



ANACOSTIA WATERSHED SOCIETY

FOR IMMEDIATE RELEASE

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Anacostia Watershed Society Statement on the FBI Headquarters Relocation

(January 27, 2016) Anacostia Watershed Society has joined with the Chesapeake Bay Foundation, Clean Water Action, Coalition for Smarter Growth, 1000 Friends of Maryland and the Natural Resources Defense Council in urging the General Services Administration to select a site for the new FBI headquarters that will have the least environmental impacts and the most improvements to the Anacostia River watershed, while ensuring sustainable economic development for residents.

The full text of the letter submitted to the GSA is attached, but among the points most relevant to the restoration and long term protection of the Anacostia River are:

- All three sites offer the potential to improve current practices with stormwater runoff, by reducing the amount of existing impervious surfaces and by meeting newer state standards and the strong federal requirements of the Energy Independence and Security Act of 2007;
- We encourage the GSA to select a site that fulfills regional land use and smart growth goals, and in that regard believe that Greenbelt best meets those goals.
- The Greenbelt site offers a creek-side natural buffer that would receive less polluted runoff following re-development for the FBI complex. We urge that buffer remain undisturbed and fully protected as it drains to Indian Creek just below its juncture with Upper Beaverdam Creek, another important headwaters stream of the Anacostia River.
- We strongly recommend that third-party standards and certifications, such as those from the U.S. Green Building Council (LEED standards at least at the Gold level), and for roads, the NACTO and Greenroads be utilized for the design and construction of the facility, regardless of the final site selected.

The letter asks the GSA to include these and other stipulations to better integrate the proposed development into area communities and protect water quality in the final Environmental Impact Statement (EIS) it is scheduled to release in late 2016. Designs submitted by developers must meet the requirements of the EIS.

We look forward to working closely with the GSA to develop a new FBI headquarters that serves the residents of the Anacostia watershed by protecting the environment and spurring sustainable economic development.

About the Anacostia Watershed Society (AWS)

The mission of the Anacostia Watershed Society is to protect and restore the Anacostia River and its watershed communities by cleaning the water, recovering the shores, and honoring the heritage. The vision is to make the Anacostia River and its tributaries swimmable and fishable by 2025, in keeping with the Clean Water Act, for the health and enjoyment of everyone in the community. Community involvement is critical to achieving this vision and AWS seeks strong partnerships and coalitions with all parts of the community, government, and other stakeholders. Anacostia Watershed Society's programs include environmental education, stewardship, recreation, and engaging the community through advocacy and volunteer opportunities. www.anacostiaws.org



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December 23, 2015

U.S. General Services Administration
Public Buildings Service
National Capital Region
Office of Planning and Design Quality
ATTN: Ms. Denise Decker
301 7th Street, S.W., Room 4004
Washington, D.C. 20407

RE: FBI Consolidation DEIS

Thank you for this opportunity to review the Draft Environmental Impact Statement (DEIS) for the potential relocation and consolidation of the FBI Headquarters (HQ) from the J. Edgar Hoover building to a secure, transit-centered location. At the outset, we wish to note that the relocation of federal facilities from the core of the region to suburban and outer suburban locations has had significant and frequently negative impacts on transportation, land use and the environment – generating large costs for new infrastructure and contributing to a shift from transit to driving. For example, the last Base Realignment and Closure process moved approximately 22,000 jobs away from transit-accessible locations close to the core, to locations where driving is the sole or primary means of access. Therefore, retention of federal facilities in DC is preferred from a regional sustainability perspective.

Given the expressed intention to relocate the FBI HQ outside of the District of Columbia, however, the GSA and FBI are to be commended for closely considering two underutilized Metro station options. Furthermore, it is important to recognize the value of redevelopment of areas of existing impervious surface. Redevelopment creates a win-win in that it allows for retrofitting of stormwater controls and reduces the pressure to convert remaining forests and farms to development.

As you know, some of the undersigned organizations communicated with GSA prior to the development of the DEIS about a number of issues which we believed to be important as the consideration and environmental study of this project moved forward. Please consider this comment an indication of our continuing interest in this matter.

We recommend herein some additional work toward making the Final Environmental Impact Statement (FEIS) a more complete examination of the build/no build impacts that could occur as a result of the consolidation on one of the three sites of focus: the Greenbelt Metro parking area (Maryland), the old Landover Mall site (Maryland), and the federal warehouse site in Springfield (Virginia). Additionally, we believe additional assurances and commitments by the federal government are in order,

with respect to certain aspects of the development of the proposed facility, as discussed below.

