

STAFF RECOMMENDATION

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NCPC File No. MP211



ST. ELIZABETHS

FINAL MASTER PLAN FOR THE DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION

2700 Martin Luther King, Jr. Avenue, SE
Washington, D.C.

Submitted by the General Services Administration

December 31, 2008

Abstract

The General Services Administration (GSA) has submitted a Final Master Plan for the Department of Homeland Security (DHS) headquarters consolidation at St. Elizabeths, located on Martin Luther King Jr. Avenue in Southeast Washington, D.C. The Final Master Plan would guide redevelopment of the St. Elizabeths West Campus and a portion of the East Campus for GSA to meet the operational housing needs for collocation of critical elements of DHS headquarters and five component agencies. The total development would relocate approximately 14,000 of the 26,000 DHS employees in the National Capital Region to the site, creating a secure federal campus with approximately 4.5 million gross square feet of office/support space plus and additional 1.5 million gross square feet of parking. The United States Coast Guard would be the first DHS component agency to relocate.

Commission Actions Requested by Applicant

Approval of the Final Master Plan for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths, pursuant to 40 U.S.C. § 8722 (b)(1) and (d).

Executive Director's Recommendation

The Commission:

Approves the West Campus portion and **comments favorably** on the Transportation Improvements and East Campus portion of the Final Master Plan for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths, as shown on NCPC Map File No. 83.00(05.00)42660, subject to the conditions set forth below:

Notes that the Final Master Plan is based on the Preferred Alternatives presented and analyzed in GSA's Final Environmental Impact Statement (FEIS) dated November 7, 2008; and includes mitigation outlined in GSA's Record of Decision. The Preferred Alternatives are the West/East Campus "Build Alternative 5"; Malcolm X Avenue, SE / I-295 interchange "Interchange/Access Road Alternative I-2"; and Martin Luther King Jr. Boulevard "MLK Avenue Alternative 2".

Notes that approval of the Final Master Plan is contingent upon GSA's ability to construct the west access road connecting Firth Sterling Avenue, SE to the modified Malcolm X Avenue, SE / I-295 Interchange, through the Shepherd Parkway.

Requires that GSA submit to NCPC for review and approval, an Amendment to the Final Master Plan for the Interchange/Access Road Improvements that includes the following:

- An environmental document that complies with the National Environmental Policy Act (NEPA), including a Record of Decision by the Federal Highway Administration with regard to the Malcolm X Avenue, SE / I-295 Interchange, and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency.
- Any modifications to the *Transportation Management Plan* resulting from ongoing analysis of the Interchange/Access Road Improvements.
- Any revisions to the concept design of the modified Interchange or Access Road as a result of NEPA or Section 106 consultation.

Requires that GSA take the following actions prior to commencement of construction to implement Phase I of the Final Master Plan. These actions are consistent with NCPC's Comprehensive Plan for the National Capital, GSA's mission and goals for this project as stated in the Final Master Plan, and GSA's Programmatic Agreement executed on December 9, 2008 to conclude Section 106 review for the Final Master Plan:

- Document that those portions of the Shepherd Parkway required for implementation of Phase II of the Undertaking are available for use; and, in collaboration with DHS and the National Park Service, initiate Section 106 consultation for roadway design in accordance with the Stipulations set forth in the Programmatic Agreement.
- Verify that it has submitted a Phase II prospectus authorization and funding request to Congress, consistent with federal requirements, in accordance with Stipulation I.B.1.c of the Programmatic Agreement, acknowledging that rehabilitation of historic buildings and landscapes in Phase II is essential to mitigate adverse effects to the National Historic Landmark.
- Establish a schedule for ongoing Section 106 consultation with Consulting Parties addressing the East Campus and any Phase I projects currently funded.
- Identify and implement, in collaboration with signatories of the Programmatic Agreement, opportunities and means for the public to have regular access to the Point, the Cemetery, and Hitchcock Hall.
- Collaborate with Consulting Parties and District of Columbia agencies to explore traffic, access and design alternatives for the setting at Gate #1, including follow-on Section 106 consultation in accordance with Stipulation III.C of the Programmatic Agreement; and continue to explore alternatives that designate Gate #2 as the primary entrance to the West Campus.
- Conduct additional Section 106 consultation to evaluate the feasibility of placing the Cemetery inside the secure perimeter of the West Campus, in accordance with Stipulation III.C of the Programmatic Agreement and in response to access concerns expressed by Consulting Parties.

Requires that GSA submit to NCPC for review and approval, an Amendment to the Final Master Plan for the East Campus portion of the DHS Headquarters Consolidation that includes the following:

- An environmental document that complies with the National Environmental Policy Act and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency. Evaluations shall include an assessment of the cumulative effects of the proposed plan in addition to other reasonably foreseeable development for the site and adjacent neighborhood.
- Any modifications to the *Transportation Management Plan* related to ongoing analysis of the East Campus portion of the Plan.
- A *View Shed Analysis* of the impacts of East Campus development, including road widening, on views to the East Campus from Martin Luther King Jr. Avenue, SE and from the Suitland Parkway.
- A *Summary of Planned Amenities*, describing shared use facilities that would be included in the East Campus portion of the proposed federal development that would also be available to the general public.
- A *Construction Staging Plan* that describes the timing, location, and impacts of construction staging areas on the East Campus.

Commends the General Services Administration, the Department of Homeland Security, and the District of Columbia for their collaborative efforts to meet the housing needs of the federal government; noting that the project has potential to provide financial benefits to the District as a result of federal leasing of approximately one million gross square feet of development on the East Campus, and to serve as a catalyst for development in Ward 8.

* * *

PROJECT DESCRIPTION

Background

The history of St. Elizabeths Hospital began in 1852, when Dorothea Dix, the advocate of modern treatment of the mentally ill, persuaded Congress to appropriate \$100,000 to build a model hospital for the treatment of the insane in Washington, D.C. The site, both east and west campuses, is a unique example of the mid-nineteenth century reform movement that sought to provide care for the mentally ill through the therapeutic qualities of physical design and environment. The Secretary of the Interior designated St. Elizabeths a National Historic Landmark (NHL) in 1991 for the national significance of the site and its exceptional value in illustrating the history of the United States; and for its association with important nineteenth and twentieth century social and humanitarian movements associated with the advancement of mental health care. St. Elizabeths is also associated with nationally significant leaders in the treatment of mental illness, and for its historic landscape features and collection of Collegiate Gothic, Italianate, and Renaissance Revival architecture.

The U.S. Department of Health and Human Services (HHS) and its predecessors controlled and operated St. Elizabeths from its founding in 1852 until 2004. In 1987, the East Campus was transferred to the District of Columbia, which continues to operate a hospital on the southern portion of that site. The West Campus hospital was in use until the early 1990s, at which time the hospital closed and patients were moved to the East Campus. In January of 2001, HHS

determined that it no longer had a need for the West Campus and declared the property “excess.” GSA took custody and control of the West Campus in December of 2004, and has stabilized the currently vacant buildings.

Faced with the need to consolidate 22 separate agencies among several locations into the recently formed Department of Homeland Security (DHS), DHS and GSA determined that the St. Elizabeths Campus would meet DHS’ need for a secure federal campus. By consolidating executive program leadership in a secure setting, DHS aims to facilitate communication, coordination, and cooperation across the Department, and achieve operational efficiency. The Final Master Plan for St. Elizabeths establishes a framework for a total development of 4.5 million gross square feet (gsf) of office/support space distributed among historic buildings and new construction, plus an additional 1.5 million gsf of parking. In response to the Commission’s comments on the Preliminary Master Plan (November 2007), NPS findings presented in their 213 report, Consulting Party comments, and comments received by GSA on the Draft Environmental Impact Statement (DEIS), Build Alternatives 1 and 2 (the two most adverse alternatives studied in the DEIS) were removed from consideration, and a fifth alternative (Build Alternative 5) was developed and evaluated in the Final Environmental Impact Statement (FEIS). Build Alternative 5 shifts approximately 1 million gsf of the total program from the West Campus to a privately developed, federally-leased facility on the north portion of the St. Elizabeths East Campus, and is the preferred alternative and serves as the basis for the building portion of the Final Master Plan.

The master planning process to develop St. Elizabeths has involved the client, GSA; the tenant, the U.S. Department of Homeland Security (DHS) including the U.S. Coast Guard (USCG); the design team; officials from local and federal agencies; the Section 106 Consulting Parties, made up of local and national organizations; and representatives of the local community. GSA has made public presentations and participated in numerous public meetings to provide periodic updates, outline issues, and solicit support. GSA has conducted numerous meetings with local Advisory Neighborhood Commissions (ANCs), the general public, and the Consulting Parties under the Section 106 process. The plan was developed concurrently with the National Environmental Policy Act Environmental Impact Statement (NEPA EIS) and National Historic Preservation Act (NHPA) Section 106 processes.

The goals of the St. Elizabeths Final Master Plan are as follows:

- Achieve the maximum build-out of the site for federal use, while maintaining the historic character of the West Campus;
- Provide facilities that meet the programmatic needs of DHS;
- Provide a workplace of world-class design created by the nation’s leading architects;
- Use federal development in ways that consider community development goals and efforts;
- Satisfy federal security requirements in a manner that remains sensitive to neighboring communities;
- Preserve, to a practicable extent, the natural context of the site;
- Promote sustainable development by achieving a “Silver” Leadership in Energy and Environmental Design (LEED) rating;
- Facilitate an open and inclusive process;
- Improve transportation access to the campus; and
- Optimize the federal investment.

The Site

The St. Elizabeths West Campus is located at 2700 Martin Luther King, Jr. (MLK) Avenue in Southeast Washington D.C. It is situated in the Congress Heights community in Ward 8 and overlooks Interstate 295, Bolling Air Force Base, the Anacostia Naval Annex, and the Anacostia River. The 176-acre site, situated 1.5 miles southeast of the U.S. Capitol, is bounded by MLK Avenue to the east, Barry Farm dwellings to the north, I-295 to the west, and The Shepherd Parkway and Congress Heights to the south (Figure 1).

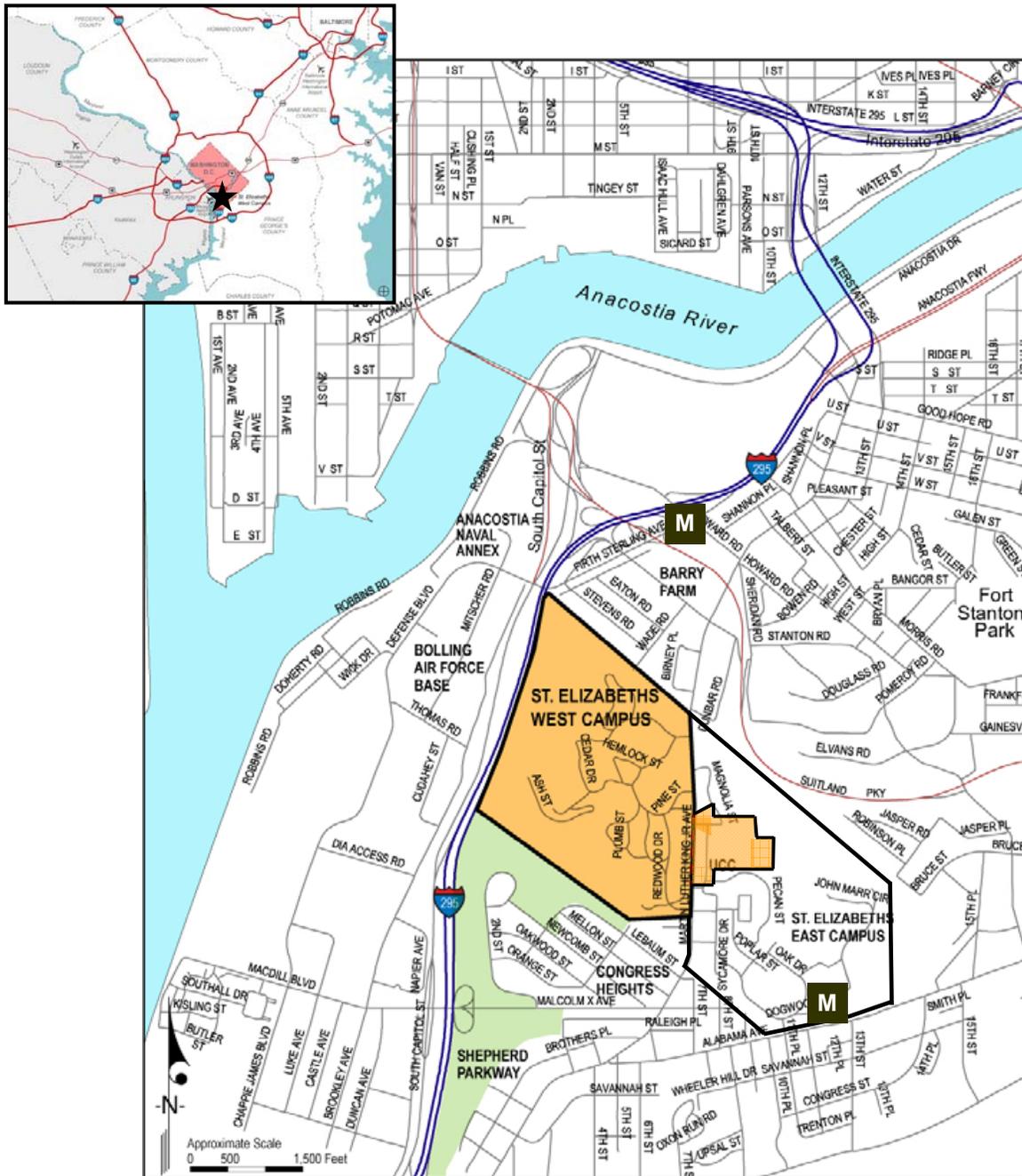


Figure 1: CONTEXT MAP

While the West Campus has been vacant for several years, the buildings and many landscape features still remain largely intact. There are 70 extant buildings located on the West Campus, 62 of which are identified as contributing to the National Historic Landmark. In all, the total building area is approximately 1.1 million gsf.

