



# Executive Director's Recommendation

Commission Meeting: October 1, 2020

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<b>PROJECT</b> <b>The Department of Homeland Security Headquarters Consolidation at St. Elizabeths Master Plan Amendment 2</b> St. Elizabeths West Campus 2707 Martin Luther King Jr Avenue, SE Washington, DC	<b>NCPC FILE NUMBER</b> MP211
<b>SUBMITTED BY</b> United States General Services Administration	<b>NCPC MAP FILE NUMBER</b> 83.10(05.00)45195
<b>REVIEW AUTHORITY</b> Approval of Master Plans for use by the Commission per 40 U.S.C. § 8722(a) and (b)(1)	<b>APPLICANT'S REQUEST</b> Approval of final master plan amendment
	<b>PROPOSED ACTION</b> Approve final master plan amendment with comments
	<b>ACTION ITEM TYPE</b> Consent Calendar

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## PROJECT SUMMARY

The U.S. General Services Administration (GSA) has submitted the final master amendment for the Department of Homeland Security (DHS) Headquarters consolidation at St. Elizabeths Hospital West Campus. The 2008 Master Plan, approved by the Commission in 2009, for the Consolidated Headquarters of DHS (2008 DHS Master Plan) established the framework for a total development of 4.5 million gross square feet (GSF) on both the West and East Campuses, including administrative and operations space, and shared uses such as a cafeteria, child care center and other uses. The proposed amendment is needed to address budget constraints and new programming requirements for DHS. The Commission provided comments on the draft amendment at concept review in November 2019, and again at draft review in July 2020. GSA has addressed the Commission's comments, and the final submission has not changed significantly since draft review. The National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) processes have been concluded.

The St. Elizabeths West Campus is a 176-acre site on the western side of Martin Luther King, Jr. (MLK) Avenue in Southeast Washington, DC. After determining that it no longer had a need for the property, the United States Department of Health and Human Services, which had operated the St. Elizabeths Psychiatric Hospital, declared the St. Elizabeths West Campus as excess in January 2001. GSA took control of the property for redevelopment in December 2004. The East Campus is owned by the District of Columbia. The entire St. Elizabeths Campus is a National Historic Landmark (NHL).

GSA's goal with the draft amendment is to update the Master Plan with a focus on the Plateau area on the West Campus to provide maximum flexibility for current and future department programming and optimize new development within the historic context of the campus. The amendment also addresses GSA's directive to maximize new construction, providing greater

square footage at a lower cost. Beginning in Spring of 2018, GSA engaged federal agencies and the Section 106 Consulting Parties to evaluate different height and massing options for the new construction on the West Campus. In order to achieve the square footage goals for the new programming, GSA and the Consulting Parties evaluated the merits of three to six buildings, of varying mass and height configurations, targeting the western edge of the Lawn on the Plateau for location. The Plateau is located on the southeast corner of the West Campus, with Martin Luther King, Jr. Boulevard to the east. The preferred design option under the amendment envisions two large-scale buildings, each approximately 600,000 square feet, on the Plateau but sited in such a manner as to retain the historic open space of the Lawn on the Plateau, and provide a new landscaped plaza within the ravine, behind the historic Power Plant buildings. This amendment also includes locating a new 175,000 square foot building (I & A Building) on top of the hill from the historic cemetery (Sweetgum Lane site), and near the Munro Building, housing the Coast Guard headquarters. GSA has indicated this building will be largely underground.

## KEY INFORMATION

- The St. Elizabeths Hospital Campus was listed as a National Historic Landmark in 1990.
- The Department of Health and Human Services transferred the property to GSA in 2001.
- In January 2009, the Commission approved the campus master plan. One of the main goals of the master plan was to retain as much of the historic fabric of St. Elizabeths West Campus as possible.
- A Programmatic Agreement (PA) signed in 2008 outlined the process for historic preservation.
- Since the 2009 Master Plan approval, the Commission has seen two master plan amendments: one in 2010 to amend the area of the plan for the U.S. Coast Guard Headquarters and one in 2012 to relocate FEMA to the east campus.
- The 2009 Master Plan for St. Elizabeths established a framework for 4.5 million gross square feet of office/support space between existing and new development to house DHS. It also included an additional 1.5 million gross square feet of parking.
- GSA has completed several components of the original 2009 Master Plan, including the construction of the Munro Building to serve as the Coast Guard Headquarters, an adjacent parking garage, the complete rehabilitation of the historic Center Building to house the offices of the Secretary of DHS, a western addition to the Center Building, and several rehabilitations of smaller historic buildings on the West Campus.
- Since the 2009 approval, GSA has determined that due to inefficient floorplates across the campus and current requirements, the ratio for Usable Square Footage (USF) to Gross Square Footage (GSF) is 2.0+ versus the original planned 1.3. Since 2009, the construction costs have also increased, partly due to funding delays, as well as the actual cost to rehabilitate the historic Center Building.
- GSA reinitiated Section 106 Consultation in 2018 and had held seven Consulting Party Meetings to date. A new Memorandum of Agreement (MOA) was executed to document the mitigation measures agreed upon during the Consultation Process resulting from the anticipated adverse effects resulting from the components of the amendment to the Master Plan.

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- Five historic buildings will be demolished on the Plateau area, while the historic buildings of Administration Row, and three additional historic buildings (including the Ice House, the Power Plant and the Smoke Stacks) will be retained.
  - GSA prepared a Supplemental Environmental Statement (SEIS) for NEPA purposes to evaluate potential changes resulting from the amendment to the Master Plan.
  - The Commission provided comments on the concepts for the draft amendment to the Master Plan at its November 2019, followed by comments on the draft master plan in July 2020.
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## RECOMMENDATION

The Commission:

**Approves** the final Master Plan Amendment 2 for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths, located at 2707 Martin Luther King Jr Avenue, SE in Washington, DC.

**Notes** individual buildings and landscapes will be designed at the individual project stage and submitted for Commission review and approval.

**Notes** that the applicant has committed to ensure that historic buildings will not be demolished prior to the need to facilitate the construction of new buildings.

**Notes** that the applicant has committed to follow National Park Service guidance found in Preservation Brief 31: Mothballing Historic Buildings, for the stabilization of the remaining historic buildings while demonstrating the commitment to identify future new uses for the building to encourage rehabilitation.

**Notes** that a Memorandum of Agreement (MOA) was prepared and executed pursuant to Section 106 of the National Historic Preservation Act that describes the process and steps necessary for further consultation regarding the individual projects implemented as part of the master plan.

**Notes** the applicant has committed in the Section 106 MOA to evaluate Building 69 to determine if it can be feasibly retained and used as federal government office space, and will report findings to the Section 106 Consulting Parties in writing, and will consider their comments on the findings.

**Notes** that pursuant to the National Environmental Policy Act, GSA released the Final Environmental Impact Statement on August 28, 2020 and a Record of Decision (ROD), based upon the preferred alternative, was prepared.

**Adopts** the Record of Decision (ROD) for the St. Elizabeths Master Plan Amendment 2 Final Supplemental Environmental Impact Statement.

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## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	<p><b>July 2020</b> - Commission commented on Draft Master Plan Amendment</p> <p><b>November 2019</b> – Commission commented on concepts for Draft Master Plan Amendment</p> <p><b>January 2009</b> – Approval of final DHS Consolidated Master Plan</p> <p><b>July 2010</b> – Approval of US Coast Guard Headquarters and master plan modification.</p> <p><b>June 2012</b> – Approval of Master Plan Amendment – Federal Emergency Management Agency Headquarters and Transportation Improvements</p>
<b>Remaining actions</b> (anticipated)	– Submittal of individual projects within the master plan

## PROJECT ANALYSIS

### Executive Summary

The U.S. General Services Administration (GSA) has submitted the final master plan amendment for the Department of Homeland Security (DHS) Headquarters consolidation at St. Elizabeths Hospital West Campus. Staff analyzed this project using guidance in the Comprehensive Plan, particularly those related to five of the 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 it to be in conformance with the goals and policies associated with each Element.

The St. Elizabeths West Campus is a 176-acre site on the western side of Martin Luther King, Jr. (MLK) Avenue in Southeast Washington, DC. After determining that it no longer had a need for the property, the United States Department of Health and Human Services, which had operated the St. Elizabeths Psychiatric Hospital, declared the St. Elizabeths West Campus as excess in January 2001. The General Services Administration (GSA) took control of the property for redevelopment in December 2004. The East Campus is owned by the District of Columbia. The entire St. Elizabeths Campus is a National Historic Landmark (NHL).

Recognizing the need to amend the approved Master Plan, GSA reinitiated the Section 106 Consultation process, to engage the federal agencies and consulting parties, and the public in summer of 2018, and held seven Consulting Party meetings. A Memorandum of Agreement (MOA) was prepared and executed to address adverse effects resulting from the implementation of the master plan. NCPC is a signatory to the MOA.

GSA's goal with the draft amendment is to update the Master Plan with a focus on the Plateau area on the West Campus, to provide maximum flexibility for current and future department

programming, and optimize new development within the historic context of the campus. The Plateau is located on the southeast corner of the West Campus, with Martin Luther King, Jr. Boulevard to the east. The amendment also addresses GSA's directive to maximize new construction and provide more square footage, for less costs. Beginning in Spring of 2018, GSA engaged federal agencies and the Section 106 Consulting Parties to evaluate different height and massing options for the new construction on the West Campus. In order to achieve the square footage goals for the new programming, GSA and the Consulting Parties evaluated the merits of three to six buildings, of varying mass and height configurations, targeting the western edge of the Lawn on the Plateau for location. The preferred design option under the amendment envisions two large-scale buildings, each approximately 600,000 square feet, on the Plateau but sited in such a manner as to retain the historic open space of the Lawn on the Plateau, and provide a new landscaped plaza within the ravine, behind the historic Power Plant buildings. This amendment also includes locating a new 175,000 square foot building on top of the hill from the historic cemetery (Sweetgum Lane site), and near the Coast Guard building. GSA has indicated this building will be largely underground.

The applicant has worked closely with NCPC staff and the consulting parties throughout the development of the master plan to address major planning issues, particularly related to historic preservation. The applicant has committed to ensure that historic buildings will not be demolished prior to the need to facilitate the construction of new buildings. In addition, buildings and landscapes within the master plan will be designed at the individual project stage and will be submitted for Commission review and approval. Therefore, staff recommends the **Commission approves the final Master Plan Amendment 2 for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths, located at 2707 Martin Luther King Jr Avenue, SE in Washington, DC.**

### **Analysis**

The final master plan is substantially consistent with the draft reviewed in July 2020. Additional information has been provided per the Commission's discussion. In particular, the Commission requested GSA explore designs for new construction at the Building 69 that provide a focal point and axial relationship with the historic Hitchcock Building. As a reminder, Building 69 is quite close to the exterior perimeter wall does not meet the minimum required offset distance and could require extensive modifications. The applicant has committed in the Section 106 Memorandum of Agreement (MOA) to evaluate if it can be feasibly retained and used as federal government office space, and will report findings to the Section 106 Consulting Parties in writing, and will consider their comments on the findings.

