 \ 4422	17.1 \ 6.5
Firth Sterling Avenue (north of West Campus) SB	12.91 \ 12.94	14.03 \ 14.1	9.83 \ 12.78	457 \ 366	4156 \ 3326	11.2 \ 3.8
Suitland Parkway EB	43.33 \ 43.12	31.88 \ 27.7	9.87 \ 8.99	2057 \ 2168	22856 \ 24085	1.6 \ 1.2
Suitland Parkway WB	11.39 \ 10.61	32.1 \ 27.72	37.38 \ 32.65	2193 \ 2345	24362 \ 26058	1.9 \ 1.3

Note: Each cell shows the comparison of the 2035 Preferred Alternative vs. Master Plan Amendment 2, respectively.

### 5.2.3 Arterial Operation

Master Plan Amendment 2’s Travel Demand Model also evaluated arterial travel times and operations. The operational conditions of different facilities are categorized into four congestion levels by comparing the corresponding Measures of Effectiveness (MOE) values to the LOS thresholds established in the *Highway Capacity Manual, Sixth Edition* (TRB, 2016). Namely, these MOEs are density for freeway segments, and travel speed for arterials. **Table 8** presents the MOE thresholds for LOS criteria and color scheme for congestion levels.

**Table 8: Arterial Level of Service Criteria**

Urban Street Class		Class I	Class II	Class III	Class IV
Free Flow Speed		45 to 55 mph	35 to 45 mph	30 to 35 mph	25 to 30 mph
LOS	Congestion Level	Average Travel Speed (mph)			
A	Light Traffic	>42	>35	>30	>25
B		>34-42	>28-35	>24-30	>19-25
C		>27-34	>22-28	>18-24	>13-19
D	Moderate Traffic	>21-27	>17-22	>14-18	>9-13
E	Heavily Congested Traffic	>16-21	>13-17	>10-14	>7-9
F	Severely Congested Traffic	<=16	<=13	<=10	<=7

FHWA’s TAT guidelines were followed for VISSIM microsimulation modeling, including model calibration methodology, seeding time, the number of simulation model runs, simulation parameters, and MOE outputs. The TTR summarizes the VISSIM model parameters and assumptions in detail.

**Table 9** summarizes the analysis of the arterial operations. Operations are roughly equivalent. Three arterial segments are expected to experience a significant improvement. One arterial segment is expected to experience a significant degradation in operation.



**Table 9: Arterials Operations**

AM and PM Peak Hour Arterial Travel Times and Operations			AM Peak Hour				PM Peak Hour			
			2035 Alt 2 Modified (2012 Study)		2035 Future Baseline (MPA #2)		2035 Alt 2 Modified (2012 Study)		2035 Future Baseline (MPA #2)	
			Average Speed (mph)	Arterial LOS	Average Speed (mph)	Arterial LOS	Average Speed (mph)	Arterial LOS	Average Speed (mph)	Arterial LOS
Arterial Corridors	Direction	Segment Start/End Location								
MLK Jr. Avenue	NB	From Xenia Street to O Street	12	D	14	C	5	F	12	D
MLK Jr. Avenue	SB	From O Street to Xenia Street	13	C	11	D	14	C	11	D
Firth Sterling Avenue	NB	From Gate 4 to North of Howard Road	10	D	7	E	7	E	8	E
Firth Sterling Avenue	SB	From Howard Road to Gate 4	5	F	8	E	5	F	9	E
South Capitol Street	NB	From Douglass Memorial Bridge to Halley Place	14	D	26	B	24	B	27	B
South Capitol Street	SB	From Halley Pl to Douglass Memorial Bridge	17	C	31	A	28	B	22	C
Suitland Parkway	EB	From South Capitol to Stanton Road	27	C	29	B	17	C	10	E
Suitland Parkway	WB	From Stanton Road to South Capitol Street	14	C	15	D	31	C	25	B

As documented in the FHWA website on Highway Traffic Noise and concisely summarized in the Maryland DOT's website (<https://www.roads.maryland.gov/Index.aspx?PageId=827>), the propagation of traffic noise follows several well-known principles. The loudness of traffic noise is generally increased by a closer distance to the highway, heavier traffic volume, higher speed, and a larger number of trucks.

Relative to the cumulative speed difference is a 29-mph improvement in the AM and 9-mph loss in the PM. However, none of the arterials will achieve their Free Flow Speed in any of the comparisons. Consequently, this improvement is expected to have a minimal impact on overall noise levels. This is because the potential increases in speed or volume through the corridor would be counterbalanced with the area's overall low speed limits and the reduced noise from less frequent starting and stopping.

The maximum improvement is 14 mph. The maximum degradation is 7 mph. In general, traffic at 65 miles per hour sounds twice as loud as highway vehicles traffic at 30 miles per hour. None of the segments are expected to achieve that level of increase in speed.



## 6 ANALYSIS OF CONSTRUCTION AND OPERATIONAL NOISE CHANGES

Construction noise is composed of the noise generated during the development of the proposed roadways that are part of the project and noise generated by demolition as well as the construction of the proposed buildings on the West Campus. The noise associated with the operation of the buildings is also a component. These will be discussed here.

