April __, 2016

Via email to fbi-hq-consolidation@gsa.gov and
certified mail, return receipt requested
U.S. General Services Administration
Attention: Denise Decker, NEPA Team Lead
301 7th Street, SW, Room 4004
Washington, D.C. 20407

RE: Federal Bureau of Investigation (FBI) Headquarters Consolidation
Solicitation Number: FBIHQSiteEOI

Dear Ms. Decker:

This letter is sent in regard to the revised FBI employee parking requirement announced at the Information Presentation to the National Capital Planning Commission (NCPC) on March 3, 2016. In particular, this letter concerns the announced increase in FBI employee parking from 3,600 to 6,076 parking spaces to be located at the proposed consolidated FBI Headquarters in Greenbelt. Greenbelt is one of the three shortlisted sites eligible to compete for the award of the consolidated FBI Headquarters.

We request this letter be included as a supplement to our letter of December 18, 2015 submitted to provide comments to the Draft Federal Bureau of Investigation (FBI) Headquarters Consolidation Environmental Impact Statement prepared by the U.S. General Services Administration (GSA) and dated November 6, 2015 (the "Draft EIS"). As the increased parking requirements were not included in the Draft EIS, the City of Greenbelt was unable to comment during the public comment period.

The City opposes GSA's decision to increase required parking at the Greenbelt site beyond the parking ratio recommended by NCPC guidance. A failure to limit on-site parking at the proposed FBI Headquarters (as recommended by NCPC guidelines) is inconsistent with the direction of Executive Orders issued by the President as well as GSA's own Order issued on October 6, 2015 (ADM 1097.1 CHGE 1). Excess parking at the Greenbelt site substantially increases the cost of the new headquarters to the Government, imposes substantial and ongoing costs to Metro and local jurisdictions, promotes increased road congestion and greenhouse gas emissions, and does not maximize the transit opportunities at this site.

Constraining parking at federal facilities is a critical part of a Transportation Management Plan (TMP) that generally includes carpool/van pool incentives, transit incentives, telecommuting programs and bicycling/walking to work incentives. While we understand that, given the nature of the facilities, FBI employees may have less ability to telecommute than many other federal employees, it is precisely that reason that GSA and FBI should place greater emphasis on other aspects of a comprehensive TMP, including providing a robust transit incentive and prioritizing public transportation over driving.

On October 5, 2009, the President issued Executive Order (E.O.) 13514, *Federal Leadership in Environmental, Energy and Economic Performance*. E.O. 13514 states that "It is the policy of the United States that Federal agencies shall…design, construct, maintain, and operate high performance sustainable buildings in sustainable locations." E.O. 13514 also resulted in the issuance of *Implementing Instructions - Sustainable Locations for Federal Facilities* by the White House Council on Environmental Quality (CEQ) included in the implementing instructions is a direction that "Agency location decisions should take into consideration the promotion of a variety of transportation choices with a focus on encouraging public transportation and transit oriented development (TOD)."

On March 19, 2015, the President issued Executive Order 13693, *Planning for Federal Sustainability in the Next Decade, reaffirming earlier guidance*. Directly, that executive order requires agencies to "consider the development of policies to promote sustainable commuting and work-related travel practices for Federal employees." It also resulted in the issuance of *Guiding Principles for Sustainable Federal Buildings and Associated Instructions* instructing agencies to "prioritize sites that offer robust transportation options, including walking, biking, and transit, and minimize the combined greenhouse gas emissions of the building and associated commuter and visitor transportation emissions over the project's life."

At $18,000/space, the additional almost 2,500 parking spaces will increase the cost of the new Headquarters by approximately $45 million; a cost that will be borne directly by taxpayers. That cost does not include the cost of additional facilities to screen incoming vehicles and additional infrastructure that will be required to accommodate the additional traffic that will certainly accompany the vehicle occupying those spaces.

The proposed campus for the FBI at the Greenbelt location is just 284 feet from the Greenbelt Metro Station, bus stops, and the MARC train station, creating a model transit oriented campus. The ease of commuting by mass transit to this location is an objective directly in line with Presidential Executive Orders, GSA directives, and NCPC goals. Adding parking as suggested runs counter to all of this and harms the region.

Sincerely,

Emmett V. Jordan
Mayor

cc: Marcel Acosta, Executive Director, National Capital Planning Commission
Anthony Costa, Senior Advisor to the Administrator
William Dowd, Project Executive, GSA
Norman Dong, Commissioner of the Public Buildings Service, GSA
Nia Francis, Project Manager, GSA
Shyam Kannan, Managing Director, Office of Planning, WMATA
City Council
Honorable Barbara Mikulski
Honorable Benjamin Cardin
Honorable Steny Hoyer
Honorable Paul Pinsky
Honorable Anne Healey
Honorable Tawanna Gaines
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Honorable Derrick Leon Davis
Honorable Todd Turner
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Jessica Bellah, Community Planner
Greenbelt News Review