Building 69 establishes a focal point on the southern end of the Lawn on the Plateau, and an axial balance to the Hitchcock Building on the northern end of the Lawn. If the building is removed, a new focal point or axial relationship should be created. GSA has provided an updated diagram that shows how a new axial relationship could be created between Hitchcock Hall and a new signature building (B2). The new building alignment and massing would create a new focal point. Additional details regarding the architecture and building materials would be developed at the individual project stage.

Overall, staff finds the response sufficient for the master plan level of development. Building 69 will first be evaluated for retention if an appropriate use can be identified. If the building is ultimately removed, the opportunity exists for a new visual and axial relationship to be created with Building B2, as demonstrated in the diagram. As individual projects within the master plan will be submitted to the Commission for review and approval, additional discussions regarding the design approach will occur in the future.

In addition, the applicant has committed to follow National Park Service guidance found in Preservation Brief 31: Mothballing Historic Buildings, for the stabilization of the remaining historic buildings while demonstrating the commitment to identify future new uses for the building to encourage rehabilitation. Further, the applicant has committed to ensure that historic buildings will not be demolished prior to the need to facilitate the construction of new buildings.

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

### **Comprehensive Plan for the National Capital**

Staff analyzed this project using guidance in the Comprehensive Plan, particularly those related to five of the 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 it to be in conformance with the goals and policies associated with each Element.

### **National Historic Preservation Act**

Both GSA and NCPC have compliance responsibilities for Section 106 under the National Historic Preservation Act, with GSA serving as lead agency for the Section 106 consultation. GSA has prepared a Memorandum of Agreement (MOA) that has been executed to document the agreed-upon mitigation measures related to adverse effects to historic resources for the master plan amendment. NCPC is a signatory to the MOA.

### **National Environmental Policy Act**

Both GSA and NCPC have responsibilities for compliance under the National Environmental Policy Act. GSA prepared a draft Supplemental Environmental Impact Statement which was released for public comment through July 16, 2020. GSA released the Final Supplemental Environmental Impact Statement on August 28, 2020 for a 30-day review period. A Record of Decision (ROD), based upon the preferred alternative, was also prepared. The ROD provides an overview of the NEPA process related to the master plan, and a summary of the proposed mitigation commitments by GSA. Both GSA and NCPC have independent NEPA responsibilities. NCPC has approval authority for the individual projects located within the master plan. Therefore, to conclude the NEPA process, staff recommends the **Commission adopt the Record of Decision**

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**(ROD) for the St. Elizabeths Master Plan Amendment 2 Final Supplemental Environmental Impact Statement.** A copy of the draft ROD is attached.

## **CONSULTATION**

### **Coordinating Committee**

The Coordinating Committee reviewed the final master plan at its September 9, 2020 meeting. Without objection, the Committee forwarded the proposed comments on the draft master plan to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Department of Transportation (DDOT); the District of Columbia Department of Energy and Environment; the General Services Administration; the District of Columbia State Historic Preservation Office (SHPO); the National Park Service and the Washington Metropolitan Area Transit Authority. DDOT noted continuing work with GSA on the final cross section of Martin Luther King Jr. Boulevard, and the transportation demand management program. DOEE noted its continuing coordination with GSA on stormwater management.

### **U.S. Commission of Fine Arts**

The U.S. Commission of Fine Arts (CFA) approved the final Master Plan Amendment 2 for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths at their September 17, 2020 meeting.

## **ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package
- NCPC Draft Record of Decision

Prepared by Matthew Flis  
09/24/2020

## **POWERPOINT (ATTACHED)**

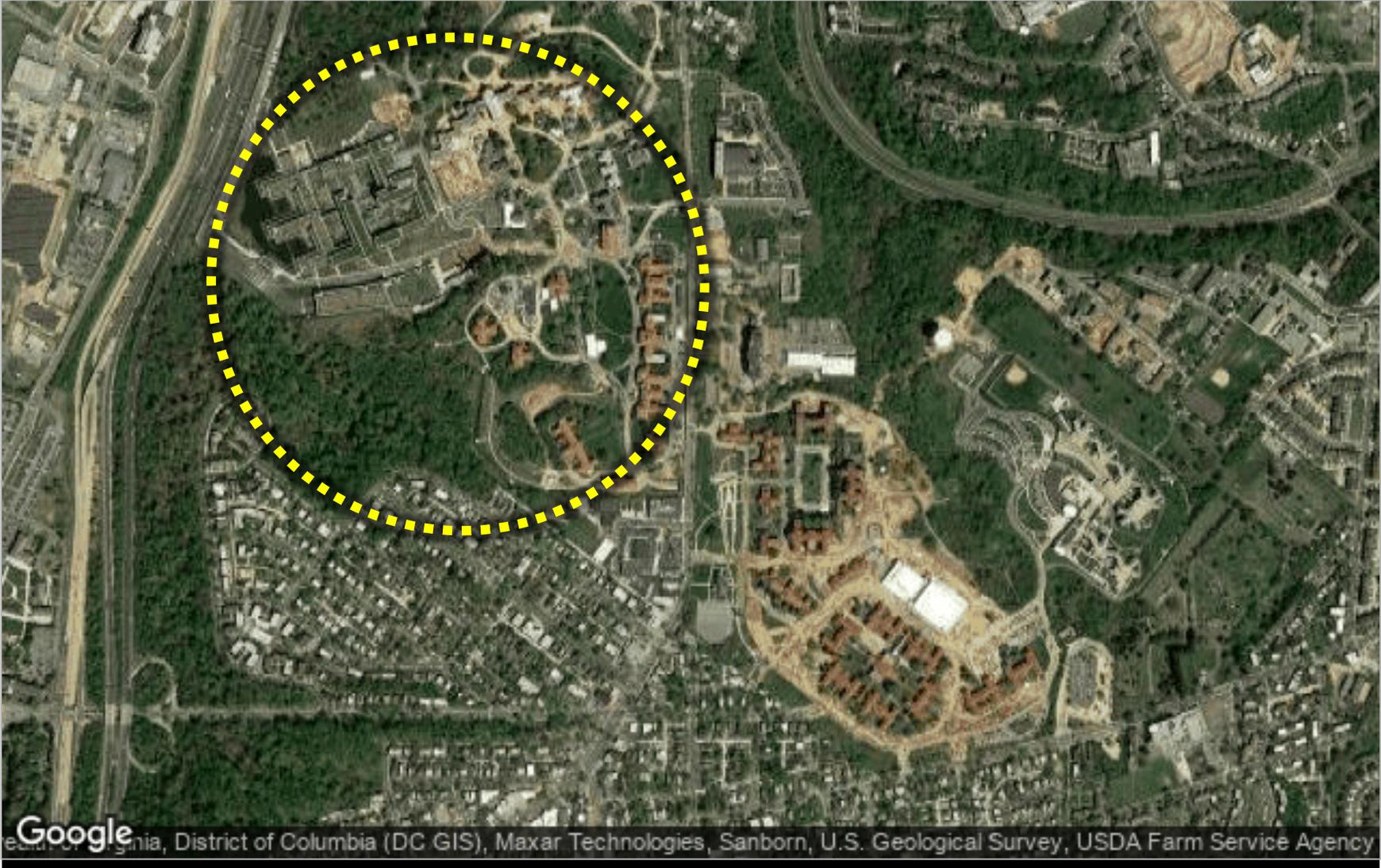
# The DHS Headquarters Consolidation at St. Elizabeths Master Plan Amendment 2

2707 Martin Luther King Jr Avenue, SE, Washington DC

Approval of Final Master Plan Amendment

United States General Services Administration

# Site Location



# Program and Design Requirements

## III. AMENDMENT 2 PROGRAMMATIC REQUIREMENTS AND DESIGN PARAMETERS

### Amendment 2 Overview

Amendment 2 is a focused update to define areas for new construction on the plateau and Sweetgum Lane sites. The programmatic need to house the critical elements of DHS' constituent components on a unified Campus is to be met with the 2008 West Campus Master Plan as further defined with this Amendment 2, Figure 3.1.

### GSA/DHS Mission

GSA is consolidating DHS headquarters at the West Campus with a focus on three major policy goals:

- Meet the National Capital Region demand for housing federal agencies requiring a secure setting;
- Maintain and augment the location of major government agencies within the District of Columbia;
- Maintain and preserve St. Elizabeths as a NHL.

Other goals of the DHS Consolidation have been described in the 2008 Master Plan and the preceding sections of this Amendment 2.

Within these goals, the major objectives of the Master Plan are to provide a high-performance workplace for the federal government, a maximum build out to provide an economically feasible development including restoration and reuse of historic structures and landscape, a development that will serve a particular tenant, and also a reasonable real estate strategy for changes of tenants in the future.

### DHS Program Requirements

The programmatic need to house the critical elements of DHS' constituent components on a unified Campus is met with the 2008 West Campus Master Plan and this Amendment 2. Within the overall campus program, the exact fit of function to space provided will be determined by final programming. It should be assumed that the detail of programmatic needs within any of the components on campus will need to include the ability to adjust to changing organizational requirements over the coming years with the implementation of individual components of the Master Plan.

Master Plan Program Summary	2008 Master Plan			2012 Master Plan Amendment 1			2020 Master Plan Amendment 2			Cumulative Results	
<b>Personnel Assigned</b>			14,000			14,000			14,900	+6.4%	
									Standard shift DHS	13,750	
									Non-Standard shift DHS	750	
									GSA Support & Contractors	400	
<b>Development &amp; Parking</b>	Above Grade	Below Grade	Total GSF	Above Grade	Below Grade	Total GSF	Above Grade	Below Grade	Total GSF		
West Campus Building Development	3,228,474	601,912	3,830,386	3,228,474	601,912	3,830,386	3,480,784	661,956	4,142,740	+8%	
East Campus Building Development	619,939	95,133	715,072	650,000	100,000	750,000			0	-100%	
<b>Total Building Development GSF</b>	3.8M	0.7M	4.5M	3.8M	0.7M	4.5M	3.4M	0.7M	4.1M	-9%	
West Campus Parking Structures	478,900	737,600	1,216,500	478,900	737,600	1,216,500	478,900	1,112,900	1,591,800	+30%	
East Campus Parking Structures	271,250		271,250	271,250		271,250			0	-100%	
<b>Total Parking Structures GSF</b>	0.8M	0.7M	1.5M	0.8M	0.7M	1.5M	0.5M	1.1M	1.6M	+6%	
West Campus Parking Spaces	2,090	1,369	3,459	2,090	1,369	3,459	2,090	2,358	4,448	+29%	
East Campus Parking Spaces		775	775		775	775			0	-100%	
<b>Total Parking Spaces</b>	2,090	2,144	4,234	2,090	2,144	4,234	2,090	2,358	4,448	1:3.9 Employee Parking Ratio	
									Standard shift DHS	3,438	1:4 Parking Ratio
									Non-Standard shift DHS	250	1:3 Parking Ratio
									GSA Support & Contractors	75	1:5 Parking Ratio
									Campus Visitors	525	
									Government Vehicles	160	
<b>Total GSF</b>	4.6M	1.4M	6M	4.6M	1.4M	6M	3.9M	1.8M	5.7M	-5%	

Figure 3.1 - Program Summary. The table above provides a summary comparison between the 2008 Master Plan, Amendment 1 which is now voided, and Amendment 2 for: Personnel Assigned, Total Building Development GSF, Total Parking Structures GSF, Total Parking Spaces, and Total Campus GSF.