Water. All three sites would, in general, improve how polluted stormwater runoff is handled at those locations, since they would create more pervious (green) area for infiltration around the new HQ building(s), converting from current, mostly impervious conditions, as well as installing stormwater runoff management practices which meet newer state standards and the strong federal requirements under §438 of the Energy Independence and Security Act of 2007. We are pleased to note that at none of the sites' do the potential FBI facilities appear to directly adversely impact any wetlands, on a long term basis or to any significant extent.

The Greenbelt site allows a creek-side natural resource area to serve as part of its security buffer. We strongly urge that such area remain undisturbed and fully protected in its current, naturally forested condition; that the 0.81 acres of floodplain encroachments that are projected must be mitigated, with that mitigation fully identified in the FEIS; and that any perimeter security fencing should not significantly interfere with wetlands, floodplain, or stream system functions. The Zachiah-Issue hydric soils complex comprises 23 acres of the Greenbelt site where the planned natural resource buffer/security area is located; this further complicates the placement of such fencing, and argues for its placement outside such area. Without strong assurances on each of these matters in the FEIS and subsequent development documents, some of the positive environmental attributes of this site are lessened.

As a local matter with respect to the Greenbelt site, it is of utmost importance that any induced future development in the general area of the Greenbelt site avoid/effectively mitigate any impacts to existing open space, greenbelts, agricultural research areas, and waterways (e.g. Indian Creek and Upper Beaverdam Creek), as well as any other Anacostia headwaters resources in this part of Prince George's County.

While no wetlands or waterways are reported on Landover or Springfield sites, potential impacts to *nearby* wetlands, waterways, or floodplains – if any – should be identified in higher detail, as should impacts to original site hydrology as they have been on the Greenbelt site. In Springfield, where tens of thousands of square feet of government-leased space would need to relocate somewhere else as a result of displacement by an FBI facility, such relocation should be adequately analyzed in the FEIS for water/environmental impact.

Air. While there are variable air quality impacts, on balance Greenbelt and Springfield exhibit substantially better results in the build condition than does Landover. The significantly higher vehicle miles of travel (VMT) that would occur at the latter site is a result of its not being commuter rail (Metro)-proximate, leading to significantly higher levels of driving and greenhouse gas emissions. Springfield has higher total NOx emissions as measured against the 1-hour National Ambient Air Quality Standard (NAAQS) of 100ppb (i.e. just reaching that standard), due in part to current conditions at

that site; on the other hand, its average annual emissions increment is low relative to the average annual NAAQS standard.

Transit, Pedestrian Access, Traffic, and Land Use. Greenbelt and Springfield perform considerably better than Landover from a transit perspective, attaining very high Metrorail mode shares of 48 and 37 percent, respectively. While the Greenbelt site would cause Capital Beltway congestion in the AM/PM peak at and near the off and on-ramps, most of the adverse Springfield traffic impacts would instead occur on about 20 surrounding roads and intersections, such as the Franconia-Springfield Parkway. Springfield's pedestrian connection to the Metro station is considerably worse than Greenbelt's, with a longer (almost ½ mile) and (especially at night) unpleasant walking experience, which circumstances serve to depress mode share for Metrorail. Landover, like Greenbelt, would cause notable Beltway congestion at and near its entrance and exit ramps, and Landover has no pedestrian connection to Metro or indeed, to other destinations of utility.

In order to enhance accessibility to this facility and reduce congestion impacts at any of the possible FBI relocation sites, we also urge full consideration and inclusion of transportation demand management (TDM) as a component of the facilities' transportation plans. The FEIS should evaluate the contribution that such TDM components as shared mobility, for example (e.g. Zipcar and similar companies), computer-assisted ride-sharing, and organized car-and van-pooling, among other measures, can make to help mitigate bus and automobile-related traffic impacts. GSA should commit to considering and utilizing TDM as part of a facility development plan in whichever location is chosen.

