December 18, 2015

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

RE: FBI Headquarters Consolidation Draft Environmental Impact Statement

Dear Ms. Decker,

Thank you for the opportunity to provide comments for the FBI Facility Consolidation and Relocation Draft Environmental Impact Statement (DEIS). It is our strong belief that the Greenbelt site is the best location for a consolidated FBI headquarters. The site is ideally located adjacent to an extensive transportation network and secured by a forested stream buffer area. We reiterate our support for relocating to Greenbelt and are confident the site provides the greatest benefits for FBI employees, our citizens and the region.

As shown in the DEIS, the Greenbelt alternative provides the unique opportunity to positively benefit the environment through the construction of the FBI headquarters. The transformation of the existing impervious surface parking lot into a new FBI campus will result in the long-term improvement of environmental conditions on site, to the nearby stream valley, and ultimately to the Anacostia River. We ask that careful consideration of the wetlands and impacts to the floodplain be prioritized during the layout design of campus facilities. Greenbelt is a strong advocate for projects that will positively impact the natural environment and we are very pleased with the initial findings of the DEIS.

Greenbelt alone provides a superior transit facility directly adjacent to the site which is easily walkable from Metro and further supported by robust regional transportation infrastructure. Relocation to Greenbelt not only supports the mission of the FBI and the General Services Administration, but also promotes an improved quality of life for FBI employees. Use of Metrorail in a reverse commute and shuttle-free access to transit will reduce employee travel time and make more efficient use of the Metrorail system. Pedestrians and bicyclists will be supported by expanding multi-modal facilities. Finally, the City supports the majority of recommended improvements developed during the DEIS's traffic analysis to optimize traffic signals and improve lane geometry. We ask that intersection improvements minimize road widening where feasible.

The value of developing vibrant regional transit centers that capitalize on transit infrastructure and private development cannot be overstated. Greenbelt's regionally competitive office parks provide exceptional opportunities for private suppliers to locate in close proximity to the new campus. Relocation of the FBI campus to Greenbelt would contribute to economic growth locally and in Prince George's County, while equalizing the unbalanced allocation of federal economic impacts in the region.

In addition to the many benefits of the Greenbelt site outlined in the DEIS, the City maintains an abundance of recreational facilities and services that further support the FBI and its employees. Greenbelt operates its own full service recreation department with facilities and programs that directly respond and meet the needs of our residents and businesses. In addition, Greenbelt residents and employees can take full advantage of the facilities and programs of the Maryland-National Capital Park and Planning Commission (the Metropolitan District). The Greenbelt site also exclusively provides proximity to mixed use development amenities offering dining, shopping, and hotel services.

We encourage the General Service Administration (GSA) to consider the many positive impacts associated with the Greenbelt site in the identification of a preferred site alternative. It should be noted that many of the Greenbelt Alternative adverse impacts are short-term and associated with facilities construction. The identified major traffic impacts can be addressed through scheduled transit and transportation improvements as well as recommended mitigation actions.

As the project moves forward with the Final Environmental Impact Statement (FEIS) and development proposals, the City requests that the following remaining concerns be addressed:

- The City strongly encourages the GSA to select development proposals that locate the perimeter fence outside of the Indian Creek stream channel, wetlands, and riparian forest area.

- It is our opinion that the visual impacts associated with the build alternative at Greenbelt will be an improvement to the existing conditions at the site.

- The City asks that the FEIS reconsider the identification of natural gas as a major adverse impact. In a recent meeting, Washington Gas indicated that the Greenbelt Road (MD 193) line has sufficient capacity to service the site and would not require crossing I-495.

- The City encourages GSA to pursue a lease of the facility site which will support the extension of local fire, police, recreation and social services to support the new headquarters.

In addition to these comments, we have provided specific comments in Attachment A to correct some inaccuracies and mistakes found in the DEIS. On behalf of the City Council, I want to thank you again for this opportunity to comment and to reiterate that the City would like to be included in all upcoming process opportunities.

Sincerely,

Emmet Jordan
Mayor

CC:

DRAFT ENVIRONMENTAL IMPACT STATEMENT
FBI HEADQUARTERS CONSOLIDATION
CITY OF GREENBELT COMMENTS

Specific comments (listed by section or page number)

5.1.2.; Page 235, footnote 1; Page 250, shaded box	Greenbelt is not in the Metropolitan district. Discussion of M-NCPPC having administrative jurisdiction over parkland and recreation systems is inaccurate. The City of Greenbelt provides extensive recreational facilities which are managed locally.
Page 235, footnote 1	States that the Greenbelt APB participated in the development of the Greenbelt Sector Plan and SMA. Should also state that the City Council participated.
Figure 5-10	Several inconsistencies in the existing land use map
Page 238	List "Hanover Park" as being a focus of the sector plan, Should be "Hanover Parkway"
5.1.7.3	Lists the Prince George's County tax rate but does not list the City of Greenbelt property tax rate.
5.1.7.5; 5.1.8.1; 5.2.8.1; 8.1.2.8	The Greenbelt Police Department is an independent, full-service department funded by the City of Greenbelt and provides primary police services within the City. Throughout the document the discussion of police services is inaccurate as it describes the Greenbelt police jurisdiction as being a subsidiary beat to Prince George's County District 2, and later refers to it as District 2. Also, the distance to the Greenbelt Police Station is listed as 1.6 miles. The distance is approximately 0.9 miles or 4800 feet.
Table 5.4	Lists the distance from the Greenbelt Police Station as 2.1 miles, and within the narrative describes the distance as 1.7 miles – neither of which is correct. The distance is approximately 0.9 miles or 4800 feet. Also lists the police response time as 4.2 minutes, which reflects the county response time – not the city police response time. (3:27 in 2012; 3:14 in 2013, 3:25 in 2014)
Table 5-25	Lists Capitol Office Park as having 300,000 square feet of unbuilt, approved building area. City records indicate that there is approval for four additional buildings with a combined approved floor area of 602,000 square feet.
8.1.1.2	The Greenbelt Station south core development program is inaccurate. The approved program consists of 302 apartments and 342 townhomes. A remaining unplanned and unbuilt section may be constructed under existing approvals with a maximum 339 additional housing units and a maximum of 115,000 SF gross floor area of neighborhood serving retail.

Throughout Document	Greenbelt Metro Drive is known as Metro Access Drive.
5.1.9.5, Page 265	There are a total of three pedestrian crossings on Metro Access Drive (Greenbelt Metro Drive). In addition to the two crossings identified in the DEIS (at the kiss and ride and Cherrywood Lane roundabout), a third pedestrian crosswalk is located near the I-495 Northbound ramp between the Metro parking entrance and Cherrywood Lane.
5.2.12.4 Natural Gas	This section proposes connecting under the Beltway to the nearest transmission line rather than the best suited line located at Greenbelt Road (MD 193). Although not identified in the study, Washington Gas confirms that the MD 193 line would best serve the site and has adequate capacity now as well as future scheduled and funded upgrades. The gas line is best run alongside Greenbelt Station Parkway.