The East Campus, owned and operated by the District of Columbia, is located due east across MLK Avenue. The East Campus currently houses the St. Elizabeths Hospital on the south and the District of Columbia Unified Communications Center on the north. A Redevelopment Framework Plan prepared by the District was approved by the City Council on December 16, 2008; and envisions future development of the East Campus to include the proposed DHS facility as well as mixed-use development that would include retail and housing.

All major vehicular access routes leading to the vicinity of St. Elizabeths connect to either the Suitland Parkway or Malcolm X Avenue, SE. Public transportation services to/from the site include the Anacostia and Congress Heights Metrorail stations (approximately one-half mile north and one mile southeast, respectively) and several bus lines that run along the MLK Avenue corridor.

West Campus Topography

The St. Elizabeths West Campus is situated within the wooded, green topographic bowl (Figure 2) – the bluffs that surround the L’Enfant-planned capital city – and is visible from prominent locations in and around the city. The topography of the campus is characterized by a generally flat, upper-level plateau with adjacent steep slopes and ravines to the west and north. As a result, the site offers panoramic views of the Anacostia and Potomac Rivers and of Washington D.C. and the Virginia shore.

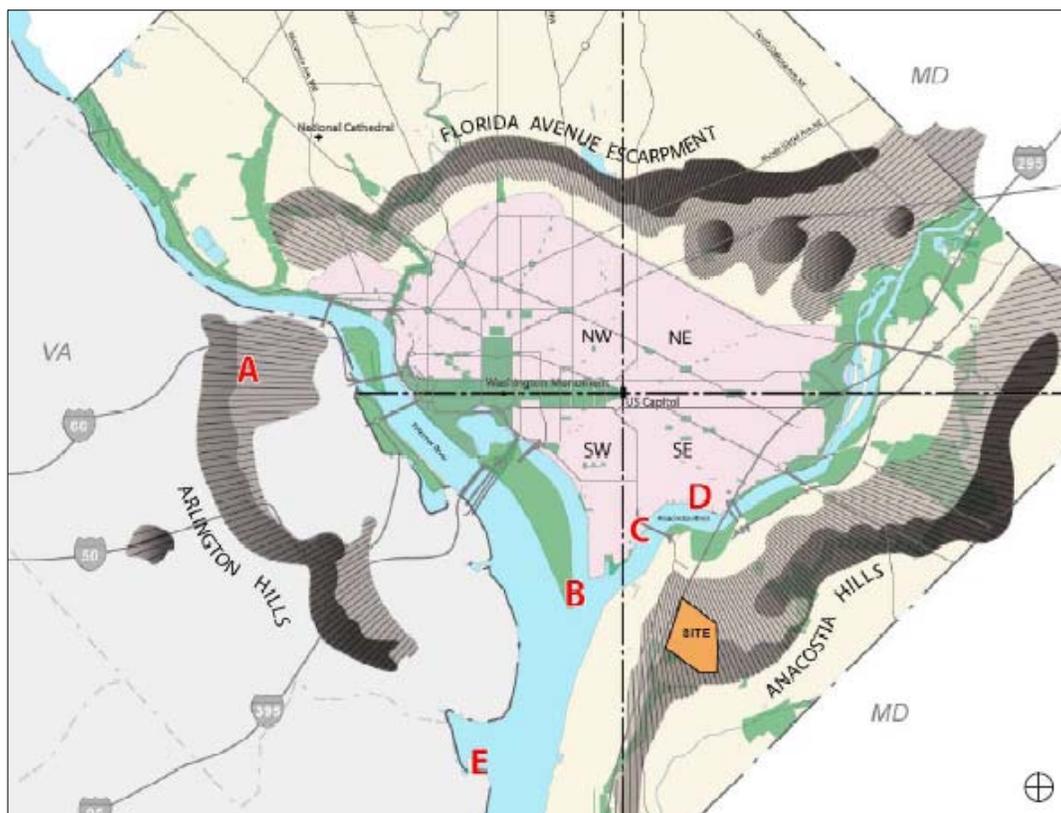


Figure 2: TOPOGRAPHIC BOWL

East Campus Topography

The majority of the East Campus is characterized by a relatively flat plateau area, with steep slopes on its eastern edge. While the North Campus portion of the East Campus is not visible within the topographic bowl, it is visible from the Suitland Parkway, a National Park Service (NPS) property located to the northeast.

Project Area

The project area for St. Elizabeths Final Master Plan (Figure 3) includes the entire West Campus, a portion of the East Campus (District of Columbia property), including land needed to widen MLK Avenue, and a portion of the Shepherd Parkway (NPS property) through which GSA proposes to build a new west access road.



Figure 3: PROJECT AREA

Program Requirements

The Department of Homeland Security (DHS) has a programmatic need to consolidate and house on a secure federal campus the critical elements of its headquarters, including the Office of the Secretary, and five component agencies: the Transportation Security Administration (TSA), Customs and Border Protection (CBP), Immigration and Customs Enforcement (ICE), the Federal Emergency Management Administration (FEMA), and the United States Coast Guard (USCG). The new facility is expected to house approximately 14,000 DHS employees and an additional 250 support staff to maintain the physical plant and the various shared use functions in a combined space program of approximately 4.5 million gsf of office/support space plus an additional 1.5 million gsf for parking. The total 6.0 million gsf can be categorized as follows:

- 3,553,450 gsf of office space for the critical elements of DHS
- 424,200 gsf for systems support/operational/utility infrastructure
- 315,000 gsf for the National Operations Center and related screening facilities
- 207,350 gsf for employee services and amenities (i.e., daycare, bank, cafeteria, etc.)
- 1,500,000 gsf for employee and visitor parking

Standard hours (generally, 9:00 am to 5:00 pm) would be worked by the majority of the workforce, but approximately 1,137 shift workers would ensure that a Level V secure environment would be maintained at all times.

PROPOSAL

The General Services Administration has submitted a Final Master Plan for the DHS Headquarters Consolidation at St. Elizabeths. The Plan is comprised of three separately bound documents: the “Master Plan,” the “Preservation, Design and Development Guidelines” (Design Guidelines), and the “Transportation Management Plan” (TMP). It is worth noting that the Design Guidelines apply only to the West Campus portion of the program, and a planning document will be prepared for the North Campus development parcel on the East Campus as the project moves forward.

Planning Principles

In response to site analysis, the design team developed the following planning principles that informed the development of the Final Master Plan and served to guide the location, orientation, and massing of new construction:

- *Site Parcels:* Respect the individual and unique character and history of each site parcel in making redevelopment decisions.
- *Campus Structure:* Retain, preserve and enhance site elements and spaces that define the existing site character.
- *Development Density:* Locate new development density on site to respect the character of and relationships among the historic resources.
- *Planning Relationships:* Organize programmatic elements on site to maximize operational efficiency and effectiveness.
- *Building Reuse:* Protect, preserve and reuse the historic resources of the National Historic Landmark.
- *Landscape:* Integrate historic landscape and natural features into the master plan.
- *Views:* Maintain and enhance historic views from and within the site, as well as valuable non-historic views from outside the site.

- *Site Access:* Respect and reinforce the historic address for the site on Martin Luther King Jr. Avenue.
- *Circulation:* Use historic roadways and paths to reinforce spatial continuity.
- *Parking:* Locate parking at the site perimeter to preserve a pedestrian-oriented site, consistent with historic precedent.
- *Site Environment:* Develop landscape responses that respect the inherent distinctions between different zones of the site while preserving the historic context and restoring ecological functions.
- *Site Infrastructure:* Centralized site utilities for security, redundancy and operational efficiency; and consolidate site utilities and below grade distribution to minimize impact to the historic landscape.
- *Security:* Assure the safety and security of the site's occupants and activities while maintaining an appearance of an open, accessible site that is compatible with the and a good neighbor to the surrounding community; and accommodate limited controlled public access to the historic and culturally important aspects of the site.

With the existing conditions information, program information from DHS, and the framework of the planning principles, a number of concept alternatives were developed for analysis during the environmental and historic preservation (NEPA and Section 106) review processes. These alternatives were evaluated based on how each accommodated the required program, met the needed functional organization, and impacted the historic and cultural resources of the NHL. Three-dimensional massing models of the alternatives were created in order to test views from the neighboring community and beyond, as well as within the campus. The selected alternative was presented and analyzed as "Build Alternative 5" in the Final Environmental Impact Statement (FEIS); and additional transportation improvement alternatives were also analyzed and are discussed later in this report.

The Master Plan

Of the three Build alternatives included in the FEIS, GSA has identified Build Alternative 5 as the preferred alternatives for the DHS Headquarters Consolidation at St. Elizabeths; this alternative accommodates the total program, divided between the West and East Campuses, and forms the basis of the Final Master Plan. Build Alternative 5 meets DHS' programmatic requirements with regard to space, adjacency, and functionality of the adaptively reused historic buildings, while including steps to minimize harm to the historic qualities of the site, as required by Section 110 of the National Historic Preservation Act. The main aspects of the Final Master Plan are as follows:

West Campus (also refer to Figure 4 for Illustrative Site Plan)

- 4 million gsf office/support space + 1 million gsf parking (3.02 million gsf above grade)
- Preservation, to the maximum extent possible, of Landscape Units 1 and 2
- Removal of 11 contributing structures (8 greenhouses, 2 buildings)
- Preservation of significant open spaces
- High density development area on west edge of the Pavilion site
- Large structure on west edge (Warehouse site) for USCG building
- Below-grade parking at northeast corner of West Campus
- Above-/below-grade parking structure in ravine on west side of campus
- Limited building heights to avoid penetrating the ridgeline of the topographic bowl

East Campus (also refer to Figures 14 and 15)

- 750,000 gsf office/support space + 250,000 gsf parking
- Federally-leased facilities from a private developer

Since the East Campus portion of the plan was introduced later in the planning process, in part to minimize density on and impacts to the West Campus, that portion of the plan will require additional NEPA and Section 106 reviews, to be initiated following the Commission's review of the current Master Plan, and anticipated for completion by early 2010.

The Final Master Plan also includes transportation improvements for modifications to the Malcolm X Avenue, SE / I-295 interchange and west access road to reach Gate 4 of the West Campus (I-0 through I-4) and two alternatives to modify Martin Luther King, Jr. Avenue (MLK-1 and MLK-2) to provide a dedicated turn lane turn into the West Campus and to improve the avenue in accord with the District's "Great Streets" initiative. These alternatives are described in the *Vehicular Access* section of this report (see page 15).

Building Density

The Final Master Plan includes the reuse of as many of the existing buildings as is possible, and locates new development density to respect the character of and relationships between the historic resources on the site. Landscape Units 1 and 2 are altered the least, with new construction of moderate and medium density located at the perimeter of the built areas of the site (Figure 5). Low density development is planned to be for much of the existing landscaped areas and with the goal to minimize visual impacts to the NHL as well as to regional views within the topographic bowl.

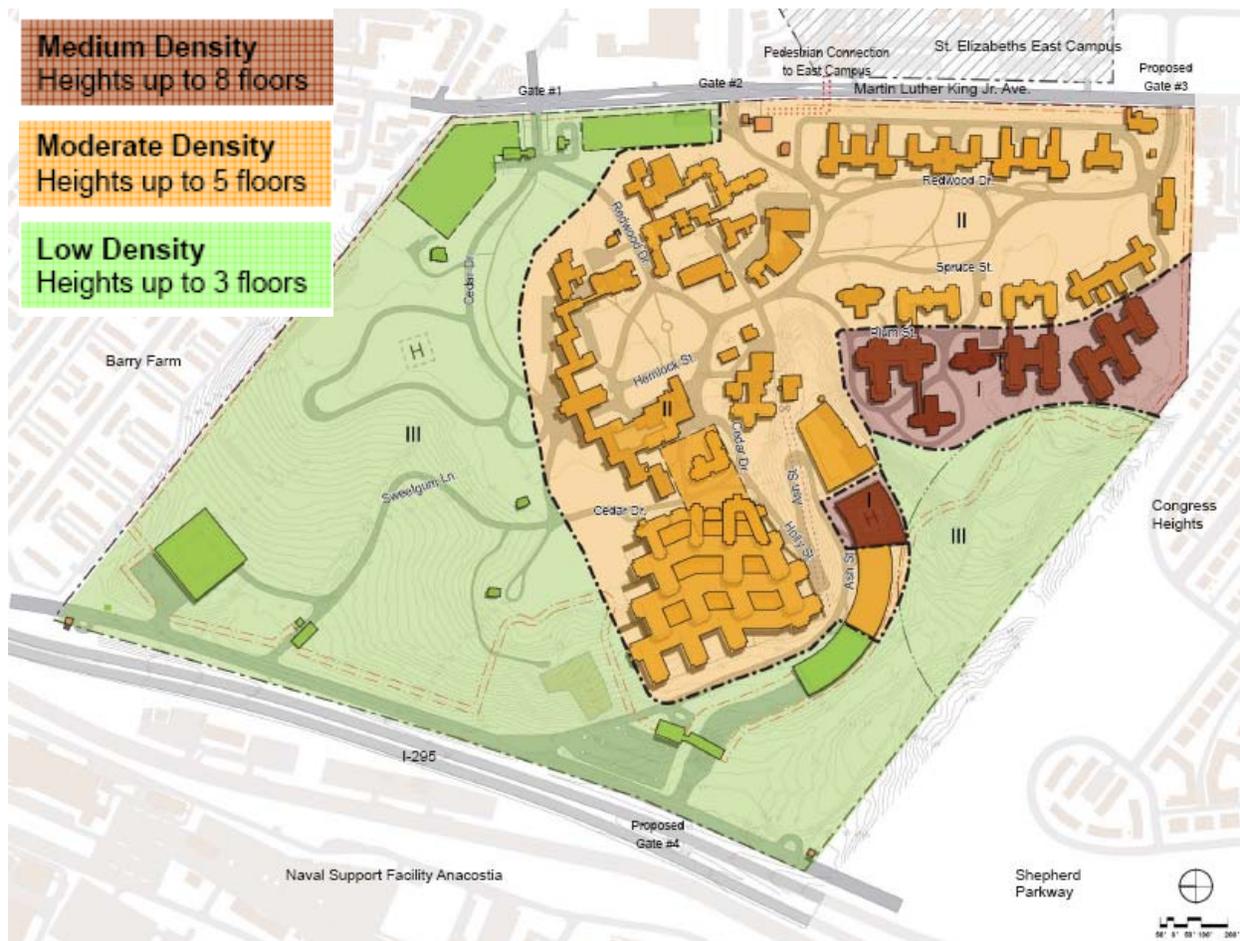


Figure 5: BUILDING DENSITY

In order to meet the height limits associated with each density level, keep building elevations below the top of the Center Building, and to reduce the footprint of new construction, below-grade construction is provided where feasible. Parking structures are largely below grade, and office buildings would use courtyards and other siting techniques to provide additional area for occupiable space while limiting visual impacts within and to the campus. This approach is especially critical for the USCG building design in order to minimize its visibility on the western slope of the site (Figure 6). This approach is a major contributing factor in reducing the total above-grade area of the west campus portion of the Final Master Plan. It is anticipated that approximately two-thirds of the USCG building would be located below the virtual grade, reducing the above-grade construction of the West Campus development to approximately 3.02 million gsf.