# Existing Campus

## The St. Elizabeths West Campus Today

Since the approval of the 2008 Master Plan, several projects have been implemented, with some projects approved though not yet implemented.

Currently all of the buildings have been stabilized and are in varying states of deterioration. Some of the buildings are in fair condition, while some are in very poor condition with rotted floors and deteriorating walls. Today, with the 2019 completion of the Center Building, the West Campus is partially occupied.

Projects that have been completed, or are in progress include:

### Buildings:

- Center Building (1-8)
- Atkins Hall (31)
- Dining Hall & Kitchen (33, 34)
- Hitchcock Hall (37)
- Construction Shops (49)
- Gymnasium (48)
- Douglas A. Munro Building (50)
- DOC - partially complete (51)
- West Addition
- Child Development Center (208)
- Central Utility Plants 1 (58) & 2 (CUP2)
- Gatehouses 1 (21) & 2 (78)
- Gates 3, 4, 5 & 6 and related Screen Facilities
- Gate 4 Parking Garage (35)

### Roadway and Site Improvements:

- Firth Sterling Intersection (A)
- On-Site Access Road (B)
- I-295 / Malcolm X Avenue SE Interchange (C)
- Landscaping and internal roadway repaving
- Slope stabilization and stormwater management

Some of the projects that were included in the 2008 Master Plan, though are not yet completed include:

- Administration Buildings (71-75)
- Gates 1 & 2 Parking and Screening (PG1 & 2)
- Allison Cluster (23-26)
- The Warehouse (F2)

### LEGEND - PROJECT STATUS KEY

- Project completed
- Project underway
- Project in future
- Roadway Improvement Project

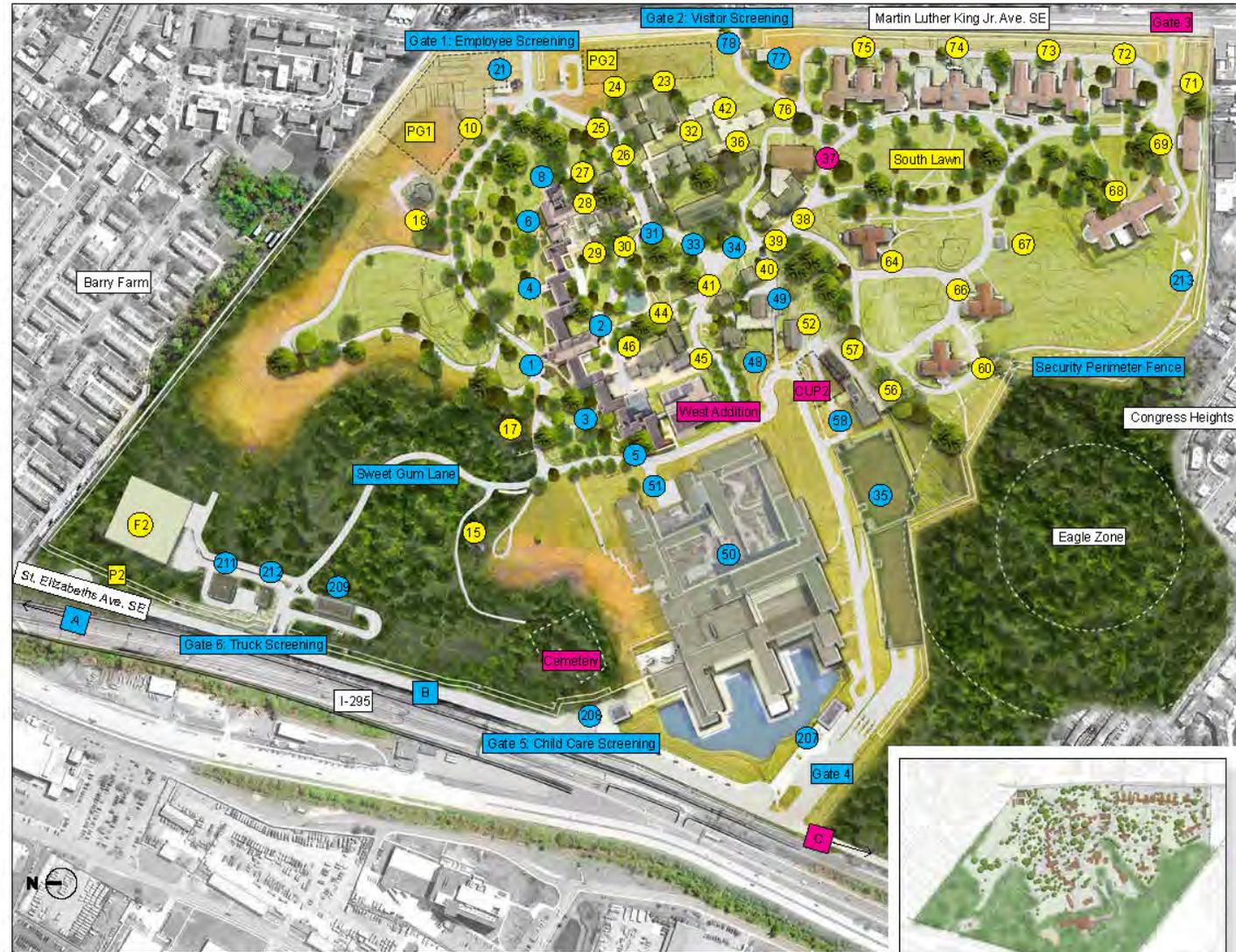


Figure 4.1 - St. Elizabeths West Campus plan

Image at lower right: Figure 4.13 - Existing St. Elizabeths West Campus Plan from the 2008 Master Plan

# Historic and Visual Resources

## Historic and Visual Resources

The historic resources of the existing St. Elizabeths West Campus NHL consist of three main elements: buildings, landscapes, and views. These are extensively described in the 2008 Master Plan.

### Contributing and Non-contributing Buildings

There are currently 69 existing buildings located on the St. Elizabeths West Campus, 57 of which are identified as contributing to the NHL. They are arranged in the following two principle groupings:

The first and older grouping was constructed between 1852 and 1899. It is dominated by the large Gothic Revival Center Building and occupies the bluff overlooking the confluence of the Potomac and Anacostia Rivers. These buildings illustrate two seminal approaches to the treatment of the mentally ill: the early Kirkbride plan of individual patient rooms combined with treatment, staff, dining, and recreational facilities in a single building; and the cottage plan of dormitory-style living facilities, separated from treatment, dining, and recreational. Both types of facilities separated patients by gender and type of illness. Both relied on the thoughtful setting of buildings in natural surroundings and on the therapeutic benefits of the landscaped grounds.

The second grouping dates from the early 1900s and was built as part of a major congressionally-funded expansion. These buildings are configured as cottage style facilities, and their placement was influenced by the ideas of Olmsted and Associates, the successor to Frederick Law Olmsted's renowned landscape architecture firm.

In addition to treatment and residential facilities, the contributing buildings include support structures, such as the Bakery, Power House and Ice House, Staff Residences, and Administrative buildings.

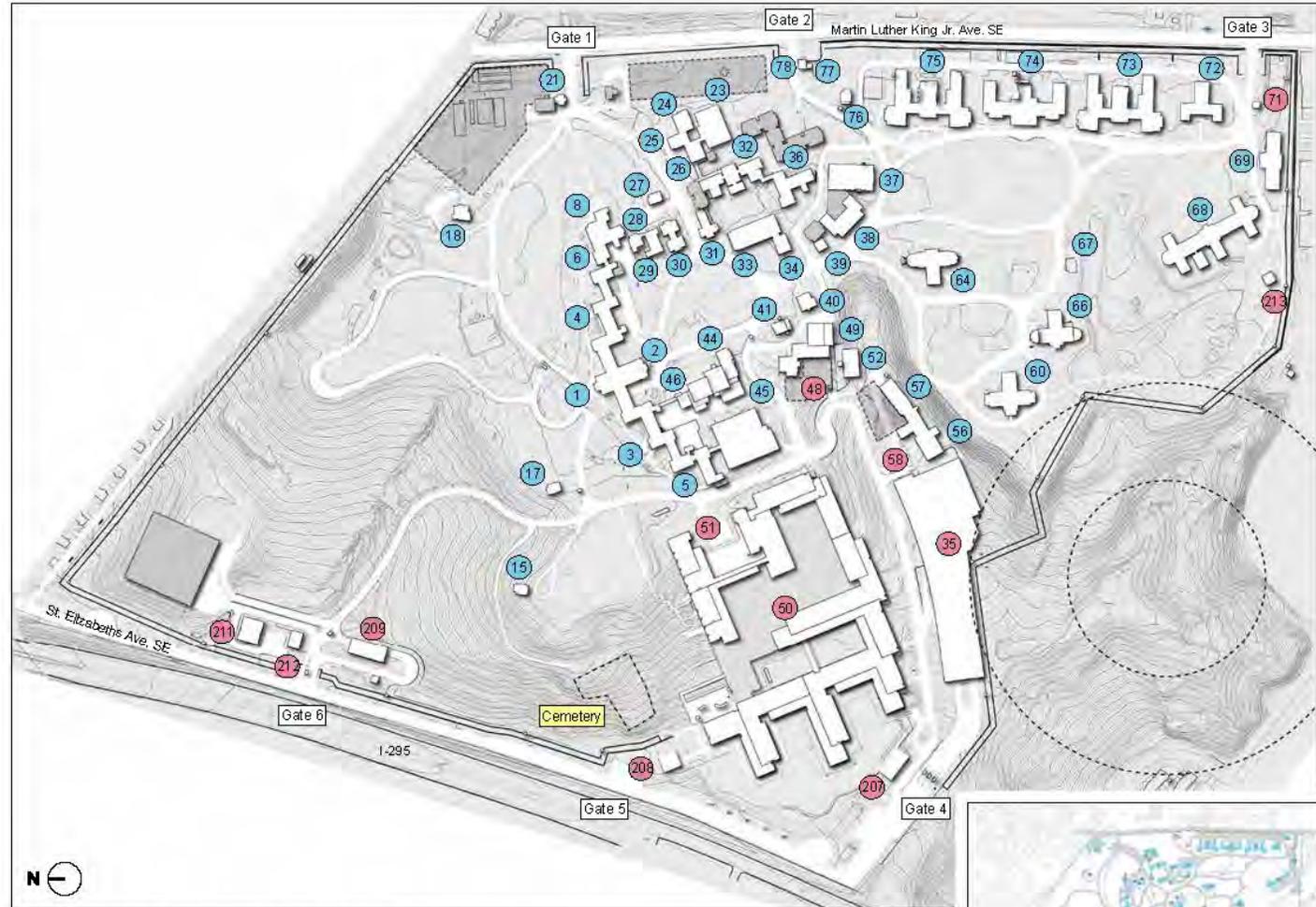


Figure 4.2 - Contributing and non-contributing buildings plan  
Image at lower right: Figure 4.18 - Historic Building Analysis from the 2008 Master Plan

### LEGEND

- # Contributing buildings
- # Non-contributing buildings
- Cemetery

# Contributing Buildings – Removed and Retained

## Contributing Buildings Located on the Plateau and Sweetgum Lane Sites

During the development of the alternative concepts, GSA, DHS, and stakeholder agencies, including the DC State Historic Preservation Office, the National Capital Planning Commission, and the U.S. Commission of Fine Arts re-evaluated the plateau area and the Sweetgum Lane site to identify which contributing buildings were most critical for preservation and adaptive re-use.