As part of the FEIS for the FBI at the Greenbelt location -- and as part of Prince George's County requirements and commitments for the adjacent private redevelopment at Greenbelt Metro -- provisions should be made to extend the extensive bike paths (depicted in Section 5, Figure 5-25, page 266, DEIS) south of Route 193 so that they connect to the substantial Maryland-National Capital Parks and Planning Commission's Anacostia Tributary Trail System. Such a requirement would make the FBI HQ (and the private development next door) accessible to the growing number of employees who wish to commute by bike, as well as it would enhance the trail system already in place.

All in all, from a land use perspective, Greenbelt and Springfield have slightly different relocation advantages, and Landover has significant disadvantages. Greenbelt and Springfield's environmental impacts are somewhat similar, although Greenbelt's local water resources must be protected. Landover, on the other hand, produces higher greenhouse gases due in part to auto and bus-only access. We agree with the Primary Site Planning Principles and Design Requirements noted in the DEIS that pertain to promoting the use of transit. Our considered view is that excellent *transit* access (rather than ease of single occupant vehicle access -- especially in future, ever more congested decades) is crucial for this major federal relocation, with the highest transit mode share being attained in Greenbelt in part due to station proximity.

On the negative side, as noted above, Springfield's development would require the relocation (somewhere in the area?) of tens of thousands of square feet of warehouse and other specialty government tenants; this should be added and adequately described in the FEIS as potential environmental and transportation impacts from a project at Springfield. Finally in this light, an FBI location at Landover does not comport with the County land use plan for that Sector, and overall is the least desirable from both environmental and smart growth perspectives (noted below).

Smart Growth, Equity, and Economic Development. On balance, the Greenbelt and Springfield sites are projected to result in somewhat similar levels of environmental impact and benefit. The Greenbelt site, however, would also help to address regional equity, employment, economic development, and smart growth objectives. The Greenbelt Metro site fulfills both County and regional land use and smart growth objectives for channeling new mixed-use and jobs-rich development around less developed transit centers on the eastern side of the region, primarily in Prince George's County and the District of Columbia.

These goals have repeatedly been articulated over the years by the Metropolitan Washington Council of Governments and the Transportation Planning Board from as far back as the 1990's, and include acknowledgment of the Brookings Institution report, *A Region Divided* (1999); work by the Urban Land Institute, the Greater Washington Board of Trade, the Transportation Planning Board, and the environmental, university, and civic communities with the metropolitan area's "Reality Check" exercise in 2005; the Council of Governments' *Region Forward* vision plan goals, objectives and implementing documents; and numerous citizens' and non-profit organizations' advocacy (including that of some of the undersigned), expressed in their own reports, studies, and public testimony over the years.

Integration and access among Metro, private mixed-uses and the FBI; design standards and certification. Finally, it should be noted that while this appears to be an opportunity to begin to realize economic and mixed employment objectives at Greenbelt, that opportunity would be enhanced if the design of the proposed roadway- and Metro-adjacent private development there (that is not part of the FBI facilities) were re-examined and improved, especially as regards any potential wetlands or water-related impacts. Additionally, the current roadway concept to serve this new development and the FBI appears to create a wide, automobile-exclusive, grade-separated design with an underground walkway between the Metro station and the FBI headquarters. This would make the short walk to or from the FBI somewhat disjointed and less inviting, instead of encouraging walkability and connectivity between new institutional and new commercial land uses, and Metro.

An example of one alternative solution might be to depress Greenbelt Station Parkway for about 100 linear feet, decking over it for ungraded pedestrian/bicycle access instead of depressing the pedestrian access beneath the road; rather than a "parkway," the road would be changed to be more of a "urban street" design, with a short underpass. Another potential solution might be to design this road as a "Green and Complete

Streets” roadway that slows traffic, adds green features, and provides a pedestrian-friendly walking path both along its length and across it to the FBI.

Finally, we strongly recommend that third-party standards and certification, such as those from the U.S. Green Building Council (LEED standards at least at the Gold level), and for roads, the National Association of City Transportation Officials (NACTO) and Greenroads, be utilized for the design and construction of the new FBI facility. Again, we seek a commitment by the GSA within the FEIS for such an approach.

Thank you again for the opportunity to review the DEIS and present our views on this important project. We look forward to an FEIS that fully includes the matters referenced in these comments.

Sincerely,

Lee R. Epstein
Director, Lands Program
Chesapeake Bay Foundation

FOR:

1000 Friends of Maryland
Anacostia Watershed Society
Clean Water Action
Coalition for Smarter Growth
Natural Resources Defense Council
Piedmont Environmental Council