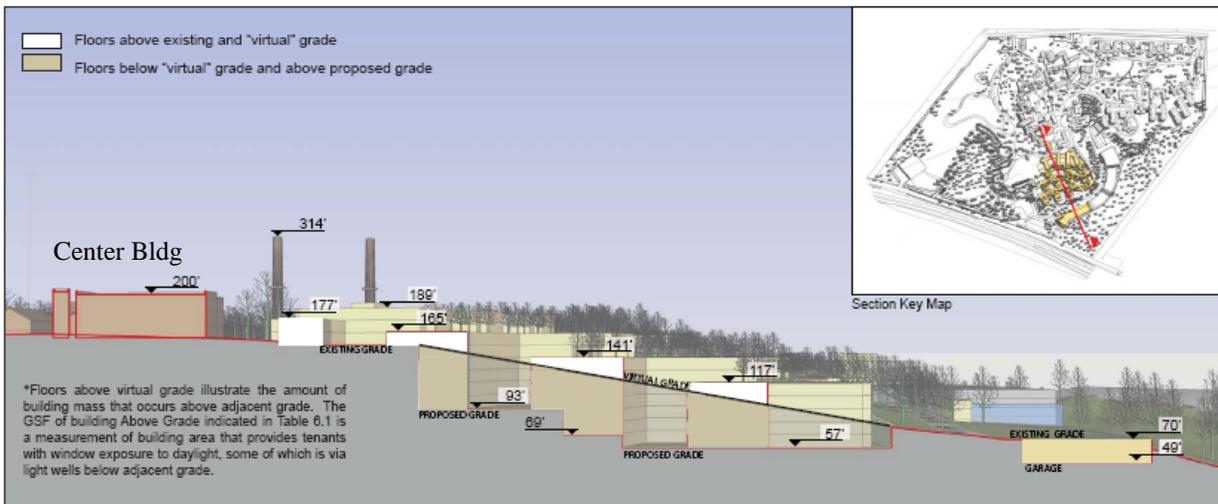


Figure 6: SITE SECTION (at U.S. Coast Guard Building)

Landscape

Guided by the *St. Elizabeths Hospital West Campus Cultural Landscape Report* and the Planning Principles of the Final Master Plan, the Landscape Plan (Figure 7) takes into consideration the full range of distinct landscapes on the site, from mature woodland to meadow; from broad lawn spaces with specimen trees to intimate courtyards and gardens. Several significant open spaces remain free of construction, including the areas north and south of the Center Building, The Point, the lawn areas west of the “Letter” buildings, and remnants of mature historic woodland. Significant landscape features, including the masonry perimeter walls, the Cemetery, and several historic specimen trees would be retained, and the existing woodland would serve as a source of biological memory, informing and providing genetic materials for the gradual restoration of the balance of the woodlands on site. Diversity in the herbaceous, under-story and canopy zones of the site would be reestablished by removing alien plants.



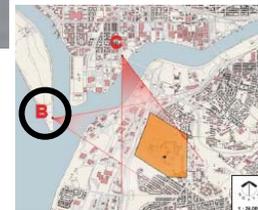
Figure 7: LANDSCAPE PLAN

Views and Vistas

Reciprocating views and vistas are an integral and defining component of the NHL; and the Final Master Plan includes photo-simulations of the proposed development to, from, and within the site (Figure 8). The development of computer and scale models, in addition to photo-simulations, were used by the development team to evaluate how proposed development would impact views to, from, and within the St. Elizabeths' West Campus, as well as to guide the placement of proposed new construction. Primary views from the Point over the Potomac and Anacostia Rivers would be protected, and external regional views from five key locations were identified and analyzed to guide the proposed development.



View from Hains Point



View from South Capitol Street

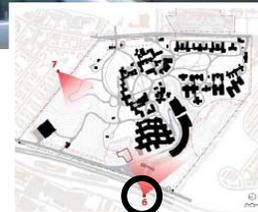


Figure 8: VIEWS AND VISTAS

Environment

A significant result of site development is the resulting increase in impervious surfaces, and the effects it has on the watershed, site hydrology, and downstream waterways. The goal for stormwater management at the St. Elizabeths West Campus is to minimize the environmental impacts of new development, and to also mitigate problems caused by past development. Flooding of waterways downstream of the site is not a major concern, but one goal is to improve the water quality of the Anacostia and Potomac Rivers, the Chesapeake Bay, as well as on-site water courses. Changes to site hydrology can improve water quality by filtering runoff through plants and increasing infiltration of rainwater to help recharge groundwater and provide a more steady flow of water for on-site springs, seeps, and streams. Runoff from impervious surfaces would be managed for water quality as close to where rain falls as possible. A minimum of the first half inch of rainfall should be managed for all events; however a more aggressive goal of 1.5” would allow buildings on the site to meet LEED (credit 6.1) by managing over 90% of the average annual rainfall.



Figure 9: ENVIRONMENT / STORMWATER MANAGEMENT

In addition to environmental design for stormwater management, LEED Silver certification is expected for all building renovations and new construction. Incorporation of green roofs, bioretention zones, and other sustainable design elements is anticipated (Figure 9), and will be explored further as individual design projects are undertaken.

Vehicular Access

The existing regional transportation network does not provide adequate direct vehicular access to the St. Elizabeths campus, and significant modifications or additions to the roadways would be required to accommodate the projected traffic increase. Current automobile routes to the site are either from Interstate 295 or the Suitland Parkway, and then via local roads to the entrance on MLK Avenue. According to the FEIS, current local roadways are already congested and this project combined with other planned community developments for Ward 8 would significantly challenge the transportation network.

The Final Master Plan takes into account GSA’s plan (with District approval, and in conjunction with the District’s “Great Streets” Initiative) to widen MLK to the east. The preferred alternative, as studied in the FEIS, includes widening the Avenue to create a dedicated turn lane into the West Campus, while also creating a more pedestrian-friendly environment with landscaping and wider sidewalks. Gate 1 would be modified interior to the site to accommodate the 30% of arriving employee vehicles, but no widening of the historic wall opening is proposed; this area is also anticipated to accommodate a shuttle drop-off area as well as vehicular screening equipment. Gate 2 would be modified to accommodate screening for all visitor arrivals. The Plan proposes creating a new access road (Figure 10) along the western edge of the site to connect the modified Malcolm X Avenue, SE / I-295 interchange and Firth Sterling Avenue, leading to a new employee entrance (Gate 4) as well as a service/delivery entrance (Gate 5). The west access road would accommodate 70% of arriving employee vehicles as well as truck deliveries, and while not available to the public, would allow for limited public access to the Cemetery.



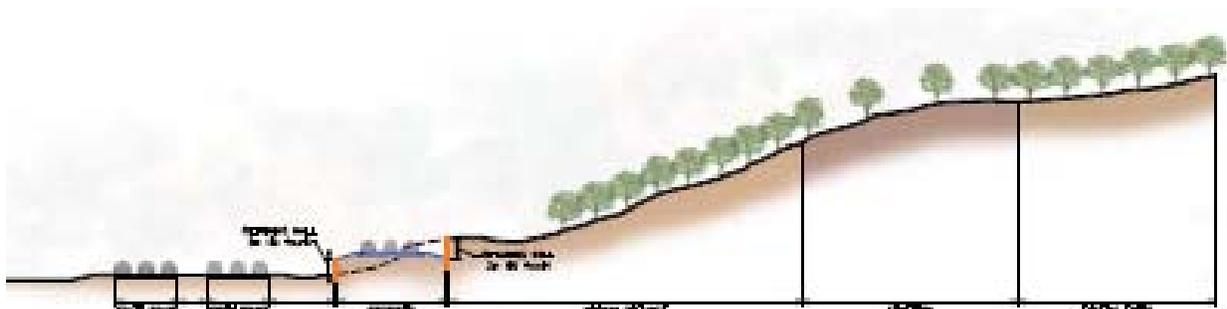
Warehouse Delivery



Truck Inspection



Gate 4 Entrance



Site Section

Figure 10: WEST ACCESS ROAD

The Transportation Management Plan anticipates arrival and departure statistics included in the Final Master Plan. Approximately 36 percent of St. Elizabeths employees would arrive at the campus during the AM peak hour of adjacent roadway traffic and approximately 25 percent of St. Elizabeths employees would depart from the campus during the PM peak hour of adjacent roadway traffic. The peak hours of traffic in the vicinity of St. Elizabeths are 7:00 am to 8:00 am and 4:45 pm to 5:45 pm. Standard hours (generally 9:00 am to 5:00 pm) would be worked by the majority of the workforce, but approximately 1,137 shift workers would ensure that the Level V secure environment would be maintained at all times.

Internal Circulation

Consistent with the stated Planning Principles and the Design Guidelines, the Final Master Plan builds upon the existing historic paths to reinforce spatial continuity and a pedestrian-friendly environment within the West Campus. Historic pathways that are currently in place would be rehabilitated and serve as internal circulation for both pedestrians and shuttles (Figure 11). The placement of parking at the perimeter and the restriction of vehicular circulation to internal shuttles and special-permission vehicles would preserve the pedestrian nature of the campus. The majority of facilities on the West Campus can be reached within a five-minute walk, and a planned pedestrian tunnel (Figure 14) would connect the West and East Campuses.

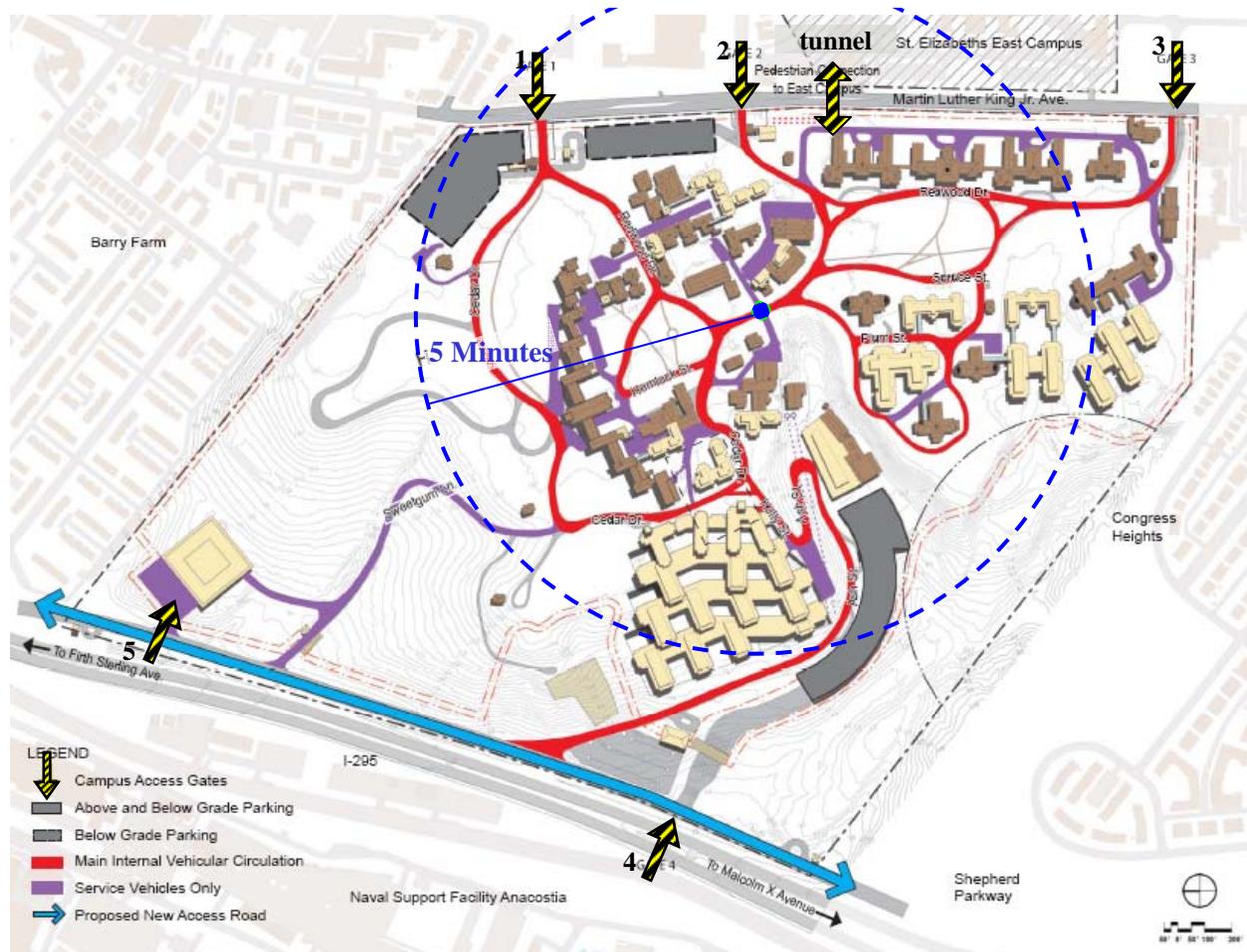


Figure 11: SITE CIRCULATION

Parking

Parking for employees and visitors to the West Campus would be provided in garages that would be directly accessed from Gates 1, 2 and 4. Parking structures would be located below grade and away from sensitive historic resources to the extent possible, and would be screened and buffered to minimize visual impacts. Parking on the West Campus would be limited to perimeter areas of the site, due to both security and transportation considerations; and located either underground or in the ravine to minimize impacts to views from within the West Campus as well as to views from outside the site. Parking for the East Campus program has not yet been located, but the parcel would include a parking structure that is physically separate from the office building.