### Plateau Site

The preliminary consensus was that Buildings 64, the Power Plants (56 & 57), and the Smoke Stacks were the most physically defining contributing buildings that should be retained. In contrast, Buildings 60, 66, 67, 68 and 69, while contributing, were evaluated as buildings that could be considered for removal due to several factors: soils stabilization requirements, their location on the site, other buildings on the Campus represent their particular time period and architectural significance, building deterioration or difficulty in adaptive reuse. Building 69's proximity to the exterior perimeter wall and the new school that has been developed since 2008, on the adjacent property, does not meet the minimum required offset distance and could require extensive modifications. These findings were shared with the Consulting Parties for use in developing the conceptual alternatives and the Preferred Alternative included in this Amendment 2.

### Sweetgum Lane Site

During test fits of the 175,000 GSF facility on the Sweetgum Lane site, it was identified that Building 15 was not a candidate for adaptive reuse due to size, location and deterioration. Please refer to Figure 4.2 for Building 15 site context near the Douglas A. Munro Building.

### Section 106

Concurrent with the Amendment 2 process, the Section 106 process, meeting with the Consulting Parties, assessed the adverse effects for these two sites, to define potential mitigation and an update to the first Programmatic Agreement.

### LEGEND

- To Be Removed
- Existing to Remain

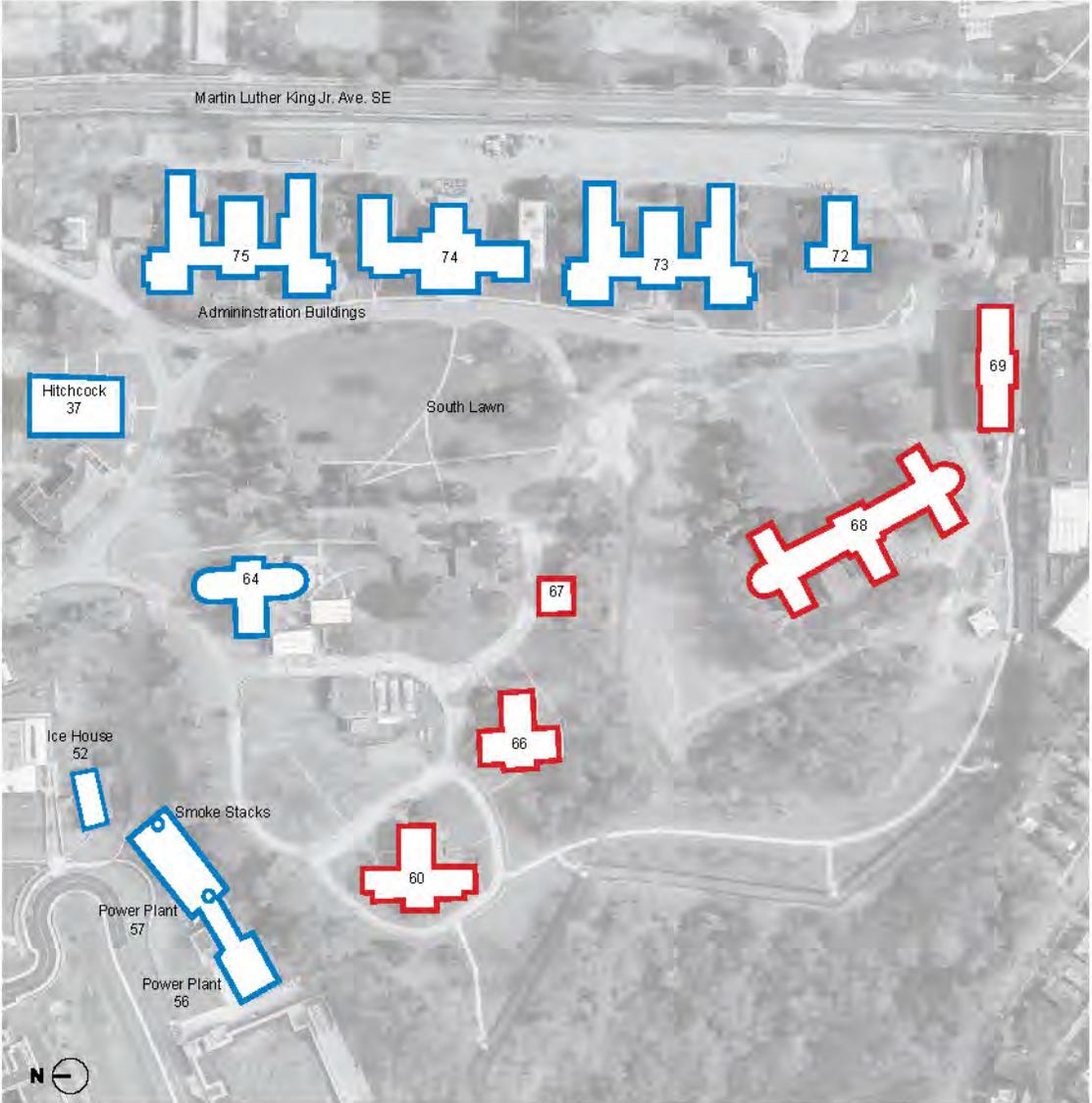


Figure 4.3 - Plateau Site - Building Summary

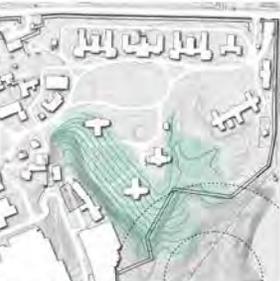


Figure 4.4 - Plateau Site - Area impacted by potential 6:1 Slope Stabilization shown in Green



Figure 4.5 - Plateau Site - Extent of Fly Ash shown in Red

# Site and Development Program

**Site and Development Program - 2008 to 2020**

**Site Parcels**

Principle: Respect the individual and unique character and history of each site parcel in making redevelopment decisions.

While there have been both the demolition of existing buildings and the addition of new construction on the West Campus, the division of the site into the following five parcels and the intent of this principle remain unchanged from the 2008 Master Plan.

**Site Parcel 1** contains the most significant views towards DC and Virginia, housing the majority of buildings in the historic core including the Center Building, which acts as a focal point for the campus. It also contains the primary gateway to the campus along Martin Luther King Jr. Avenue SE.

**Site Parcel 2** includes the South Lawn surrounded by some of the most important historic structures on the site.

**Site Parcel 3** contains the greenhouses on the upper plateau and a few residences along its steeply-sloped forested areas.

The 2008 Master Plan identified new below-grade parking near Martin Luther King Jr. Avenue SE, and loading along the west edge of the Campus.

**Site Parcel 4** includes the Power House buildings whose stacks can be seen from various regional points beyond the campus.

The 2008 Master Plan identified the Douglas A. Munro Building and structured parking in this zone, both of which have been implemented.

**Site Parcel 5** is heavily forested in steep slopes and contains the cemetery.

The site continues to provide a heavily forested buffer along the steep southern slopes of the campus. The Munro Building and structured parking also occupy part of this parcel.

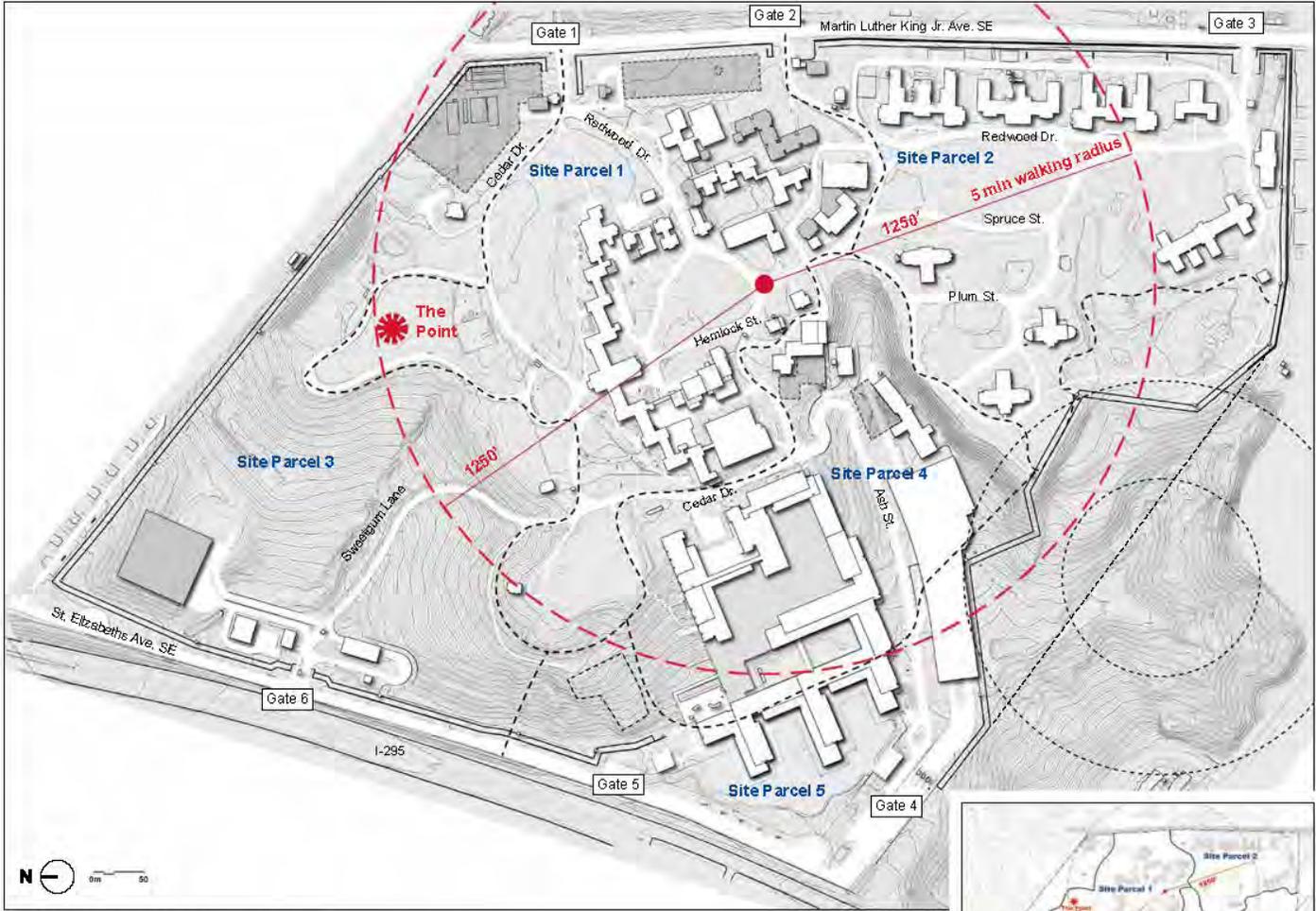


Figure 5.1 - Amendment 2 Site Parcels diagram  
Image at lower right: Figure 5.0 - Planning Site Parcels from the 2008 Master Plan

# Campus Structure and Organization

**Campus Structure and Organization - 2008 to 2020**

Principle: Retain, preserve, and enhance site elements and spaces that define the existing site character.