### 6.1 Summary of 2012 EIS Construction and Operational Analysis

The construction noise analysis presented in the 2012 EIS is organized within the following three areas:

1. North Parcel - The Preferred Alternative for development of the East Campus North Parcel is Alternative B (Campus Reflection).
2. I-295/Malcolm X Avenue SE interchange - The Preferred Alternative for improvements to the I-295/Malcolm X Avenue SE interchange is Alternative 2 Modified.
3. Martin Luther King Jr. Avenue SE - The Preferred Alternative for improvements to Martin Luther King Jr. Avenue SE is Alternative 1.

#### 6.1.1 North Parcel/West Campus

Pursuant to Master Plan Amendment 2, there will be no work on the North Parcel/East Campus. However, the construction activities described for the North Parcel will be equivalent to the activities that will take place in the West Campus.

The construction noise impacts for the development of the North Parcel site were described in the 2012 EIS as “short- and long-term, minor, and adverse during construction and operational activities.” The effects would primarily be due to heavy equipment noise during construction and the maintenance and use of back-up generators during the operation of the facilities.

As with any major construction project, areas around the construction site are likely to experience varied periods and degrees of noise. Individual pieces of construction equipment typically generate noise levels of 80 to 90 dBA at a distance of 50 feet. **Table 10** presents typical noise levels (dBA at 50 feet) that the FHWA uses in the Roadway Construction Noise Model (RCNM) for outdoor construction noise.

**Table 10: Noise Levels Associated with Outdoor Construction**

Equipment	Leq (dBA) at 50 feet from Source
Concrete Saw	90
Drum Mixer	80
Pneumatic Tools	85
Mounted Impact hammer	90
Slurry Plant	78

Source: FHWA 2006



With multiple pieces of equipment operating concurrently, noise levels can be relatively high during daytime periods at locations within several hundred feet of active construction and drilling sites. The zone of relatively high construction noise levels typically extends to distances of 400 to 800 feet from the site of major construction operations. Because construction activities would be confined primarily to daytime hours, noise at nearby receptors might be clearly audible, but would be temporary and minor. In addition, any construction activity on the West Campus would adhere to the District of Columbia Noise Regulations. As part of the building permitting process, the applicant would ensure in writing that the planned construction would comply fully with the limitations established by the Noise Regulations.

Relative to operational noise, the only substantial stationary sources of noise associated with the 2012 EIS's development alternatives are the two 1,500-kW back-up generators. The generators would be enclosed with the intake and the exhaust open to the exterior. Generators would be operated a few hours per month for maintenance purposes and during periods when limited or no power was supplied by the electrical grid. Noise for the generators at 50 percent and 100 percent capacity was estimated. Noise during operation of the emergency generators would be remotely audible but would be substantially masked by existing ambient sources of noise particularly in the daytime hours. Noise during operation of the emergency generators would not be expected to exceed the District of Columbia's noise limit of 55 dBA during the night or be highly annoying to nearby residences.

### 6.1.2 I-295/Malcolm X Avenue SE Interchange

The 2012 EIS reports that short- and long-term, minor, adverse effects on the noise environment are expected from the construction of the I-295/Malcolm X Avenue SE Interchange. The effects would primarily be due to heavy equipment noise during construction and the changes in traffic near the transportation improvements and on surrounding roadways. Locations within 800 feet of the transportation improvements would experience appreciable levels of heavy equipment noise. Because construction activities would be confined primarily to daytime hours, noise at nearby receptors would be clearly audible but would not likely be highly annoying. In addition, any construction activity on roadways would adhere to the District of Columbia Noise Regulations, which sets a noise level limit of 80 dBA for construction equipment between 7 a.m. and 7 p.m. and 55 dBA in the evening and at night. These effects would be temporary and minor.

Construction began in the Summer 2018 and is expected to be completed by Winter 2021.

### 6.1.3 Martin Luther King Jr. Avenue SE

The 2012 EIS reported that the construction noise "effects would be identical to those described under the I-295/Malcolm X Avenue SE Interchange Improvements and would be primarily due to heavy equipment noise during construction and changes in traffic."

## 6.2 Review of Construction Plan Associated with Master Plan Amendment 2

The primary elements of the Master Plan Amendment 2 are site development, provisions for additional parking, and minor transportation improvements to accommodate additional personnel on the West Campus (**Section 4.2.1**).

### 6.2.1 Development of the West Campus

The construction of the West Campus was investigated in the 2008 EIS. The use of St. Elizabeths to house DHS Headquarters would utilize existing resources to allow construction of new buildings to provide 4.5 million gsf of office and shared-use space, plus parking at a ratio of one space for every four employees.

As a result of the development of West Campus, the noise analysis concluded that the area would experience varied periods and degrees of noise impact. However, construction activity on the West Campus would adhere to the District of Columbia Noise Regulations as stipulated by Federal law in regard to preserving peace and order. Further, it suggested that the alternatives would result in negligible, direct, long-term increases in noise levels that would be imperceptible, or barely perceptible, to human ears. Because of the minor nature of impacts and existing high levels of urban community and traffic noise, noise increases associated with the project would not result in adverse indirect impacts.