The maximum number of employee parking spaces would be 3,594 to accommodate the 14,000 DHS employees on the site (East and West Campuses). The plan provides parking spaces at a ratio of 1 parking space per 4 employees (1:4) for the majority (12,863) of employees, and 1 parking space per 3 employees (1:3) for 1,137 shift employees. Shift employees are afforded a higher parking ratio due to their variable schedules, their need for flexibility to arrive/depart on short notice, and the lack of other modes of transportation readily available during their work hours. There would also be 640 parking spaces for visitors located entirely on the west campus.

Transportation Management Plan (TMP)

GSA has prepared a TMP that addresses existing and proposed site access and roadway networks, vehicular circulation, transit and pedestrian facilities, planned developments and improvements, and intersection capacity analyses. Informed by additional traffic and transportation analyses included in the FEIS issued November 7, 2008, the TMP includes various transit and road improvements, as well as Transportation Demand Management (TDM) strategies that effectively allow DHS to meet the planned employee parking ratio of one vehicle for every 4 employees (1:4), in accordance with the Comprehensive Plan recommendations for federal facilities within the historic District of Columbia boundaries.

The TMP outlines aggressive goals to reduce the number of single occupant vehicle trips to the site (through alternative modes of transportation as well as limiting employee parking), to reduce traffic congestion, and to improve air quality. The most significant of those goals include the following, and Table 1 (*next page*) provides a summary of GSA's commitments to all TDM measures included in the TMP:

- Metrorail and public transit use by 35% - 42% of employees (encouraged by transit subsidies as well as shuttle service)
- Reduction in SOV trips, from current use of 36% to 17% with implementation of the TMP
- Car/vanpooling, with designated parking, by 16% of employees
- Alternative and flexible work schedules
- Remote parking area, to encourage use of agency park-and-ride (shuttle) and/or express buses
- Roadway/site access improvement, including widening of MLK Jr. Avenue to provide designated turn lanes
- Advocate for a new Metro stop and additional access from Suitland Parkway to serve both the East and West Campuses – a joint commitment by GSA, DHS, and the District (per MOA related to East Campus program)
- Continued coordination by GSA and DHS with FHWA, DDOT, and MWATA in order to successfully implement the TMP

Table 1: TDM Measures (summary)

TDM Measures	DHS Commitment	Planned Time Frame*
General	Hire Employee Transportation Coordinator (ETC) – to implement, market, and monitor the TMP.	DHS hired an ETC in October 2008.
	ETC will encourage use of Commuter Connections.	Phase I
Parking Management	Distribute parking spaces/parking permits on Campus.	Phases I, II, III
	Provide internal shuttle service to connect parking facilities to key locations around the campus subject.	Phase I
Carpooling Incentives	Preferred carpool/vanpool parking spaces.	Phases I, II, III
	Carpool ride-matching program – ETC will help determine employees with similar travel routes using an electronic database, and market program.	Phase I
	Convenient drop-off areas for carpoolers @ Gates 1 and 4.	Phases I, II, III
Metrorail Incentives	Monthly Transit Subsidy (35% of employees to use Metrorail + 7% to use Metrorail via commuter rail).	Phases I, II, III
	Agency Shuttle – External shuttle from Anacostia station.	Phase I
	Regional Planning and Transportation Agency Coordination – including Metro station on East Campus (in coordination with WMATA, GSA, and DC).	Phases I, II, III
	The ETC to work with WMATA to coordinate Metrobus service from the Anacostia Station to the campus.	Phase I
Commuter Bus	Coordinate with bus companies to provide stop at Gate 4.	Phase I
Metrobus	ETC to work with WMATA to determine if changes in existing routes could improve service to the campus.	Phase I
	ETC to market use of Smart Commute™ Initiative, rewarding employees for choosing a home close to public transit.	Phase I
Bicycle	ETC to distribute bike route information.	Phase I
	ETC to coordinate with DDOT and regional transportation authorities to encourage improved and new bicycle facilities.	Phase I
	Provide shower/locker room facilities on campus.	Phase II
	Provide secure bicycle storage on campus (in garages).	Phase I
Walk	ETC to promote regional incentive programs that encourage home ownership close to work.	Phase I
AWS	Continue to offer alternative work schedules to employees, distributed throughout all days of the week.	Phase I
Agency Telework Center	Develop telework policy; coordinate with GSA to establish center(s) for employees to work at part of work week. Goal to accommodate approximately 560 employees.	Phase III
Walk from Home	Develop work from home policies for certain employees and functions.	Phase I
Agency Park-&-Ride (agency shuttle)	Consider remote parking facilities (in Maryland and Virginia) and provide contracted shuttle to/from campus. Coordinate locations with Agency Telework Center locations.	Phase III

TDM Measures	DHS Commitment	Planned Time Frame*
Flex Car	Consider provide flexible car parking on campus (outside secure perimeter) for employee errands or emergencies.	Phase II
Amenities	Provide amenities on-site, to allow for greater participation in carpooling and transit programs.	Phase II
Guaranteed Ride Home	Coordinate with MWCOG to encourage employees to enroll in free program.	--
Information Express Kiosks	Coordinate with Commuter Connections to encourage employees to register for programs through regional network of touch-screen interface kiosks.	--

* Phase I (2013), Phase II (2014), Phase III (2016)

Perimeter Security

The site perimeter consists of several elements, including a perimeter fence, a security double fence, a security setback zone, and surveillance equipment and alarms. The DHS campus requires security of the highest level (Figure 13). The entire secure area of the site would be enclosed by a fence or existing historic walls that mark the property boundaries, with the exception of the western boundary, where the fence would be located along the inner side of the new access road. A double fence would enclose the entire campus, and would be separated by a 20-foot zone to remain clear of significant vegetation; however, the tree canopy is expected to grow over the clear area, making the fence line less visible over time (Figure 12). There would be a security setback of 100 feet where conditions on the exterior of the fence allow for vehicular proximity, and a setback of 50 feet where conditions preclude vehicular proximity, such as a vegetated hillside. The fencing, gates and other perimeter security elements would be designed to maintain an appearance that is open and accessible; and would include a decorative outer fence and a less ornate no-climb design on the interior.

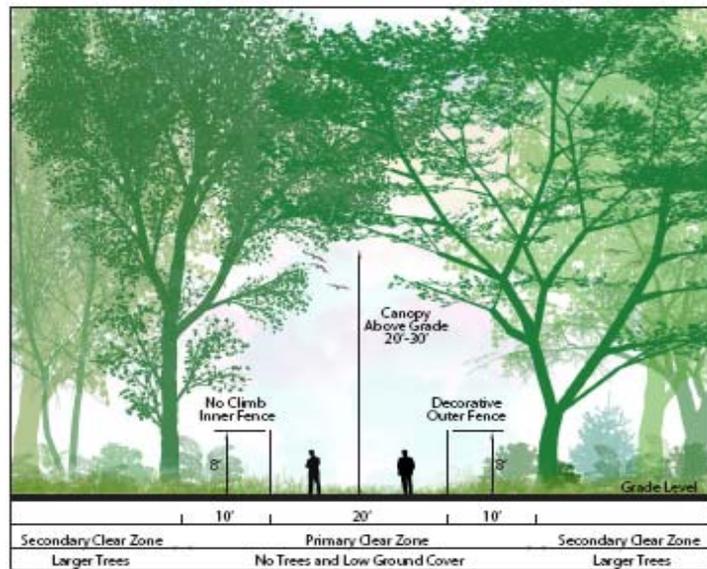


Figure 12: PERIMETER FENCE SECTION

Vehicle barriers would be installed at entry points and each building would have its own secure entrance with screening area. A delivery screening facility would be located near the northwest corner of the site, and accessed via Gate 5 from the planned west access road.



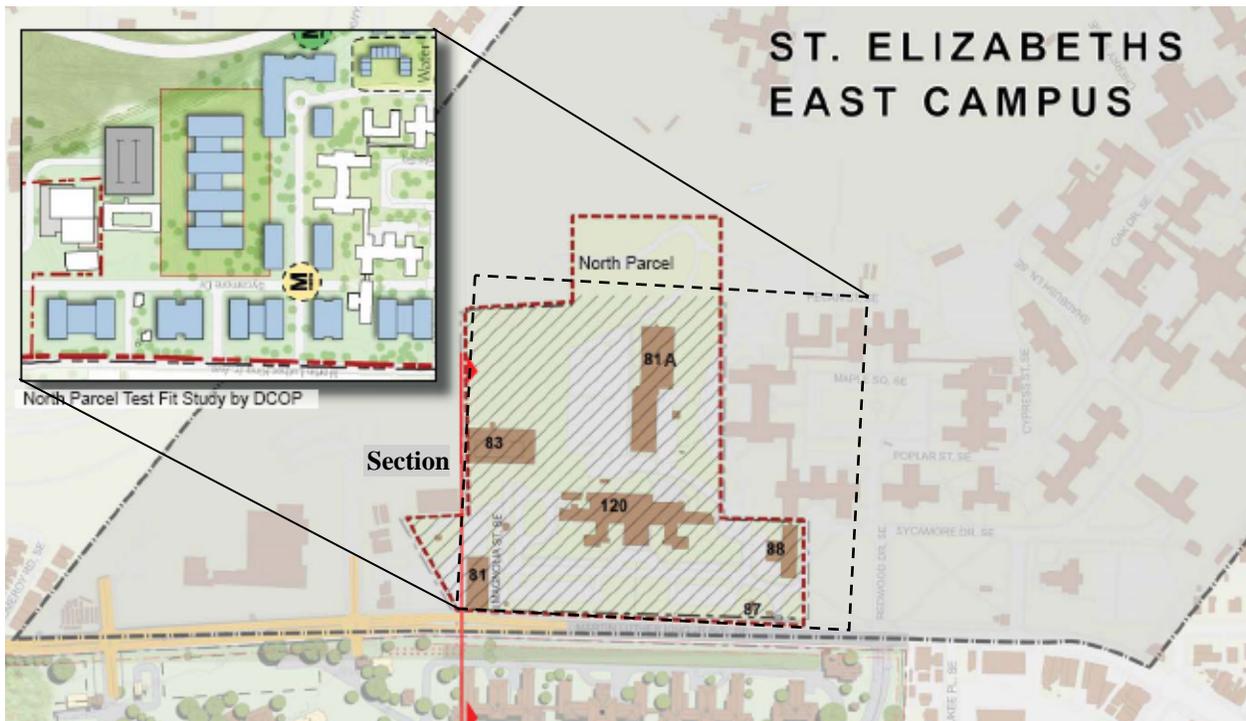
Figure 13: PERIMETER SECURITY

East Campus

The East Campus portion of the program has been evaluated at the programmatic level and is planned to accommodate a single DHS component and associated parking (Figure 14). The program would require 750,000 gsf of office/support space, plus 250,000 gsf of parking. The facilities would also meet the ISC Level V security criteria, and would be connected to the West Campus through an underground pedestrian tunnel located below MLK Jr. Avenue.

The District’s “St. Elizabeths East Campus Framework Plan” (Figure 15) incorporates the proposed facility, which is intended to be privately developed and leased by the federal government. Through the community update process, the Office of Planning will engage stakeholders in developing additional guidance for the future development of the East Campus, and the plan will be developed to include broad vision and development principles for the creation of new neighborhoods, an implementation plan for infrastructure, an approach to improve multi-modal transportation connectivity and access, a commitment to historic preservation and adaptive reuse, and a strategy for sustainable development.

GSA is prepared to continue with NEPA and Section 106 processes for the East Campus portion of the plan immediately following NCPC review of the Final Master Plan. GSA will also coordinate with the District of Columbia to explore alternatives for including publicly-accessible shared uses (amenities) on the federally-leased parcel.



East Campus – Site Plan & Test Fit



Section: East/West Campus Connection

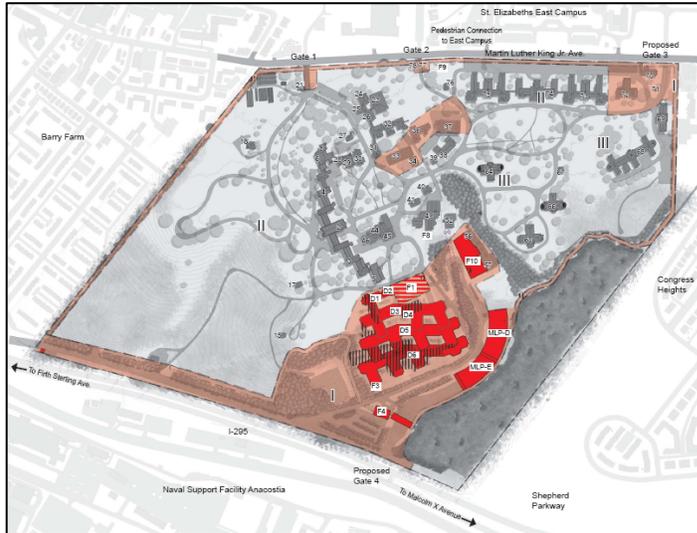
Figure 14: EAST CAMPUS - SITE and TEST FIT



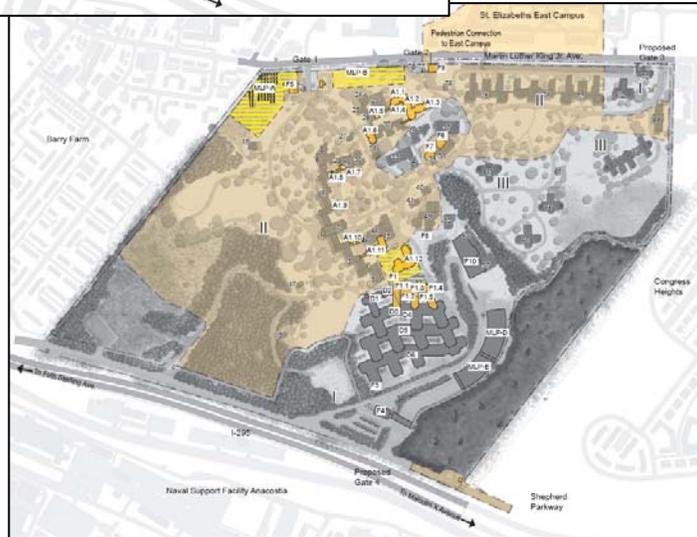
Figure 15: EAST CAMPUS REDEVELOPMENT FRAMEWORK PLAN (DC)

Phasing

The Final Master Plan is expected to be implemented in three phases (Figure 16) lasting a period of eight years. The initial phase (Phase I), planned to commence in 2009, would include all the necessary functional spaces and infrastructure to fully support the USCG on the site, including associated parking in the west ravine parking garage. The core components of the campus infrastructure for both utilities and security would need to be completed as part of the first phase. In anticipation of the full development, the first phase would include both administrative and support functions, though the full array and capacity of support facilities for the entire campus population may not be in place until later phases. The basic perimeter security for the site would be completed as part of the first phase to ensure that the first DHS component would operate within a fully compliant security campus. The portion of the west access road connecting Firth Sterling Avenue and Gate #4 would be constructed during Phase I.