The intent of this principle remains unchanged from the 2008 Master Plan. However, given that building and site development has evolved, Amendment 2 refines the campus structure and organization for the two sites.

**LEGEND**

- Plateau
- Reinforce Upper Plateau
- Landscape
- The Point, and the Cemetery
- Plateau Front Doors
- Building Frontage
- Direction of Plateau Expansion
- Plateau Axial Relationships



**Figure 5.2 - Amendment 2 Campus Structure and Organization diagram**  
Image at lower right: Figure 5.1 - Campus Structure and Organization from the 2008 Master Plan

# Development Density

## Development Density - 2008 to 2020

Principle: Locate new development density on-site to respect the character of and relationships among the historic resources.

The 2008 Master Plan - guided by the 2006 NCPC *Comprehensive Plan for the National Capital* - established the following three density zones in order to maximize the development of the campus while respecting the character of the existing site and the basic relationship of the existing historic resources to the maximum extent practicable.

### Zone I: Medium Density

Major development including taller structures with larger footprints should be located in this zone. Building heights up to eight floors are appropriate.

### Zone II: Moderate Density

This zone includes the historic core of the campus. Any additional development in this zone should be placed such as to respect the character of the historic buildings, landscapes, and views. Building heights up to five floors are appropriate.

### Zone III: Low Density

This zone is appropriate for low scale development or no development. In some locations, this zone will act as a buffer area between the campus and adjacent residential communities. In other cases, this zone will reinforce the regional character of the site as a part of the topographic bowl. Building heights up to three floors are appropriate.



Figure 5.3 - Amendment 2 Development Density diagram  
Image at lower right: Figure 5.2 - Density Diagram from the 2008 Master Plan

#### LEGEND

- Zone I: Medium Density
- Zone II: Moderate Density
- Zone III: Low Density

# Planning Relationships

## Planning Relationships - 2008 to 2020

Principle: Organize programmatic elements on the site to maximize operational efficiency and effectiveness.

The intent of this principle remains unchanged from the 2008 Master Plan.

A critical element of the site organization is the creation of the appropriate links and adjacencies of program elements to each other. All program elements on site will be related to the campus center and the core shared uses, but the operational relationships among the major components is the critical planning principle for DHS's effectiveness in carrying out its mission.

The campus center will act as the hub of activities common to all the program elements located on the campus. This center will be the point at which personnel from all elements are provided the opportunity to meet, mix, and form a common identity among the operational centers. This opportunity is key to transforming the culture of the many agencies into a single culture that is DHS.

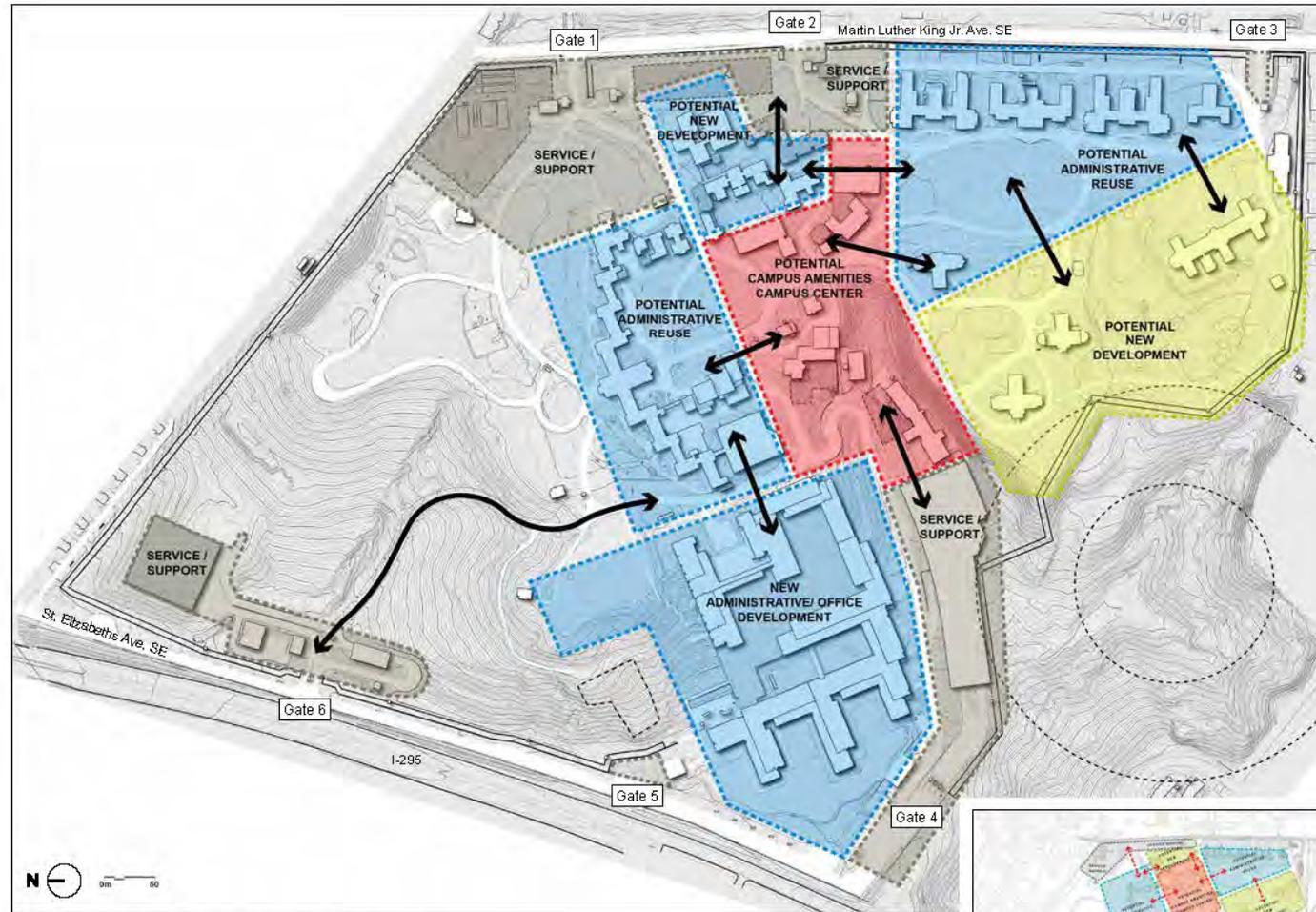


Figure 5.4 - Amendment 2 Planning Relationships diagram  
Image at lower right: Figure 5.3 - Planning Relationships from the 2008 Master Plan

### LEGEND

- New development
- Administrative / office
- Shared facilities
- Service and support

# Landscape Diagram

## Landscape - 2008 to 2020

Principle: Integrate historic landscape and natural features into the Master Plan.

The intent of this principle remains unchanged from the 2008 Master Plan.

The 2008 Master Plan, referencing the 2007 St. Elizabeths West Campus *Cultural Landscape Report (CLR)*, considered the functional aspects of the St. Elizabeths Hospital's historic landscape, as well as the individual features that constituted that landscape. It divided the campus features into the following functional landscape units: therapeutic, ornamental, agricultural, and service.

Throughout these landscape are significant open spaces, such as "the Point" and the South Lawn; clusters of buildings constructed to implement evolving therapeutic philosophies; circulation patterns developed over the hospital's history and the processional experiences these patterns influence; vegetative features, such as the oak allée adjacent to the Center Building; and man-made features, including the cottages, that embody the hospital's history.



Figure 5.5 - Amendment 2 Landscape diagram  
Image at lower right: Figure 5.5 - Historic Resources - Landscape from the 2008 Master Plan

- LEGEND
- Plateau Extents
  - Arboretum
  - Woodlands
  - Main Open Rooms

# Existing Campus Landscape

## Campus Landscape - 2008 to 2020

### Site Environment

Principle: Develop landscape responses that respect the inherent distinctions between different zones of the site while preserving the historic context and restoring ecological functions.

The intent of this principle remains unchanged from the 2008 Master Plan.

The site environment framework must balance the demands of historic and cultural resource protection, environmental and sustainability goals, and the functional requirements of new construction and tenant-specific needs. To do so, the site environment framework depicts these seven zones, each of which will require a different landscape response.

Landscape and cultural resource protection are of primary importance on the plateau. However, because the landscape on the plateau affects the environmental quality of the western slopes, practices on the plateau must address resource management for the wooded slopes. This is particularly relevant for the management of rainwater. Varying approaches to stormwater management, landscape preservation, and habitat restoration will be emphasized depending on the landscape zone.

#### LEGEND

- Plateau extents
- Arboretum
- Woodlands
- Main outdoor rooms
- Courtyards
- Transition landscapes
- Perimeter landscape
- Landscapes over structures



Figure 5.6 - Site Environment diagram  
Image at lower right: Figure 5.12 - Environmental Framework from the 2008 Master Plan

# Existing Site Access and Service

## Site Access and Service - 2008 to 2020

The intent of the following principles remains unchanged from the 2008 Master Plan.

### Access

Principle: Respect and reinforce the historic address for the site on Martin Luther King Jr. Avenue SE.

The main public frontage to the St. Elizabeths West Campus remains along Martin Luther King Jr. Avenue SE which will be the primary regional public "address" for DHS. The existing West Campus entries along Martin Luther King Jr. Avenue SE, Gates 1 and 2, will be upgraded to serve the new garages, potential shuttles and pedestrian entries, while maintaining their historic character to the maximum extent possible. Gate 3 is designated to be used for EMS and emergency purposes only.

Since the 2008 Master Plan, additional ingress/egress to/from the West Campus has been provided via a new access road along the western portion of the site, between Fifth Sterling Avenue SE and the Malcolm X Avenue SE ramp from I-295. Gate 4 is currently a primary employee and visitor entrance. Gate 5 is for Child Development Center drop-off, and Gate 6 is for official vehicle screening and deliveries.

Adequate and efficient access for public transit to the campus should be provided. Public transportation vehicles, bicycles, and pedestrians will have access to the campus at Gates 1, 2, and 4.

### Circulation

Principle: Use historic roadways and paths to reinforce spatial continuity.

The plan should maintain the historic character of the pedestrian circulation within the campus. Employees and visitors accessing the campus by automobile will be immediately directed to parking garages. Within the campus, vehicular circulation will be limited to fully screened vehicles only, including VIPs and internal shuttle buses. The plan encourages primarily pedestrian movement across the campus and the use of the existing campus roadways and campus "loops." These will provide clear access to all areas of the campus and will act as an orienting device for employees and visitors.