The new construction associated with the relocation of DHS facilities into the West Campus is expected to be minimal. The construction of the FEMA facility will be consolidated into the overall West Campus Construction Plan. Like the original proposals, there will be multiple pieces of equipment operating concurrently. In general, the distance between the Master Plan Amendment 2 improvements and the noise-sensitive land uses around the West Campus will generally be in excess of 1,000 feet. However, some intermittent construction may be expected along the property boundary as well.

### 6.3 Evaluation of Construction Plan Changes

Construction noise is expected to be similar to those previously estimated in both 2008 and 2012. In short, construction activities would be confined primarily to daytime hours; noise at nearby receptors might be clearly audible but would not likely be highly annoying. These effects are expected to be temporary and minor. In addition, any construction activity would adhere to the District of Columbia Noise Regulations. As part of the building permitting process, the applicant would ensure in writing that the planned construction would comply fully with the limitations established by the Noise Regulations.

Relative to operational noise, the only substantial source is associated with back-up generators. Noise during operation of the emergency generators would be remotely audible but would be substantially masked by existing ambient sources. Noise during operation of the emergency generators would not be expected to exceed the District of Columbia's noise limits or be highly annoying to nearby residences. Additionally, the distance between the proposed project and the residences would diminish the effects of construction noise on the residences.



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## 7 CONCLUSIONS AND MITIGATIONS

This report documents an analysis of the potential noise consequences associated with the Master Plan Amendment 2. The conclusions are as follows:

### 7.1 Analysis of Noise-Sensitive Land Uses

Land uses within the project area have only modestly changed since the noise evaluations reported in the 2012 EIS. All of the new land uses are institutional uses such as schools, pavilions, and office buildings. No exterior activities dependent on a quiet atmosphere are present, and no noise impacts are expected.

Further, as discussed in **Section 5**, the conditions associated with the traffic noise conditions (volumes/speeds/roadways) would not substantially change. Without substantial changes in these factors, changes in the traffic noise environment do not occur.

The 2012 EIS concluded that noise levels would not approach the Noise Abatement Criteria. Consequently, traffic noise impacts are not expected. The updated land uses are situated such that they are also not expected to experience traffic noise that would approach the Noise Abatement Criteria.

### 7.2 Analysis of Roadway Configuration

The changes associated with the Master Plan Amendment 2 are minor and are not expected to materially change the roadway configuration in the vicinity of the noise-sensitive land uses. Consequently, the Master Plan Amendment 2 will not affect the noise environment.

The roadway changes associated with the Master Plan Amendment 2 include:

- Modifications are needed to the Gate 1 garage design so that traffic exiting the garage in the PM peak hour does not queue back into the garage. Because there are no noise-sensitive land uses in this area, no differential additional impacts are expected.
- The Master Plan Amendment 2 would add a protected turn phase for northbound left turns at the intersection of Sumner Road and Martin Luther King Jr. Avenue SE. This alteration is minor in relation to sensitive noise receptors and would not affect changes in traffic noise.
- The proposed relocation of the Metrorail Station shuttle stop will support the effectiveness of transit. This change mostly affects the DC Gateway Pavilion in the East Campus (on the proposed Sycamore Drive) and no other sensitive receptors. The DC Gateway is not dependent on a quiet atmosphere, and the minimal impacts associated with the new trips are not expected to alter the noise environment.

Therefore, the proposed transportation and land-use assumptions for the Master Plan Amendment 2's transportation analysis are largely inconsequential in regards to traffic noise.

### 7.3 Analysis of Traffic Volumes, Speeds and Types

Overall, the Master Plan Amendment 2 is not expected to substantially alter the traffic levels, speeds, and types used in the 2012 EIS. Consequently, the traffic noise environment is not expected to be altered as a result of the Master Plan Amendment 2.

Using the network of intersections, overall, intersection operation is expected to modestly improve. This improvement is expected to have a minimal impact on overall noise levels. This is because the potential increases in speed or volume through the intersection would be counterbalanced with the area's low speed limits and the reduced noise from less frequent starting and stopping.

Using Travel Demand Model metrics regarding peak speeds, off-peak speeds, daily VMT, daily volumes and daily truck percentages between the 2012 EIS condition and the Master Plan Amendment 2 condition are so similar as to have no consequence regarding noise.

Relative to arterial level of service, the maximum improvement is 14 mph at one segment. This modest improvement is not expected to impact traffic noise.

### 7.4 Analysis of Construction and Operational Noise Changes

Because the construction of the FEMA facility on the East Campus has been eliminated, construction noise is expected to be similar to those previously estimated in the 2008 EIS.

Relative to operational noise, the only substantial source is associated with back-up generators. Noise during operation of the emergency generators would be remotely audible but would be substantially masked by existing ambient sources. Noise during operation of the emergency generators would not be expected to exceed the District of Columbia's noise limits or be highly annoying to nearby residences.

### 7.5 Mitigation

No mitigation measures related to short-term or long-term noise impacts are warranted because Master Plan Amendment 2 would not cause substantial noise impacts associated with construction and operation.

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