Phase I



Phase II



Phase III

Figure 16: PHASING PLAN

Phase II of development would commence as the first phase is being occupied, and would include DHS Headquarters and the National Operations Center (NOC) on the West Campus, and other DHS component functions on the East Campus. The East Campus construction would also include a below-grade connection between the two campuses near Gate 2. Phase II would include completion of infrastructure facilities and distribution systems, additional sections of the west ravine parking garage, underground parking structures near Gates #1 and #2, support facilities, perimeter security elements, the portion of the west access road through The Shepherd Parkway, and the interchange modification at Malcolm X Avenue, SE (coordinated with the Federal Highway Administration and DDOT). The majority of historic rehabilitation would occur in Phase II.

Phase III, the final phase of development, would establish the headquarters for Transportation Security Administration, Customs and Border Protection, and the Immigration and Customs Enforcement. This phase would also see completion of the screening facility, the last section of the west ravine parking garage, and landscaping rehabilitation and restoration.

PRIOR COMMISSION ACTION

The Commission provided comments on the Draft Master Plan in November 2007. Staff review of that document included the identification of five primary impact categories: View Sheds, Transportation, Community Benefits, Historic Preservation, and Environmental Sustainability. Staff's analysis of each identified measures to minimize and/or mitigate the effects of some aspects of the proposed designs. The Commission also required GSA to study an alternative that limited above-ground construction to 2.5 million gsf.

In summary, the comments for the Draft Master Plan focused on the potential benefits of reducing density of development to reduce the amount of loss of historic fabric on the West Campus, reducing parking to meet the Comprehensive Plan parking ratio of one car for every four employees (1:4), development of a TMP that would identify strategies to reduce impacts on the existing and planned transportation network, identification of opportunities for sustainable design, and consideration of shifting a portion of the program to the East Campus to both minimize impacts to the West Campus and to spur economic development in the Ward 8 community. Commission comments on the Draft Master Plan also focused on continued coordination to provide public access to the Point and the Cemetery.

The Final Master Plan submission responds fully to the Commission's comments, including the requirement to modify the Master Plan to include one or more alternatives with less than or equal to 2.5 million gsf of build-out above ground to mitigate or minimize the major, long-term, adverse impacts to the West Campus of St. Elizabeths. While GSA studied this alternative (Figure 17) and included it as an Appendix in the Final Master Plan, they determined that the alternative did not meet the purpose and need for the DHS Consolidation and eliminated it from further study in the FEIS. It is worth noting, however, that this alternative was used as the basis, along with the Section 213 report and other comments received at the Draft Master Plan stage, to generate the Build Alternative 4 revisions as well as the new Build Alternative 5 studied in detail by GSA in its FEIS.



Figure 17: 2.5 MILLION GSF ABOVE-GRADE ALTERNATIVE

PROJECT ANALYSIS

The Final Master Plan for the DHS Headquarters Consolidation at St. Elizabeths presents a complete framework for development on the West Campus and a programmatic level of development of the East Campus portion of the Plan. The overall proposal is responsive to the prior Commission comments as well as to extensive feedback provided by Section 106 consulting parties, District of Columbia and other affected federal agencies, local organizations, groups, and individuals.

The Plan is well developed and rational in its proposed re-use of historic buildings, new construction, site/infrastructure work, and landscape treatments; staff supports the Plan's stated requirements to meet the Secretary of the Interior's Standards for Treatment of Historic Properties and Cultural Landscapes, as well as Historic Preservation Professional Qualification Standards. Staff recommends that the Commission approve the West Campus portion of the Final Master Plan, and comment favorably on the East Campus portion of the Final Master Plan for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths.

The proposed project is the result of a multi-year planning process, which has brought together the federal and District governments, affected agencies, local business owners, and neighborhood residents. Ongoing consultation has resulted in a balanced approach that meets the programmatic needs of the applicant, retains a large federal agency within the District of Columbia, and strives to minimize harm to the National Historic Landmark. Staff finds that the broad goals and policies of the Federal Elements for the Comprehensive Plan have been met, with only a few exceptions that have potential to be resolved through ongoing Section 106 and design consultations. (*Refer to the CONFORMANCE section of this report, beginning on page 30, for more in-depth analysis of the Comprehensive Plan.*)

Issues

Staff has identified six issues that are sufficiently addressed at the master planning stage, but will require further development as implementation of the Final Master Plan is initiated and individual projects are undertaken. Those issues deal primarily with the proposed construction of the west access road for the West Campus, GSA's ability to implement the full plan without major interruption, ongoing Section 106 consultation, public access to the West Campus, designs for the West Campus perimeter and Gate 1 entrance, and next steps to develop a detailed Master Plan Amendment for the East Campus portion of the project.

West Access Road

GSA studied several alternatives to access the site, and determined that the west access road through the NPS Shepherd Parkway was the most feasible and prudent alternative. Since the Shepherd Parkway has been determined a 4(f) property, the FHWA is taking the lead to complete ongoing evaluations. In their 4(f) evaluation issued on December 4, 2008, FHWA evaluated GSA's preferred transportation improvement Alternative I-2, and determined that there is no possible alternative to improve the interchange without taking land from a Section 4(f) resource. Environmental analysis has been completed for the transportation improvements, and a Record of Decision for this portion of Volume II of the Final EIS is anticipated in March 2009.

Staff finds that the analysis conducted as part of the FEIS to be comprehensive, and notes that the proposed access road and interchange modification would require the use of a small portion of the total land area of the Shepherd Parkway (the FHWA 4(f) evaluation states that a total of 4.4 acres of land from the Shepherd Parkway would be required for permanent transportation improvements, and a total of 6.0 acres are needed for temporary construction and drainage improvements, resulting in a reduction in land area of approximately 2.1 percent). Although only a small area of the Shepherd Parkway would be required, staff recognizes the potential impacts that would result to the National Register property and supports ongoing collaboration between GSA, FHWA, and NPS to develop an agreement for use or transfer of land for the access road, as well as GSA's commitment to serve as lead agency for Section 106 review related to such an undertaking.

Staff considers the construction of the west access road to be a critical component of the Plan, with 70% of employee vehicles arriving via Gate 4 along that road; therefore, staff recommends that approval of the Final Master Plan be contingent upon GSA's ability to construct the west access road connecting Firth Sterling Avenue, SE to the modified Malcolm X Avenue, SE / I-295 Interchange, through the Shepherd Parkway.

Staff also recommends that the Commission require GSA to submit to NCPC for review and approval, an Amendment to the Final Master Plan for the Interchange/Access Road Improvements that includes the following:

- An environmental document that complies with the National Environmental Policy Act (NEPA), including a Record of Decision by the Federal Highway Association with regard to the Malcolm X Avenue, SE / I-295 Interchange, and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency.
- Any modifications to the *Transportation Management Plan* resulting from ongoing analysis of the Interchange/Access Road Improvements.
- Any revisions to the concept design of the modified Interchange or Access Road as a result of NEPA or Section 106 consultation.

Phased Implementation

Phased implementation of a master plan is typical for large federal facilities, and is a pragmatic approach for the DHS Headquarters Consolidation at St. Elizabeths. Staff recognizes that the proposed phasing plan is responsive to related legislation, operational needs of DHS, as well as current/ planned funding. To date, DHS and GSA have requested funding for infrastructure improvements (ongoing), professional design services, and construction of the United States Coast Guard Headquarters and general security facilities, such as perimeter fencing and screening areas.

While staff supports the proposed phasing plan approach, we concur with several Consulting Parties and other affected agencies that Phase II of the plan is critical to the long-term rehabilitation of St. Elizabeths since it includes significant rehabilitation of buildings and landscapes on the West Campus as well as development of the East Campus portion of the project; GSA has acknowledged that Phase II work is essential to mitigate adverse effects to the National Historic Landmark. Therefore, staff recommends that, prior to commencement of construction to implement Phase I of the Final Master Plan, GSA be required to verify that it has submitted a Phase II prospectus authorization and funding request to Congress, consistent with federal requirements, in accordance with Stipulation I.B.1.c of the Programmatic Agreement that concluded Section 106 consultation on December 16, 2008.

Ongoing Section 106 Consultation

The Final Master Plan and the Final EIS for the project both state that follow-on Section 106 consultation is required for phases of work, individual projects, and actions related to use and potential acquisition of the Shepherd Parkway by either GSA or FHWA. Staff concurs with GSA's determination regarding additional consultation, and NCPC will continue to participate as a Consulting Party for ongoing Section 106 reviews.

In addition to staff's recommendation regarding the west access road (see above), we also recommend that GSA, prior to implementation of Phase I construction, be required to document that the areas of the Shepherd Parkway required to construct the west access road are available for use; and that GSA and FHWA, in collaboration with NPS, initiate Section 106 consultation for roadway construction in accordance with Stipulation III.A.2 of the Programmatic Agreement.

Ongoing Section 106 consultation for the East Campus is also required, as acknowledged in the Programmatic Agreement and the Final Master Plan documents. Staff recommends that, prior to commencement of construction to implement Phase I of the Final Master Plan, GSA should be required to establish a schedule for ongoing Section 106 consultation with Consulting Parties, addressing the East Campus and any Phase I projects currently funded.

Public Access

The unique character and location of St. Elizabeths has been recognized by its listing as a National Historic Landmark, and public access to the campus is important to share this significant resource and its national importance with the public. While staff acknowledges the need to maintain a Level 5 secure federal facility, we support the Final Master Plan commitments and related Programmatic Agreement stipulations that will provide regular public access to the Point, the Cemetery, and Hitchcock Hall at a minimum.

Staff recommends that, prior to commencement of any major construction and in collaboration with signatories of the Programmatic Agreement, GSA should be required to identify and implement, in collaboration with signatories of the Programmatic Agreement, opportunities and means for the public to have regular access to the Point, the Cemetery, and Hitchcock Hall. Staff also notes that planned access to the Cemetery should take into consideration any potential design changes to the perimeter fence around that site (see *Design Issues* below).

Design Issues: West Campus Perimeter and Gate 1 Entrance

The Final Master Plan framework is responsive to the Prior Commission Action as well as input from Consulting Parties; however, a consensus has still not been reached regarding two important design features: the West Campus perimeter fence around the Cemetery and the designs that may be required to accommodate the planned use of the Gate 1 entrance. Since both areas of the campus are visible from outside the site, and also have a public presence, staff supports ongoing (re)evaluations for both areas. Additionally, the design of the north edge of the West Campus perimeter fence, visible to Barry Farm residents, should also take into consideration concerns expressed by the District Department of Housing and Community Development (see Coordination section).

Staff supports the comments and requests by several Consulting Parties and affected District Agencies to develop alternatives that further minimize adverse effects at the Gate 1 entrance; and recommends that GSA be required to collaborate with Consulting Parties and District of Columbia agencies to explore traffic, access and design alternatives for the setting at Gate #1, including follow-on Section 106 consultation in accordance with Stipulation III.C of the Programmatic Agreement; and continue to explore alternatives that designate Gate #2 as the primary entrance to the West Campus. Staff also recommends that GSA conducts additional Section 106 consultation to evaluate the feasibility of placing the Cemetery inside the secure perimeter of the West Campus, in accordance with Stipulation III.C of the Programmatic Agreement and in response to access concerns expressed by Consulting Parties.



Figure 18: GATE #1 ENTRANCE

Although specific designs are not included in the Final Master Plan submission, visual simulations of several areas have been prepared by the applicant. Interior to the Gate 1 entrance is the inclusion large paved areas and multiple rows of bollards, which may to be retractable (Figure 18). Staff encourages GSA and DHS to explore more aesthetically appropriate security elements or bollards that can remain retracted for the majority of the time, in order to minimize visual impacts within the site.

East Campus Master Plan

In response to comments from NCPC, Section 106 Consulting Parties, DOI (in their 213 report), and the District of Columbia, GSA and DHS developed the Master Plan alternative that includes leasing a portion of the East Campus to both mitigate adverse impacts to the West Campus and to provide benefits to the District. NCPC staff strongly supports this aspect of the Final Master Plan, and acknowledges the unique public-private cooperation that is needed to support this effort; staff also finds that the inclusion of part of the program on the East Campus is in conformance with the Comprehensive Plan.