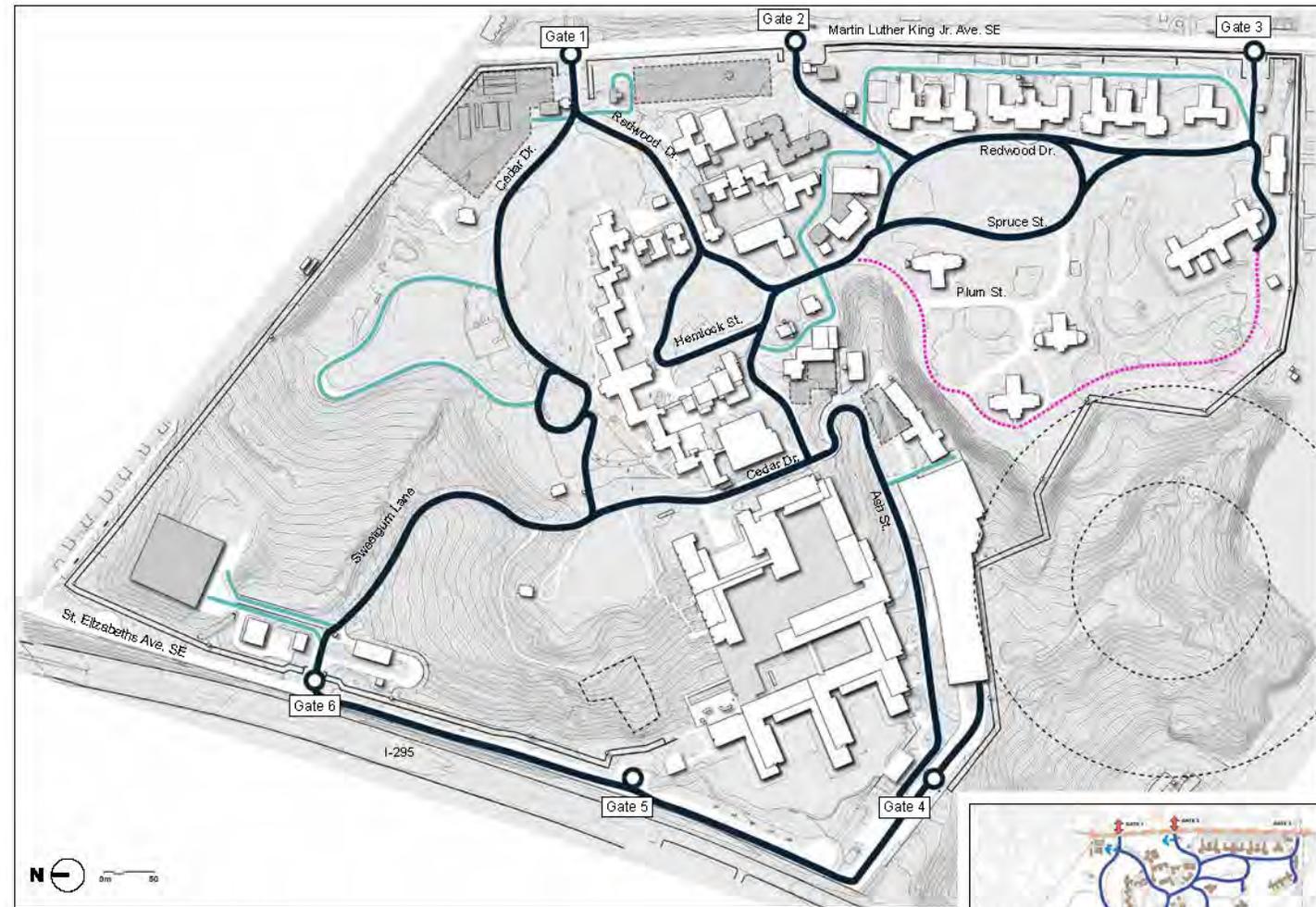


Figure 5.7 - Access and Circulation diagram  
Image at lower right: Figure 5.10 - Site Access and Circulation from the 2008 Master Plan

### LEGEND

-  Gate A access
-  Secondary Vehicular Circulation
-  Current Vehicular Circulation
-  Future Vehicular Access

# Proposed Master Plan Layout

## Master Plan Amendment 2 Site Development Design Drivers

Subsequent to the refinement of the Planning Principles, the Amendment 2 Preferred Alternative proposes revisions to the Master Plan plateau and Sweetgum Lane Sites based on the following Design Drivers developed with input from GSA, DHS, and the Consulting Parties.

### Campus Context:

**Scale:** Consider the total number of buildings, and how building height should address both the South Lawn and the western slope of the plateau.

**Views:** Consideration of important internal and external views is critical.

**Landscape:** The new buildings should be sited to consider outdoor placemaking, and the spaces between buildings.

**Habitat:** The siting of new development should be sensitive to the Topographic bowl and habitat.

### Quality & Operations:

**Workplace Efficiency:** The new development should optimize daylighting for workplace quality, and allow for potential buildings to accommodate flexibility within departments.

**Identity:** The new development should be programmed by department units to accommodate component identity and security.

**Performance:** The new buildings should be sited to maximize solar orientation and daylighting, and heating and cooling efficiency.

### Feasibility:

**Site Soils, Stabilization and Hydrology:** The new development, both buildings and landscape, should be designed to efficiently and effectively ensure stabilization, soil remediation efforts, and prevent potential water infiltration and inundation.

**Cost, Flexibility, and Efficiency:** The new development should be cost-effective and reflect GSA's P100 standards for bay dimensions, cores, and shared spaces.

#### LEGEND

-  Existing Buildings
-  Master Plan & Amendment 2 New Development
-  Below-Grade Development



Figure 6.1 - Amendment 2 - Preferred Alternative

Image at lower right: Figure 6.6 - Illustrative Master Plan from the 2008 Master Plan

# Design Principles

## Plateau Site Design Principles

The Preferred Alternative for the plateau was developed through an iterative process with GSA, DHS, and six Consulting Parties' meetings, based on the following design principles:

### Site Programming

- The new construction should be accommodated into two components (630K GSF and 570K GSF) and consider adaptive reuse of Buildings 56, 57, & 64.

### Plateau Viewsheds

- The buildings should be located toward the western edge of the plateau, and be sited to provide visual porosity from the South Lawn towards the plateau.

### Hitchcock Hall Axial Connection

- With the removal of Building #69 at the south end of the lawn, the new construction has the potential to be a signature building with a visual relationship to Hitchcock Hall.

### Ravine Building & Landscape

- Use the construction of the Ravine Building and adjacent landscape improvements to provide slope stabilization along the Ravine.
- Relate lower massing of new construction to the scale of the adjacent power plant, and explore the integration of new construction foundations and walls with site retaining walls.
- Regrade ravine to create a naturalistic connection to the South Lawn from the north end of the Campus, with places of pause along paths and edges.
- Frame views from the lower Ice House level through the Ravine toward Hitchcock Hall.

### Building Massing and Height

- Focus building height toward the west edge of Plateau and allow for open space between new construction on the South Lawn and the existing Administration Row.

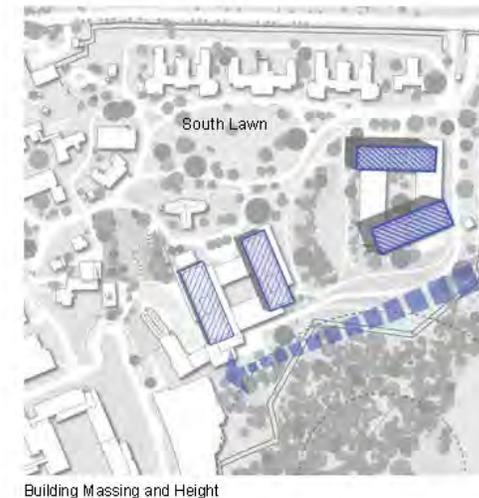
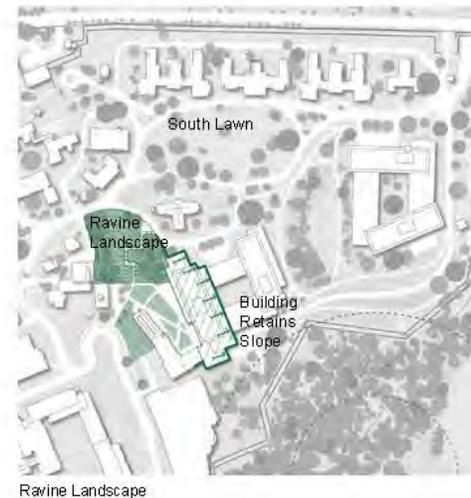
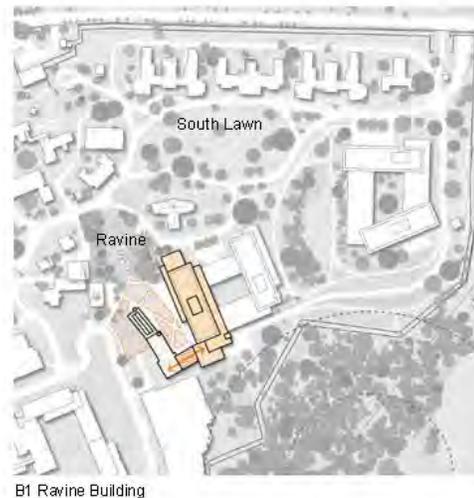
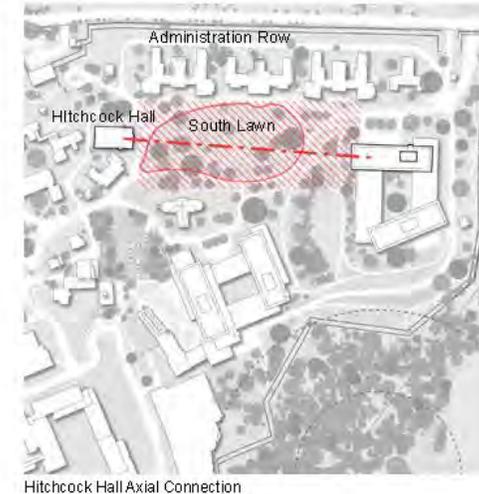
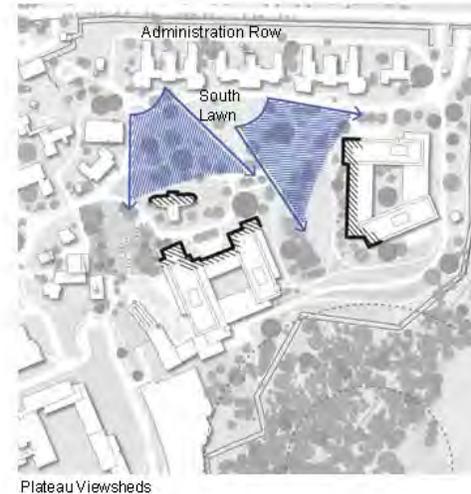
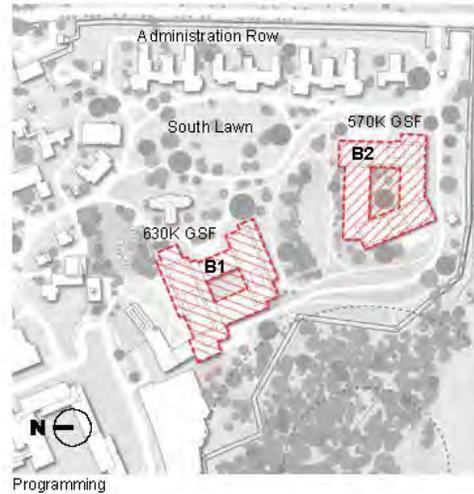
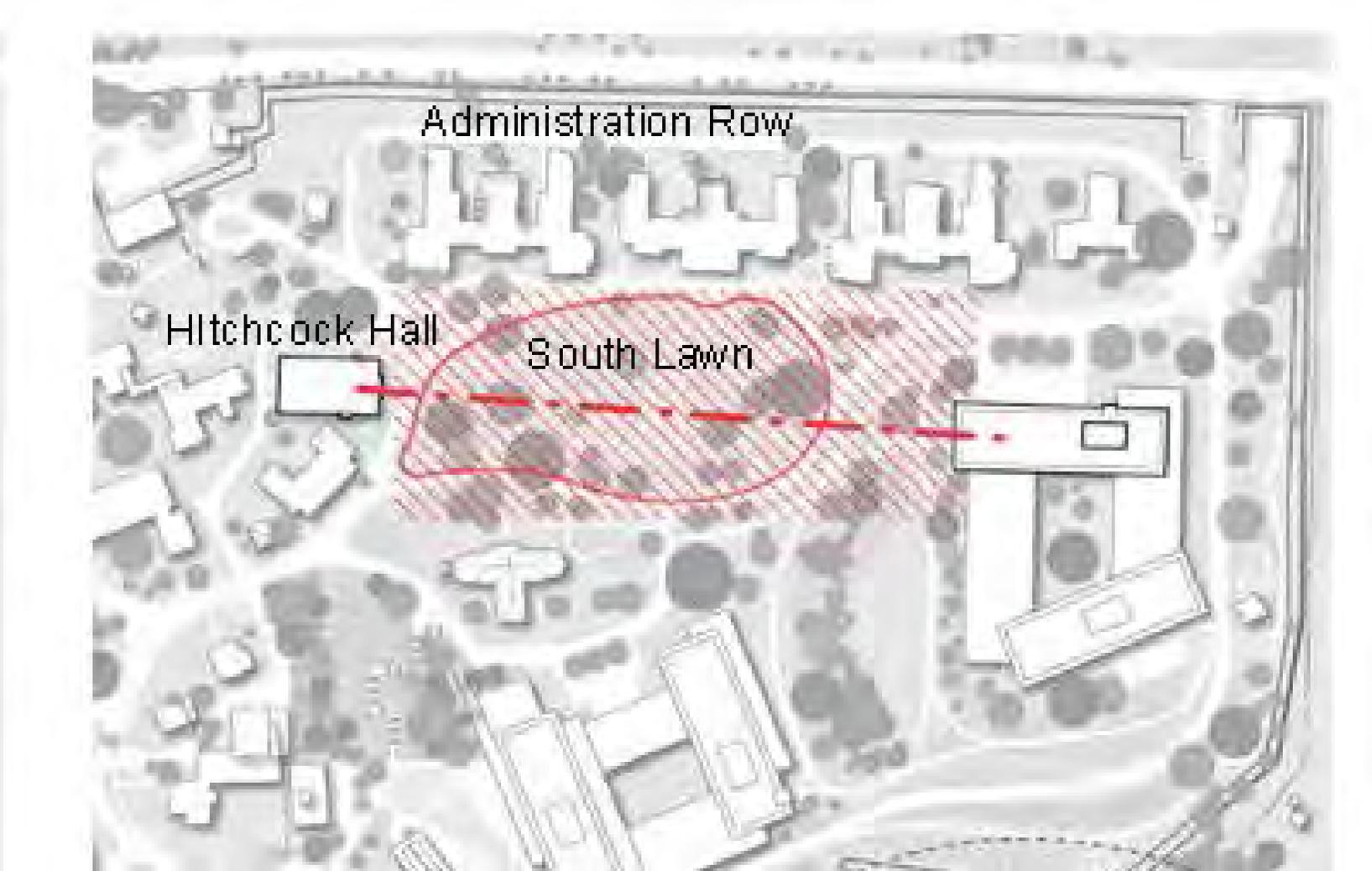


Figure 6.2 - Amendment 2 - Plateau Site Design Principles

# Hitchcock Hall Axial Alignment - Proposed



# Plateau Site Preferred Alternative

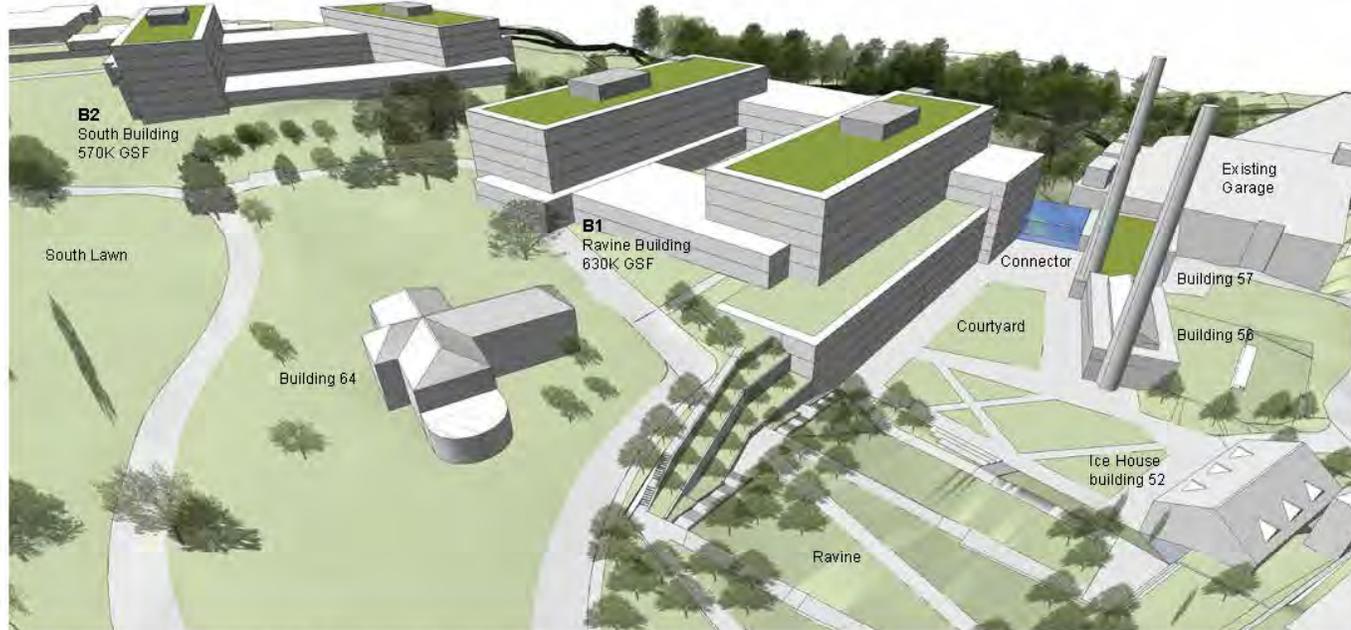


Figure 6.3 - Preferred Alternative Plateau Site - Birds-eye view looking south from above Hitchcock Hall

## Plateau Site - Preferred Alternative

The two-building concept of the Preferred Alternative illustrates the potential maximum gross square footage and height to be developed above ground. During the detailed design phase, should the specific program be evaluated and allow for more below-grade space, the overall building envelopes may be reduced accordingly.

The Ravine Building, to be holistically designed with the landscape, is intended to utilize the building foundations and landscape walls to efficiently stabilize the slope, while also providing daylight workspace. The design will also need to address site hydrology to prevent potential water infiltration into the building. The connector between the Ravine Building and Building 57 should be designed to be architecturally and functionally complementary with the adaptive reuse of Building 57.

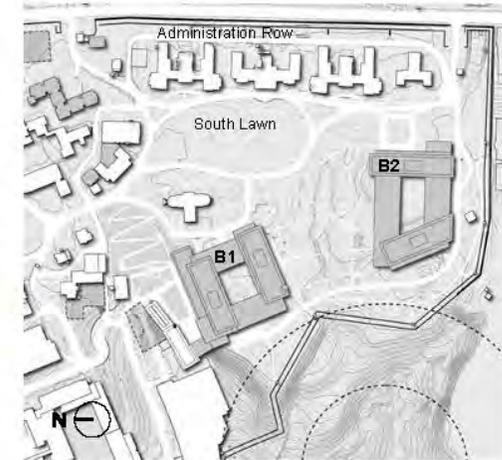


Figure 6.4 - Preferred Alternative Plateau Site Development

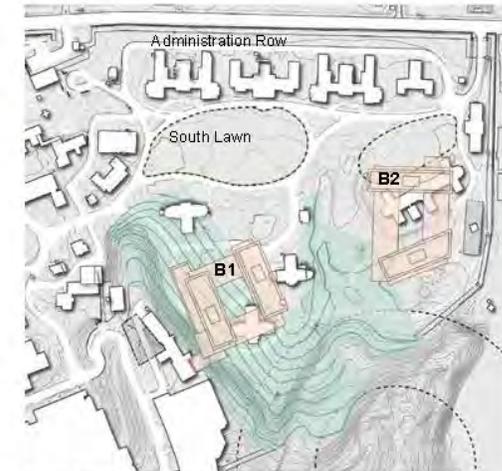


Figure 6.5 - Preferred Alternative Plateau Site Development overlaid on existing conditions and potential soil layback zone

# Plateau Site – South Lawn

### Plateau Site - South Lawn

The Preferred Alternative maintains and reinforces the form of the Existing South Lawn, a key place within the Arboretum landscape characterized by a generous lawn and ample shade trees. The existing and proposed trees provide a healthy canopy long term that reinforce this spatial structure, improves air quality and provides critical shade for pedestrians. These tree plantings also mediate the visual impact of the new construction in relation to the South Lawn, preserving the view from Hitchcock Hall to the trees on the southern portion of the South Lawn.

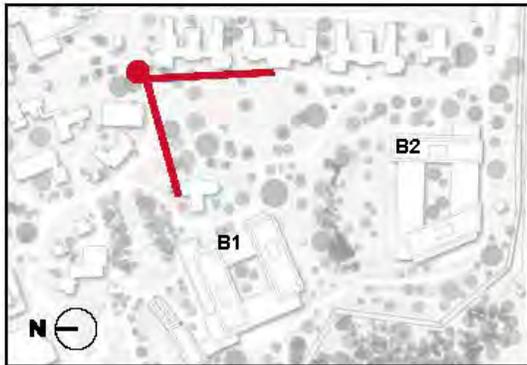


Figure 6.6 - Key Map - Future view toward South Lawn and plateau



Figure 6.7 - Future view across South Lawn toward new construction

# Plateau Site and Ravine Design

## Plateau Site and Ravine Design Concept

The Preferred Alternative preserves the historic Ice House and Power Plant and addresses the unstable slopes along the edge of the plateau through the design of a new building that structures the eastern wall of the Ravine. The dramatic topography of the northern and western slopes of the Ravine are transformed into an accessible connection through a continuous series of sloped paths and landings. Canopy trees frame the view from the top of the slope down to the historic power plant and its dramatic towers and to the Potomac River beyond. It also creates a view of the buildings adjacent to Hitchcock Hall from a new plaza adjacent to the historic power plant. Grass and perennial plantings provide further seasonal interest and encourage the infiltration of stormwater.