Although the Final Master Plan and supporting studies evaluate the East Campus portion of the Plan at a programmatic level, further detailed analysis is required. Therefore, staff recommends that GSA be required to submit to NCPC for review and approval, an Amendment to the Final Master Plan for the East Campus portion of the DHS Headquarters Consolidation that includes the following:

- An environmental document that complies with the National Environmental Policy Act and the National Historic Preservation Act, and that includes NCPC as a Cooperating Agency. Evaluations shall include an assessment of the cumulative effects of the proposed plan in addition to other reasonably foreseeable development for the site and adjacent neighborhood.
- Any modifications to the *Transportation Management Plan* related to ongoing analysis of the East Campus portion of the Plan.
- A *View Shed Analysis* of the impacts of East Campus development, including road widening, on views to the East Campus from Martin Luther King Jr. Avenue, SE and from the Suitland Parkway.
- A *Summary of Planned Amenities*, describing shared use facilities that would be included in the East Campus portion of the proposed federal development that would also be available to the general public.
- A *Construction Staging Plan* that describes the timing, location, and impacts of construction staging areas on the East Campus.

In summary, staff finds that the collaborative efforts of the General Services Administration, the Department of Homeland Security, and the District of Columbia to meet the housing needs of the federal government should be commended; and notes that the project has potential to provide financial benefits to the District as a result of federal leasing of approximately one million gsf of development on the East Campus, and to serve as a catalyst for development in Ward 8.

CONFORMANCE

Comprehensive Plan for the National Capital: Federal Elements

The Comprehensive Plan for the National Capital (Comprehensive Plan) provides goals and policies that guide the Commission in evaluating and acting on plans and projects in the National Capital. By retaining a significant sector of the federal workforce within the District of Columbia, stimulating neighborhood revitalization and growth, coordinating work with other federal and district agencies, and revitalizing a nationally significant historic resource and existing government land, the Final Master Plan for the DHS headquarters consolidation at St. Elizabeths to supports the three main themes of the Comprehensive Plan:

1. Accommodate federal and national capital activities
2. Reinforce smarter, more coordinated growth
3. Support coordination with local and regional governments

While staff finds that the Final Master Plan meets the broad goals of the Comprehensive Plan, we also acknowledge that some policies and goals associated with the individual elements of the Comprehensive Plan are not fully met by the project. Staff has evaluated the Final Master Plan for conformance with five of the seven Federal Elements of the Comprehensive Plan: the Federal Workplace, Transportation, Parks and Open Space, Federal Environment, and Preservation and Historic Features elements. In summary, staff finds the Final Master Plan to be in conformance with most of the goals and policies associated with each Element, and has identified and evaluated those aspects of the Final Master Plan that do not conform. The important factor, as in any project, is balance. A more detailed description of each Element follows.

Federal Workforce Element

The Federal Workplace Element encourages the federal workforce to be located within the District of Columbia to enhance the efficiency, productivity, and public image of the federal government; to strengthen the economic well-being and expand employment opportunities of the region and the localities therein; and to encourage federal agencies and communities to work together to improve operational efficiency and productivity of federally owned and leased workplaces and the economic health and livability of communities within the region. Through the successful coordination of federal, District, and local entities, the proposed DHS Headquarters consolidation conforms to the Federal Workforce Element policies for *Locating Federal Workplaces* and *Development of Workplaces with Communities*. Implementation of the Final Master Plan is expected to retain a large federal workforce at an existing federally-owned site in the District of Columbia; and to advance significant local planning objectives such as DCOP's East Campus Revitalization Framework Plan and the District's "Great Streets" initiative.

Transportation Element

The Transportation Element promotes a balanced, multi-pronged strategy to maximize federal employees' and facilities' access to the region's extensive transit system. The policies of this element address parking at federal facilities, impacts to the local and regional traffic/transit networks, and transportation management. The Final Master Plan submission conforms to the *Parking*, *TMP*, and *TDM* policies of the Comprehensive Plan by including a fully developed Transportation Management Plan, including commitments for extensive use of public transportation (35% Metro to 42% commuter bus – Metro combination), limitations on employee parking to the Comprehensive Plan ratio of 1:4 (except for a 1:3 ratio limited to 24-hour shift workers), and provisions for other incentives to reduce the use of single occupancy vehicles. Additionally, large areas of parking are located below grade and priority is given to carpool/vanpool parking – both in conformance with the *Parking* policies of this Element.

Parks and Open Space Element

The Parks and Open Space Element establishes policies to protect, enhance, and expand the region's parks and open space system, and to protect the forested ridgelines of the topographic bowl that surrounds the District. By reducing the above-ground development and limiting building heights, the Final Master Plan strives to reduce the impacts to important green spaces and the visual qualities they provides. The Design Guidelines included with the Final Master Plan have been written to improve conformance with this element. Concept designs for the USCG headquarters building, shared in early consultation with NCPC and Commission of Fine

Arts staffs, exhibit GSA's commitment to preserve open space and the green topographic bowl as much as possible by reducing the monolithic appearance of the building and by integrating the structure into the wooded hillside to a greater degree than that depicted in the Final Master Plan; by keeping the roofs below the ridgeline; and by placing 333,700 gsf, nearly one-third of the total building program, below the virtual grade.

While the plan meets the goals and policies of the Transportation Element, the proposed parking structures would have a negative impact on the open space of the site and would visually impact the topographic bowl. Staff acknowledges that these Final Master Plan elements do not fully conform to the Parks and Open Space Element of the Comprehensive Plan, and will consider, with GSA, ways to better meet the policies and/or minimize the effects of parking structures during individual design reviews that are required following the Final Master Plan approval.

The Final Master Plan does not provide for construction of the section of the Fort Circle Parks Trail within the project area, as called for in the Comprehensive Plan and as identified as potential mitigation by the Commission in their comments on GSA's Draft Master Plan. Construction of the trail was considered as possible mitigation during Section 106 consultation, and not included in GSA's Programmatic Agreement; however, NCPC staff would continue to support such an action (subject to coordination with the NPS) should this measure be initiated by GSA/NPS in the future.

Federal Environment Element

The Federal Environment Element promotes the federal government as an environmental steward and identifies the Commission's planning policies related to the maintenance, protection, and enhancement of the region's natural environment. The Final Master Plan identifies preliminary measures for stormwater management techniques to reduce or eliminate runoff into the local rivers; and building plans would incorporate green roofs, local materials, and other sustainable materials and methods to achieve at least a LEED Silver certification.

Preservation and Historic Features Element

The Preservation and Historic Features Element helps to strengthen the significant architectural and planning character that makes the national capital a unique place, including protection of the topographic bowl (see Parks and Open Space Element above). There are several measures identified in the Programmatic Agreement, which concluded Section 106 consultation for the master planning phase of the project, that are consistent with the objectives of the Preservation and Historic Features Element of the Comprehensive Plan as well as with Section 110 (f) of the National Historic Preservation Act (see *National Historic Preservation Act* section, page 40).

Additionally, the Final Master Plan includes extensive rehabilitation and preservation of nearly all of the contributing buildings and a large number of contributing landscape features extant on the site. Nevertheless, GSA has determined that the undertaking would cause adverse effects to the National Historic Landmark. Staff has concurred with this determination throughout the Section 106 consultation process. The executed Programmatic Agreement is intended to address these adverse effects as carefully and comprehensively as possible, and recognizes the need to balance the project's operational requirements with appropriate treatments of the NHL; but the proposed alterations to the setting of the National Historic Landmark mean that the policies of this Element would not be fully met.

National Environmental Policy Act (NEPA)

Pursuant to the requirements of NEPA, GSA, in cooperation with DHS, NCPC, FHWA, and the District Department of Transportation, prepared an Environmental Impact Statement (EIS) for the St. Elizabeths Final Master Plan. NEPA is a procedural statute, and provides for development of information but does not require a particular outcome. The Final EIS (FEIS) was issued by GSA on November 7, 2008 and, following receipt of public comments that were due on December 8, 2008, GSA issued its Record of Decision on December 16, 2008.

The EIS considered the impacts of the Plan and its associated projects on the 176-acre federal campus, considered alternatives to the Plan and associated projects on the 176-acre federal campus and impacts of those alternatives. It also evaluated the impacts on the East Campus (District-owned) portion of the site at a programmatic level. GSA made the draft EIS available to the public for a 90-day public comment period and circulated the FEIS for a 30-day review period starting November 7, 2008. GSA completed a review of comments and concluded its NEPA work on December 16, 2008 with a Record of Decision (ROD).

NCPC is a federal agency with its own NEPA obligations set forth in its Environmental and Historic Preservation Policies and Procedures. NCPC has participated as a Cooperating Agency in GSA's development of its EIS, and NCPC provided comments on the draft and final documents. The FEIS has also been made available to the Commission members. NCPC's Executive Director has adopted GSA's FEIS under NCPC and Council on Environmental Policy procedures, and in conjunction with this report, has satisfied NCPC's independent NEPA obligations.

NCPC is, in this EDR, using the GSA Final EIS to inform its review and recommendations on the Final Master Plan. The following is a summary of the environmental considerations, as required by NEPA Regulations, 40 CFR 1505.2, and NCPC's conclusions regarding the planning for the Final Master Plan and addressing proposed future improvements on federally-owned or federally-leased property.

Alternatives Considered

The FEIS evaluates three Build alternatives (Alternatives 3, 4, and 5) and a No Action alternative in detail; and also includes alternatives considered but eliminated from detailed study (including a 2.5 million gsf alternative prepared in response to NCPC and Consulting Party reviews of draft NEPA and master planning documents). The three Build alternatives were developed to meet the stated purpose and need of the project, and the No Action alternative is required under NEPA. The three Build alternatives have several common elements.

No Action Alternative

Under the No Action Alternative, the GSA property would remain under federal ownership and the DHS headquarters consolidation would not occur at the site. The West Campus would remain a secure location with vacant buildings, the existing maintenance plan would continue to be implemented, and the property would not generate revenue for GSA. No new impacts would occur, but the impacts on contributing historic buildings would be major, long-term, and adverse due to continued deterioration to the buildings and increased risk of vandalism and theft.

Build Alternatives 3, 4, and 5

Three Build alternatives were considered to meet the purpose and need; all re-use existing resources at St. Elizabeths and propose new construction to meet the need for a total of 4.5 million gsf) of office and shared use space, plus parking.

Alternative 3 consists of redeveloping the St. Elizabeths West Campus with 4.5 million gsf of office and shared use space, plus parking at a ratio of one space for every three employees. Alternative 4 consists of redeveloping the St. Elizabeths West Campus with 4.5 million gsf of office and shared use space, plus parking at a ratio of one space for every four employees with the exception of 24/7 shift employees for whom parking would be provided at a ratio of one space for every three employees. Under Build Alternative 5, 3.8 million gsf of office and shared use space would be on the West Campus and an additional 750,000 gsf of office space would be constructed on the East Campus to provide the total 4.5 million gsf needed for the DHS Headquarters. Parking ratios under Build Alternative 5 would be the same as Alternative 4, and parking on each side of the site would be commensurate with the related number of employees located on each.

Transportation Improvement Alternatives

In addition to the four described campus development alternatives, the FEIS considers five alternatives related to road access to the West Campus and two alternatives to modify Martin Luther King, Jr. (MLK) Avenue to the east. All three Build alternatives require construction of a new west access road, and the FEIS considers four alternatives (Interchange/Access Road Alternatives I-1 through I-4) to modify the Malcolm X Avenue / I-295 Interchange, which would also serve to accommodate the new west access road through the Shepherd Parkway to the St. Elizabeths West Campus. The FHWA has determined that the proposed undertaking is also subject to section 4(f) of the Department of Transportation Act of 1966, and additional evaluation and NEPA compliance is ongoing. Decisions based on FHWA's 4(f) evaluation will be deferred until that analysis is finalized; and it is anticipated that the FHWA will issue a ROD with regard to these improvements in March 2009.

The fifth Interchange/Access Road alternative (Alternative I-0) was developed to include only the access road, terminating just south of the Cemetery, as an analysis requirement. Under Alternatives I-1 through I-4, the access road would be located on the west edge of the West Campus, adjacent to I-295, would connect Firth Sterling Avenue to the modified highway interchange, and would be located through the Shepherd Parkway (NPS property) south of the GSA property. GSA or FHWA must secure a road right-of-way from the NPS for construction of the access road through the parkway land.

Two alternatives to modify MLK Avenue (MLK-1 and MLK-2) evaluate the impacts of widening MLK Avenue to the east and introducing designated turn lanes into the St. Elizabeths East and West Campuses. Both alternatives are compatible with any of the Interchange/Access Road alternatives, and also support the District's "Great Streets" initiative planned for MLK Jr. Avenue.

Environmentally Preferred Alternatives

The alternative that best meets the objectives of NEPA is known as the Environmentally Preferred Alternative. This option, according to the Council on Environmental Quality regulations, is the alternative that causes the least damage to the biological and physical environment. It also is the alternative which best protects, preserves, and enhances historic, cultural, and natural resources. Identification of the Environmentally Preferred Alternative within an EIS process is a requirement of NEPA regulations regardless of the intent of the

project. Based on the information presented in the FEIS, NCPC staff has determined that the Environmentally Preferred Alternative is Build Alternative 5; and that information included in the FEIS indicates that Alternatives I-2 and MLK-2 are also preferred, but are subject to review and approval by DDOT and/or FHWA and may require modifications as a result of ongoing NEPA evaluations.

Build Alternative 5 proposes a reduced amount of new construction to the West Campus providing an opportunity to introduce development that would have mitigating effects for the West Campus while providing benefits to the immediate community through federal lease of private facilities on the East Campus.

NCPC staff has determined that Build Alternative 5 does introduce significant visual and historic resource impacts that would adversely impact the NHL. However, GSA and DHS have specified in the Final Master Plan submitted to NCPC for review, mitigation actions that would minimize adverse effects and achieve replacement of resources while meeting several goals of the Comprehensive Plan. GSA and DHS have also committed to this mitigation in the FEIS (see Summary table below).

The FEIS evaluates impacts for each of the alternatives, and development of the Final Master Plan is based on Build Alternative 5. The areas evaluated included the following: Air Quality, Hazardous Materials, Terrestrial Biological Effects, Historic Preservation Effects, Stormwater Drainage, Noise, Transportation, Transit and Effects. Of the identified impacts, those to historic preservation, transit and transportation, and vegetation were determined to be the most adverse.

In accordance with 40 CFR 1502.14(e), which requires that a preferred alternative be identified in this Final Environmental Impact Statement, the interchange preferred alternative is Alternative I-2 and the MLK Avenue widening preferred alternative is MLK Alternative 2. GSA's identification of these alternatives as preferred is based on coordination with, and is subject to, subsequent final determinations of the Federal Highway Administration and the DC Department of Transportation, agencies that are anticipated to base their approvals in part upon this Final Environmental Impact Statement.

Implementation

Implementation of the preferred alternatives is dependent on certain FHWA and District of Columbia actions and approvals, including the implementation of the Small Area Framework Plan for the East Campus recently approved by the DC City Council. GSA and District of Columbia coordination is ongoing, and it is anticipated that such actions and approvals will be obtained.

Mitigation Committed to by GSA in its submission to NCPC

The impacts of the proposed development have been fully analyzed in GSA's FEIS, and NCPC here refers to the "Summary of Impacts" included in the adopted GSA ROD, Appendix G. GSA, in its Record of Decision, has committed to minimize and/or mitigate environmental impacts through the following measures (also refer to the "Mitigation Measures" related to historic/cultural resources in the *National Historic Preservation Act* section, beginning on page 40):

Impacted Areas	Minimization / Mitigation Commitments
Historic Buildings	<ul style="list-style-type: none"> ▪ Documentation of contributing buildings to be demolished in accordance with the Historic American Building Survey (HABS) and Historic American Engineering Record (HAER). ▪ Incorporation of engineering methods to protect the buildings and through construction monitoring to ensure that the buildings remain stable. ▪ Mitigation measures outlined in the Programmatic Agreement
Cultural Landscapes and Archaeological Resources	<ul style="list-style-type: none"> ▪ Locating temporary construction fences and construction staging to avoid or minimize impacts to historic landscapes. ▪ Preparation of a Landscape Protection Plan for use during construction activities. ▪ Documentation of lost resources to Historic American Landscape Survey standards. ▪ Using green roofs to partially minimize impacts to views of the site. ▪ Mitigation measures outlines in the Programmatic Agreement
Soils	<ul style="list-style-type: none"> ▪ Placement of drainage devices adjacent to graded slopes to intercept water flows. ▪ Erosion and sediment control measures such as silt fencing, erosion control matting, earth or hay berms. ▪ Application of seed to all areas where soil is exposed. ▪ Replacement of tall, dense, vegetation in proximity to the security perimeter fence with shorter vegetation.
Surface Water	<ul style="list-style-type: none"> ▪ Erosion and sediment control measures such as silt fencing and/or super silt fencing, inlet protection devices, sediment basins, and/or sediment traps; introducing permanent or temporary seeding on areas with exposed soil. ▪ Use of on-site stormwater management retention devices to reduce the volume of runoff from entering existing streams. ▪ Use of integrated pest management and turf maintenance practices for landscaping.
Groundwater	<ul style="list-style-type: none"> ▪ Use of integrated pest management and turf maintenance practices for landscaping. ▪ Use of on-site stormwater management infiltration devices to capture stormwater runoff and divert it to the subsurface. ▪ Minimize the amount of impervious surfaces, specifically around the western and southern site perimeters of the campus.
Wetlands	Mitigation requirements for impacts to wetlands will be decided in conjunction with the US Army Corps of Engineers.
Vegetation and Wildlife	<ul style="list-style-type: none"> ▪ Implementation of a forest management plan. ▪ Landscaping newly developed areas with native vegetation. ▪ Removal of the existing deer population from the campus and fencing deer out of the completed campus. ▪ Limiting clearing for construction to only those areas needed to construct structural components (buildings, parking lots, etc.). ▪ Limiting soil compaction to no more than 25 percent of the roots within the dripline, or the outer-most edge of a tree's canopy. ▪ Protecting intermediate size species to the dripline. ▪ Protecting extra space beyond the dripline for sensitive or specimen species.

Impacted Areas	Minimization / Mitigation Commitments
Aquatic Biota	<ul style="list-style-type: none"> ▪ Erosion and sediment control measures such as silt fencing and/or super silt fencing, inlet protection devices, sediment basins, and/or sediment traps; introducing permanent or temporary seeding on exposed soil areas. ▪ Use of on-site stormwater management retention devices to reduce the volume of runoff from entering existing streams. ▪ Use of integrated pest management and turf maintenance practices for landscaping.
Protected Species	<ul style="list-style-type: none"> ▪ Limiting clearing and fence construction in the vicinity of the threatened species during the breeding season. ▪ Limiting construction within the vicinity of the threatened species, as agreed to with the USFWS. ▪ Use of visual barriers to help mask buildings and human activity.
Economy and Employment	<ul style="list-style-type: none"> ▪ Opportunities for employment related to the construction of the St. Elizabeths West Campus would be identified through the DC Department of Employment's First Source Program. ▪ Community meetings to educate citizens and businesses on employment and contracting opportunities. ▪ Requirement of apprenticeship programs by construction contractors.
Noise	<p>Short term construction impacts to noise levels will be mitigated through the following:</p> <ul style="list-style-type: none"> ▪ Equipping construction equipment powered by an internal combustion engine with a properly maintained muffler. ▪ Use of air compressors that meet current EPA noise emission standards. ▪ Minimizing nighttime construction activities. ▪ Use of portable noise barriers within the equipment area and around stationary noise sources. ▪ Tools and equipment should be selected to minimize noise.
Air Quality	<p>Short-term construction impacts to air quality will be mitigated through the following:</p> <ul style="list-style-type: none"> ▪ Maintenance of emission controls on all construction equipment. ▪ Covering/wetting exposed soils to reduce fugitive dust. <p>Long-term impacts to air quality from site operations will be minimized through the following:</p> <ul style="list-style-type: none"> ▪ Limits on permitted hours of operation per year ▪ Incorporation of NOx control technology for boilers such as low NOx burners, selective catalytic reduction (SCR), or selective non-catalytic reduction (SNCR) control technologies. ▪ Utilize on-site co-generation technology to produce power for site operation and steam for heating and cooling.
Transportation	<ul style="list-style-type: none"> ▪ Implementation of a Transportation Management Plan (TMP) to reduce single-occupancy vehicle trips to the campus.
Energy Consumption	<p>Impacts from energy distribution will be mitigated through the following:</p> <ul style="list-style-type: none"> ▪ Locating utility routes under or adjacent to existing and planned roads and sidewalks. For existing structures, obtain LEED (EB) certification. <p>Energy consumption will be minimized through the following:</p> <ul style="list-style-type: none"> ▪ Obtaining a Silver rating under the Leadership in Energy and Environmental Design for New Construction (LEED-NC). ▪ Inclusion of energy efficient building design, to the extent feasible, including building orientation, energy efficient glazing, and energy efficient systems such as lighting and HVAC.

Impacted Areas	Minimization / Mitigation Commitments
Water and Sewer	<p>Impacts from water and sewer lines will be mitigated through the following:</p> <ul style="list-style-type: none"> ▪ Locating utility routes under or adjacent to existing and planned roads and sidewalks <p>Water consumption and sewer discharge will be minimized through the following:</p> <ul style="list-style-type: none"> ▪ Obtaining a Silver rating under the Leadership in Energy and Environmental Design for New Construction (LEED-NC). ▪ Use of native and drought tolerant plant in landscaping. ▪ Reuse of gray water for irrigation and water saving faucets and toilets to reduce water consumption. ▪ Use of high-efficiency fixtures, occupant sensors to reduce potable water demand, composting toilets, waterless urinals, re-use of stormwater and graywater for non-potable applications such as toilet and urinal flushing, mechanical systems and custodial uses.
Stormwater Management	<p>Stormwater runoff from the Campus will be minimized through the following:</p> <ul style="list-style-type: none"> ▪ Limiting the amount of impervious surfaces to the extent possible ▪ Use of pervious surfacing materials for roadways and sidewalks <p>Mitigation measures to provide stormwater quantity and quality control will include the following:</p> <ul style="list-style-type: none"> ▪ Use of low-impact development best management practices (LID BMPs). ▪ Containment of stormwater near areas of contaminated fill to prevent release into the environment. ▪ Collection of a portion of the roof runoff and reuse of it as gray water for irrigation of green roofs, irrigation of surface landscaping, and non-potable uses within the building. ▪ Use of grass channels adjacent to roadways to function as the water quality BMPs, and use of water quality BMPs in conjunction with stormdrains along roadways where grass swales cannot be constructed.
Communications	<ul style="list-style-type: none"> ▪ Use of fiber optic technology wherever possible to minimize the size and number of cables that would need to be constructed. ▪ Implementation of erosion and sediment controls during construction. ▪ Locating utility routes under or adjacent to existing and planned roads and sidewalks.
Solid Waste	<ul style="list-style-type: none"> ▪ Implementation of a recycling program during the construction of the project. ▪ Implementation of waste prevention and recycling activities during site operating in accordance with Executive Order 12873, Federal Acquisition, Recycling, and Waste Prevention; Executive Order, 13101, Greening the Government through Waste Prevention, Recycling, and Federal Acquisition; and Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management.
Environmental Contamination	<ul style="list-style-type: none"> ▪ Characterization and remediation of areas with recognized environmental conditions prior to disrupting contaminated soils or groundwater. ▪ Disposal of drums, canisters or other abandoned hazardous materials. ▪ Removal of dumped material for disposal. ▪ Abatement of ACMs, LBP, PCBs, and mercury prior to the commencement of demolition or renovation activities. ▪ Dust suppression measures would be employed during construction activities. Engineering controls resulting in a physical barrier between the ash/fill and on-site grounds workers and/or personal protective equipment, will likely be required for such workers working in landscaped areas located in the ash/fill disposal area.

Environmental Protection Agency (EPA) Comments

Comments submitted by the EPA to GSA note the significant impacts that the proposed development would have on the St. Elizabeths West Campus, and identify concerns specific to the density of new construction on the West Campus and the needed detailed analysis for the proposed East Campus development. The EPA also requested that future NEPA analysis required to complete compliance for the East Campus portion of the project be provided to EPA for review and comment.

Monitoring or Enforcement Program

NCPC will monitor GSA's implementation of its impact mitigation commitments identified in its submission and in this report through its review under the National Capital Planning Act. All GSA-implemented construction, building and site improvements as specified by the NCPC's federal project submission requirements will be subject to review and approval by NCPC. GSA must also adhere to the Section 106 Programmatic Agreement, and must meet the Stipulations of that Agreement.

NCPC staff recognizes and notes that GSA has committed to obtain all necessary permits for noise compliance for the project construction work as provided by District of Columbia noise regulations. Additionally, staff notes that GSA must meet all transportation management requirements for specific phases of the project as set forth in the TMP submitted with the Final Master Plan, including annual monitoring and update of the TMP by DHS' Employee Transportation Coordinator.

Unresolved Issues

No major unresolved issues exist in relation to NEPA review for the West Campus Build Alternatives. The affected environment and environmental impacts associated with development on the East Campus portion of the federal program are described at a programmatic level, except for effects to MLK Avenue transportation that are fully analyzed based on the projected traffic data that have been developed. GSA will complete additional, detailed NEPA analysis on the proposed development on the East Campus now that the District of Columbia government has approved moving forward with a modified Small Area Redevelopment Framework Plan for the East Campus; conclusion of NEPA for the East Campus is expected in early 2010. The FHWA will complete its evaluation of the impacts related to the Interstate modification and West Access Road Construction in March 2009.

NCPC NEPA Conclusion

The FEIS considers GSA's preferred alternatives to determine if they satisfy the identified purpose and need for the proposal and minimize/mitigate the impacts that would result. GSA has included in its Final Master Plan submission all practicable means to avoid or minimize environmental harm from the proposal, as analyzed in the FEIS as the Preferred Alternatives. NCPC's Executive Director has evaluated and adopted the Final EIS.

National Historic Preservation Act (NHPA)

The Secretary of the Interior designated St. Elizabeths a National Historic Landmark (NHL) in 1990 for its significance and exceptional value in illustrating the history of the United States. St. Elizabeths represents important nineteenth and twentieth century social and humanitarian movements associated with the advances in mental health care. St. Elizabeths is also significant for its association with figures of national importance, and for its architecture. The NHL includes 82 contributing buildings, 62 of which are on the West Campus. Fifty-one of the 62 contributing buildings would be rehabilitated in accordance with the Final Master Plan. Historic landscape features are integral to the use and significance of the site and to the NHL designation. Important viewsheds within the campus, as well as into and out from the campus, are also integral to the significance of the property.

Section 106 and Section 110 of the National Historic Preservation Act

GSA serves as lead agency for Section 106 review of the redevelopment of St. Elizabeths. GSA is required to address the determined adverse effects by seeking ways to avoid, minimize, or mitigate them. A Programmatic Agreement (PA) for the Final Master Plan was executed on December 9, 2008. The PA stipulates mitigation measures and addresses the processes and goals for future consultation on individual projects or project phases. Each of the future projects or phases would be the subject of more specific consultation that is anticipated to be addressed in a Memorandum of Agreement between GSA, DHS, NCPC and other parties.

Because the campus is an NHL, Section 110(f) of the NHPA is invoked and requires that “the federal agency official, to the maximum extent possible, undertake such planning and action as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” Since it has approval authority for the proposed undertaking under the Planning Act, the National Capital Planning Commission shares this requirement and responsibility with GSA.

NCPC’s principal objective throughout the definition and development of this Undertaking, and throughout the Section 106 consultation since it commenced in 2005 has been to minimize harm to the National Historic Landmark to the maximum extent possible, as the Commission is obligated to do under Section 110 (f) of the National Historic Preservation Act.

Shifting some development of the Undertaking off the West Campus in order to preserve more historic landscape and improve the setting of some of the historic buildings has been a primary means of minimizing harm in the final year of Final Master Plan development since the Commission reviewed and commented on the Draft Master Plan in November 2007. GSA’s improved proposal in the Final Master Plan for the retention and rehabilitation of most of the contributing buildings and for preservation of many of the contributing landscape features would minimize harm to individual resources on the campus. However, the Undertaking’s adverse effects on the character of the historic campus, as a whole, resulting from the size of the program, has presented a difficult challenge for minimizing harm to the NHL. Some of the acknowledged adverse effects can only be mitigated (as opposed to minimized) by additional measures contained in GSA’s Programmatic Agreement.

Programmatic Agreement

GSA began Section 106 consultation meetings with a large number of interested organizations, individuals, and agencies in 2005. The Programmatic Agreement (PA) is the outcome of consultation among GSA, federal and District of Columbia agencies and a wide range of consulting parties. The PA's required signatories are GSA, the Advisory Council on Historic Preservation (ACHP), and the DC State Historic Preservation Office (DCSHPO). Invited signatories who signed the PA are NCPC, FHWA, and DHS. The NPS was also invited to sign, but declined. The ACHP's acceptance of GSA's PA, as witnessed by its signature and letter of December 15, 2009, concluded S106 for the Final Master Plan.

The *Undertaking* in the PA is defined as the redevelopment of the West Campus and the North Campus Parcel of the East Campus, widening of MLK into the East Campus together with new roadway and interchange construction within portions of NPS property known as The Shepherd Parkway, for use as a high-security federal campus for the DHS Headquarters. The Undertaking is to be carried forth in accordance with the Final Master Plan. The *Site* is the redevelopment area defined as the West Campus and the North Campus Parcel of the East Campus.

Shepherd Parkway

The Shepherd Parkway is parkland under the jurisdiction of the NPS that GSA states is necessary for access to the campus, however, is not stipulated in the PA because GSA has not obtained agreement from NPS on the use of portions of the Parkway for access to the Site. Several *Whereas* clauses in the PA refer to The Shepherd Parkway, including one that states that "implementation of the Master Plan is dependent upon the completion of the new roadway and interchange construction [within] Shepherd Parkway, including major expansion of the Interchange between I-295 and Malcolm X Avenue, SE." Additional evaluation of this portion of the project is being conducted by FHWA through their 4(f) evaluation, and will require subsequent Section 106 review, in coordination with the NPS, before any final plan for the parkway is approved.

East Campus

The PA acknowledges that additional compliance measures will be necessary for the East Campus. A 1994 Memorandum of Agreement currently governs review of alterations to historic resources on the East Campus, which is also part of the St. Elizabeths National Historic Landmark. Since the East Campus was added to the Undertaking more recently than the West Campus, a commensurate level of study and analysis has not occurred. New construction and alterations to the East Campus are not anticipated before Phase II of the Final Master Plan. Before then, GSA will develop further compliance guidelines or agreements as necessary, in consultation with the other signatories and consulting parties.

Preservation, Design, and Development Guidelines

The PA contains many exhibits that will be used in concert with the stipulations in the PA. Perhaps the most significant PA exhibit for the implementation of future projects on the campus is also the primary mitigation for the adverse effects resulting from the redevelopment of the campus. That is the "Preservation, Design, and Development Guidelines" (Design Guidelines) which require that all rehabilitation work be carried out in compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties, and that design professionals also meet stringent qualification standards. GSA developed the Design Guidelines specifically for the significant historic properties on the St. Elizabeths West Campus. If applied as written, they are the primary mitigation for the adverse effects of the Undertaking on the National Historic Landmark. The Design Guidelines describe and define the appropriate rehabilitation of the

historic buildings and historic landscape, treatment of potential effects to archaeological resources, and preservation of contributing viewsheds. GSA will use the Design Guidelines in the development of its projects on the campus, although further consultation is anticipated to avoid, minimize or mitigate adverse effects of individual projects.

Ongoing Consultation

While the PA documents the mitigation agreed to by the signatories, it also establishes the consultation process for future individual development projects or phases. The agencies and other parties will be informed and invited to continue to participate in consultation. NCPC's normal review procedures will be followed for projects and, if necessary, proposed Master Plan modifications.

Staff has identified several areas of particular concern as design development proceeds. These are noted in the PA. They include the historic gatehouse and treatment of the setting at Gate #1. Given the proposed parking garage at this location and the expectation of security barriers and gates, the appearance of this area would be altered substantially from its current appearance. For the public, this may be the only cultural landscape at St. Elizabeths that would remain visible on a daily basis, without appointment. The opening in the historic wall along Martin Luther King, Jr. Avenue, SE affords a view of the historic gatehouse and into the northern portion of the campus. It is critical that these historic properties and the views from the avenue into the campus be treated as sensitively as possible. Another critical concern is the protection of the setting of the cemetery, from visual as well as audible intrusions. The maintenance or robust replacement of the western vegetative buffer (between the cemetery and I-295) and the sensitive design and relationship of the north façade of the proposed US Coast Guard headquarters building to the south of the cemetery are crucial to the preservation of the cemetery as a significant property on the campus. Timely consultation on these important cultural landscapes is critical.

Cultural Landscape Report

GSA has produced an excellent Cultural Landscape Report (CLR) that identifies and documents the significant extant contributing landscape features and treatment measures. Some of the features can be reconstructed and many can be preserved or rehabilitated appropriately. The CLR has been indispensable in the development of the Final Master Plan and analysis of and consultation on the adverse effects.

Mitigation Measures

In addition to adherence to the "Preservation, Design, and Development Guidelines," several mitigation measures are included in the PA, and are summarized as follows:

- Documentation and recordation of the site, to HABS/HAER/HALS standards.
- A public repository for documents related to this Undertaking, and a digital database.
- Historic Structures Reports, to be written as individual projects are developed.
- A Historic Landscape Preservation Treatment and Management Plan, to be developed.
- Archaeological Resources Treatment and Management Plan, to be developed.
- Public Outreach, Interpretation, and Education, including a permanent exhibit off-site, a St. Elizabeths Museum/Visitors Education Center (location to be determined), and a Citizens Advisory Panel that will be based on GSA's "Good Neighbor" program; education programs and lesson plans to be developed for DC public and charter schools; an oral history program, and other products.

- Public Access: GSA will work with DHS to develop a public access program, featuring the Point, Hitchcock Hall, and the cemetery, consistent with the requirements of a Level 5 ISC facility. Tours conducted by the DC Preservation League and GSA will continue prior to and in some way during construction of the campus. Consultation will occur for the development of the Public Access Plan once the campus is occupied. NCPC will participate.
- Cemetery: The cemetery will be accessible to the public, with some security measures or restrictions that will be developed through additional consultation as noted in the PA. GSA is responsible for the protection of the cemetery.

COORDINATION

Coordinating Committee

The Coordinating Committee, at its December 17, 2008 meeting, reviewed the Final Master Plan and forwarded the proposal to the Commission with the statement that the project has been coordinated with all participating agencies, except the District Department of Transportation. The participating agencies were NCPC; the District of Columbia Office of Planning (DCOP); the General Services Administration; the District Department of Housing and Community Development, the District of Columbia Fire Department, the Washington Metropolitan Area Transit Authority, the NPS, and the General Services Administration.

DDOT was not prepared to coordinate at the Committee meeting, pending further discussions with GSA and NCPC at a meeting held on December 18, 2008; DDOT coordinated the project based on the discussions at that follow-on meeting, and requested to be included in all future traffic or transportation evaluations. GSA reiterated their commitment to continue coordination with DDOT, noting that DDOT has the ultimate approval authority for transportation decisions that affect the local roadway network.

U.S. Commission of Fine Arts

The Final Master Plan was reviewed and approved by the Commission of Fine Arts (CFA) at their November 20, 2008 meeting. CFA acknowledged the positive changes to the plan since the prior submission, and acknowledged the challenges that have been part of the project due to the program's large scale and the NHL status of the site. While CFA approved the project, they stressed the importance of quality design for the new construction, particularly for the U.S. Coast Guard facility planned for the western slope of the site.

The Commission acknowledged the testimony of several speakers, including Consulting Parties to the Section 106 process, who expressed concerns that the density is still too great for the National Historic Landmark, and that the current funding does not include money for Phase II rehabilitation work.

Overall, the Commission commended the GSA and the project team for their efforts to preserve historic resources and recognized the importance of federal stewardship for the landmark site.

National Environmental Policy Act Coordination

GSA has been the lead agency for development of an Environmental Impact Statement (EIS) for the reuse of the St. Elizabeths campus and location of a headquarters for the Department of Homeland Security; GSA commenced preparation of the EIS in June 2005. NCPC has participated as a cooperating agency for the EIS. In carrying out its lead agency responsibilities, GSA has developed information, held numerous meetings with NCPC and other agencies, and has conducted a number of public hearings. The draft and final versions of the Environmental Impact Statement were made available for public comment.

Consultation with the District of Columbia

Staff has been consulting with both the District of Columbia Office of Planning (DCOP) and the District Department of Transportation (DDOT) about the effects of the development on the Ward 8 community as well as the local transportation network. It is anticipated that continued coordination between GSA, DCOP, and DDOT is essential in implementing GSA's Transportation Management Plan and providing optimal access to both the West and East Campus portions of the development. As a result of earlier consultation, the parking ratio was reduced from the 1:3 ratio included in the Draft Master Plan to the current levels (1:4 for 13,000 employees plus 1:3 for 1,000 shift workers) recommended for this part of the District of Columbia.

Referral to District of Columbia Agencies and Related Organizations

As part of NCPC's review, the Final Master Plan was referred to the following entities:

- District of Columbia Deputy Mayor for Economic Development (DMPED)
- District of Columbia Department of Transportation (DDOT)
- District of Columbia Office of Property Management (DC-OPM)
- District of Columbia Office of Planning (DCOP)
- District of Columbia State Historic Preservation Office (DC SHPO)
- District of Columbia Office of the Environment (DCOE)
- District of Columbia Department of Housing and Community Development (DHCD)
- District of Columbia Fire Department (DCFD)
- Washington Metropolitan Area Transit Authority (WMATA)
- National Park Service (NPS)

Comments received from these agencies to date are as follows:

DDOT Review Comments

The District of Columbia Department of Transportation is very supportive of the project, and provided comments specific to the transportation impacts and management strategies that would be required to accommodate the increased population and vehicles that would be introduced to the area. Comments focused primarily on the scope of transit alternatives considered and the long-term impacts to the local transportation network. DDOT has requested ongoing coordination with GSA, FHWA, and NCPC to monitor and refine transportation improvements to minimize impacts from the project.

GSA has acknowledged that DDOT has the final authority over modifications to the local transportation network, and will continue to coordinate all work with DDOT as well as FHWA.

DCOP Review Comments

The District of Columbia Office of Planning is very supportive of the project, and supports Build Alternative 5 that shifts a portion of the program to the East Campus. Additionally, DCOP acknowledges the potential benefits of the final plan to launch revitalization of the East Campus, to stimulate the Ward 8 economy, and to use the Great Streets initiative to provide an opportunity to improve local pedestrian and bicycle facilities. DCOP also encourages projects that can help Ward 8 small businesses benefit from the development.

DCOP's written comments express concerns with regard to proposed modifications to the entry gates along Martin Luther King Jr. Avenue, particularly to Gate 1, as well as transportation/parking concerns and perimeter security impacts at the Cemetery. DCOP has requested that GSA and DHS reconfigure the perimeter fence to include the Cemetery.

NCPC has coordinated the project with DCOP, and supports GSA's commitment to explore DCOP's recommendations through further Section 106 consultation and community involvement.

DHCD Review Comments

The District of Columbia Department of Housing and Community Development submitted written comments supporting the planning principles and design guidelines that have been developed for the project, and urged the development team to apply these standards diligently to individual projects. At the Coordinating Committee meeting conducted on December 17, 2008, the DHCD representative raised concerns specific to the appearance of the outside perimeter fence along the north edge of the site (facing Barry Farm), requesting that the be design and placed be aesthetically appropriate for the neighboring residential development.

NCPC staff will work with GSA and their design team to respond directly to these comments during design reviews for perimeter security elements submitted to the Commission for review and approval prior to implementation of Phase I of the Plan.

DCFD Review Comments

At the Coordinating Committee meeting conducted on December 17, 2008, the DCFD representative raised concerns that emergency response times needed to be evaluated for the site, and requested that evaluations consider the distance to nearby responders as well as challenges posed by the planned security measures for the site. GSA has consulted with the DCFD since the meeting, and confirmed that the St Elizabeths West Campus is in the response area for Fire Dept Battalion No. 3 which includes several fire stations. The first response fire station is Engine No. 25 located at 3203 MLK Ave. Other fire stations in the Battalion No. 3 area would respond as alternates for backup. Additional coordination with regard to infrastructure will be conducted by GSA.

NPS Review Comments

The NPS provided written comments acknowledging that Build Alternative 5 shows an attempt to minimize impacts to the National Historic Landmark campus, but expressed concerns about the proposed density of the development, the effects of underground development, impacts to the topographic bowl, and the lack of ready public access to several areas of the West Campus. The NPS also believes that the Plan does not conform to the “Parks & Open Space” and “Historic Preservation” federal elements of the Comprehensive Plan, expressing concerns that the proposal does not address some prior Commission comments, including construction of the Fort Circle Parks Trail and locating support facilities in the adjacent neighborhood. Additionally, the NPS does not concur with the FEIS findings with regard to the west access road, stating that they do not agree that the road through the NPS Shepherd Parkway is the most feasible and prudent alternative, from an engineering and traffic standpoint, to access the West Campus. In summary, the NPS believes that the impacts from the proposed plan will significantly and permanently diminish the historic integrity of the landmark and the natural and cultural resources of the Shepherd Parkway.

Based on staff analysis, the proposed master plan provides a balanced approach to development that conforms to the overarching goals and policies of the Comprehensive Plan, although not fully with all policies of the Federal Elements (as described in the Conformance section of this report). NCPC staff has considered NPS comments in our review and recommendations for the project, and encourages GSA to work with the NPS as well as other Section 106 Consulting Parties to further minimize impacts to the NHL in accordance with GSA’s Section 106 Programmatic Agreement.