Figure 6.8 - View of the Ravine toward Hitchcock, June 2016

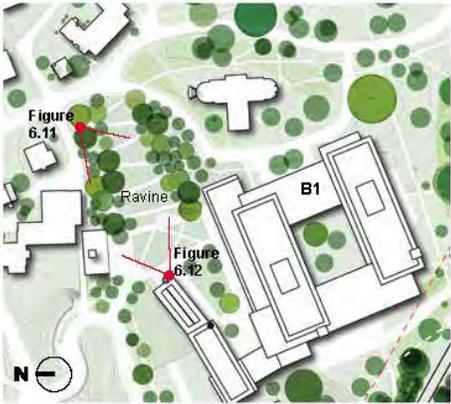


Figure 6.9 - Ravine Plan

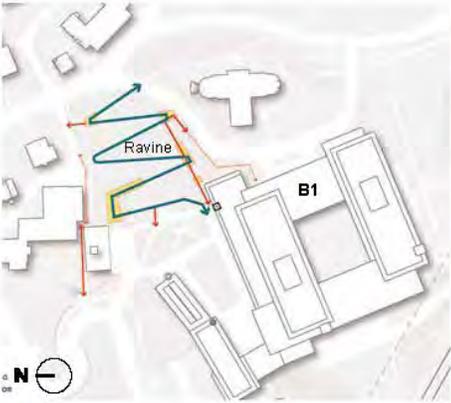


Figure 6.10 - Ravine Landscape Circulation Plan



Figure 6.11 - Future view through enhanced Ravine toward Hitchcock Hall, framed by the Ice House and B1 Ravine Building



Figure 6.12 - Ravine Building and Landscape - Future view from the top of the Ravine toward the B1 Ravine Building and Building #56 & 57

# Sweetgum Lane Site

**Sweetgum Lane Site**

The Preferred Alternative, C1, for the Sweetgum Lane site will accommodate a 175,000 GSF new building with 25,000 GSF above ground, the Headhouse, and 150,000 GSF below grade. The illustrated building's massing is intended to preserve views toward the river from the Center Building and be sensitive and deferential to its relationship and proximity to the Munro Building. The majority of the building's roof will be a green roof similar in grade to the adjacent site so as to minimize the visual impact for this part of the Campus.

The programming of this building requires mission adjacencies to the Center Building and DOC.



**Figure 6.13** - View in 2018 from DHS Secretary's Office in the Center Building (prior to Center Building opening), toward Munro Building and the Sweetgum Lane site (obscured by trees)



**Figure 6.14** - Enlarged Plan of Sweetgum Lane Site Area - Preferred Alternative Additional Sweetgum Lane site studies reviewed with Consulting Parties

# Planning Relationships

## Planning Relationships

While the site and building development have evolved on and around the St. Elizabeths West Campus, this site development plan element remains largely consistent with the intent of the 2008 Master Plan.

Amendment 2 is guided by the Planning Principle that programmatic elements on-site must maximize operational efficiency and effectiveness. The DHS Headquarters program is accommodated within the following planning relationships on the campus.

The focus in Amendment 2 for the campus prioritizes new construction for state-of-the-art office space while continuing the 2008 Master Plan principle to reuse as many of the existing buildings as possible. New buildings will contain agency administrative offices and related spaces.

Existing buildings will contain administrative space as well as the majority of the shared uses.

The locations of uses are based both on-site layout and program adjacency requirements.

The area to the south of the Center Building will serve as a "campus center" where most of the shared uses will be located in existing historic buildings oriented to the enhanced Ravine landscape. This centrally located area will be easily accessible to the employees and visitors.

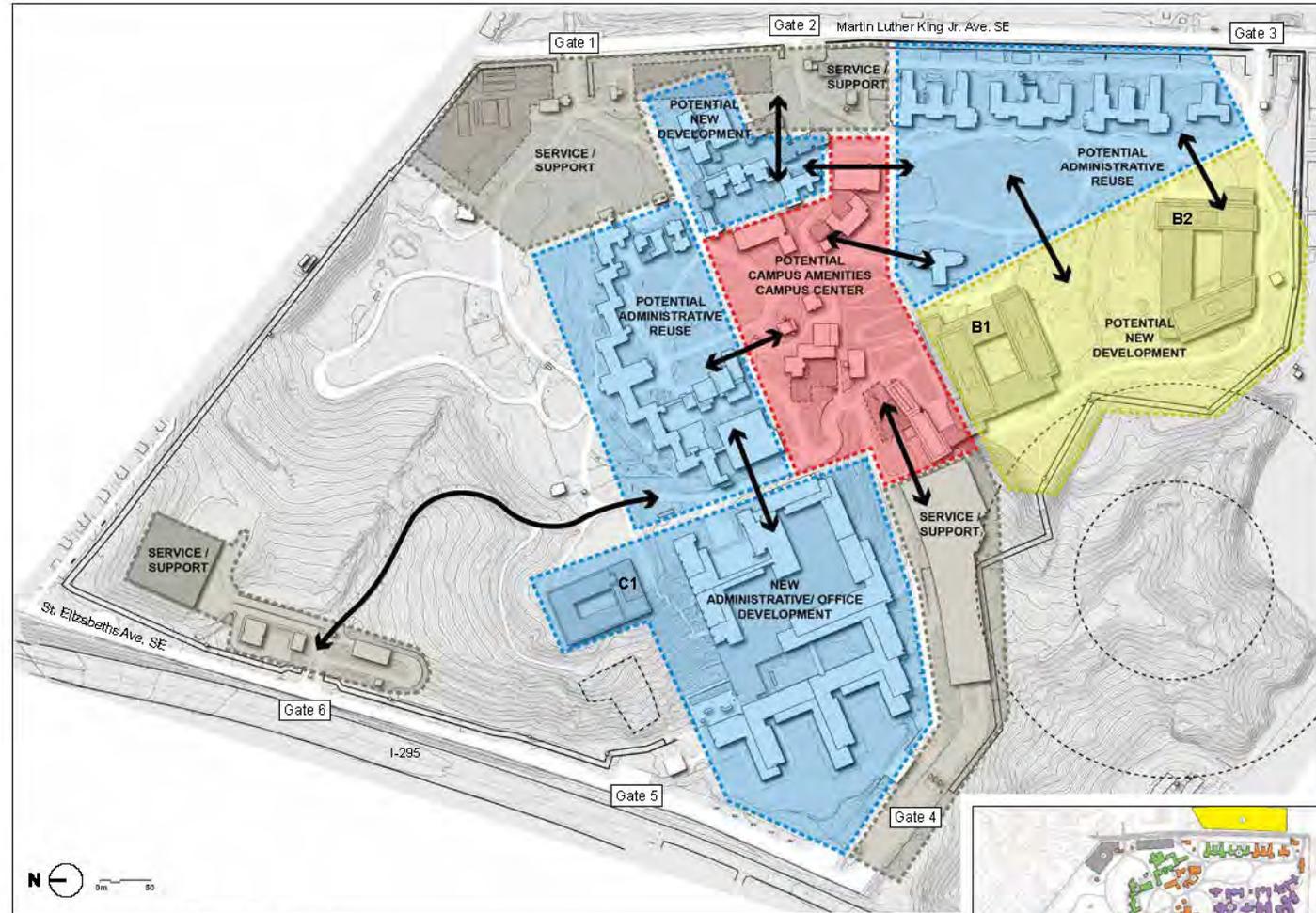


Figure 6.18 - Amendment 2 Planning Relationships

Image at lower right: Figure 6.20 - Building Use by Functional Division from the 2008 Master Plan



### LEGEND

- New development
- Administrative / office
- Shared facilities
- Service and support

# Development Density

## Development Density

While the site and building development have evolved on and around the West Campus, this site development plan element remains largely consistent with the intent of the 2008 Master Plan.

Consistent with the Planning Principle to locate new development density to respect the character of and relationships between the historic resources, perimeter areas of the site are developed to a higher density with new buildings housing state-of-the-art office space. The new buildings will contain agency administrative offices and related spaces. Existing buildings will contain administrative space as well as shared uses such as a campus cafeteria and meeting facilities.

The density descriptions are consistent with the Planning Principles and based on the definitions in the DC Comprehensive Plan District Elements.

**Medium Density** development is located on the Plateau site, along the west edge of the campus, south of the central Ravine.

**Moderate Density** development is located west of Gate 2, in close proximity to the central assembly of historic buildings and landscapes, to the south of the Center Building, and on the western slopes west of the Center Building.

**Low Density** development is located in the lower elevations of the site adjacent to the I-295 right-of-way.



Figure 6.19 - Amendment 2 Development Density  
Image at lower right: Figure 6.7 - Density Diagram from the 2008 Master Plan

### LEGEND

- Zone I: Medium Density
- Zone II: Moderate Density
- Zone III: Low Density

# Building Heights and Topography

## Building Heights

While the site and building development have evolved on and around the St. Elizabeths West Campus, this site development plan element remains consistent with the intent of the 2008 Master Plan.

Building heights throughout the site are limited to respect the scale of the historic buildings. No new buildings will be higher than the Center Building tower (251 feet) in order to respect the prominence of that building. In the historic core of campus, buildings will be no taller than three floors above existing grade in order to be compatible with adjacent historic buildings.

The density in Amendment 2 is primarily focused around larger building footprints in the Plateau site in order to minimize new development in the historic central portion of the campus. On the western edge of the Plateau site, the buildings will be no taller than seven floors, consistent with the 2008 Master Plan. The Sweetgum Lane site development is scaled in height to be deferential to the Munro Building.

See the site and building sections on the following pages depicting the relative building heights described above.

### LEGEND

0'-15'	70'-75'	130'-135'
15'-20'	75'-80'	135'-140'
20'-25'	80'-85'	140'-145'
25'-30'	85'-90'	145'-150'
30'-35'	90'-95'	150'-155'
35'-40'	95'-100'	155'-160'
40'-45'	100'-105'	160'-165'
45'-50'	105'-110'	165'-170'
50'-55'	110'-115'	
55'-60'	115'-120'	
60'-65'	120'-125'	
65'-70'	125'-130'	



Figure 6.20 - Amendment 2 Building Heights

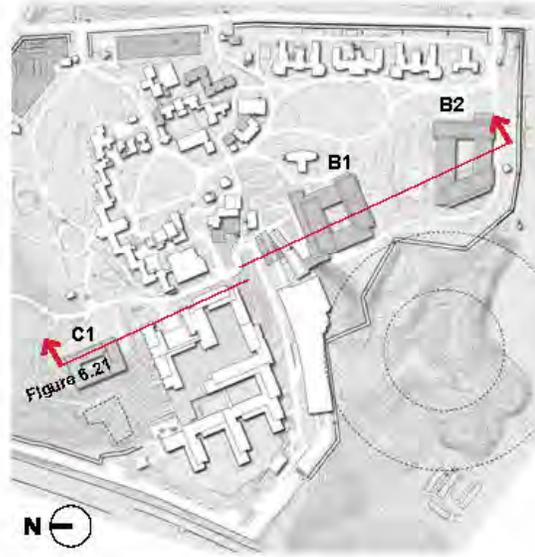
Image at lower right: Figure 6.8 - Site and Building Elevation from the 2008 Master Plan



# North-South Site Section

### North-South Site and Building Section

Updated since the 2008 Master Plan, this north-south section through the West Campus illustrates the buildings concentrated in the Plateau site. The buildings facing the South Lawn respect the prominence of the Center Building as the main structure and focal point, while the Ravine becomes an accessible landscape feature to connect the Campus.



Section key map

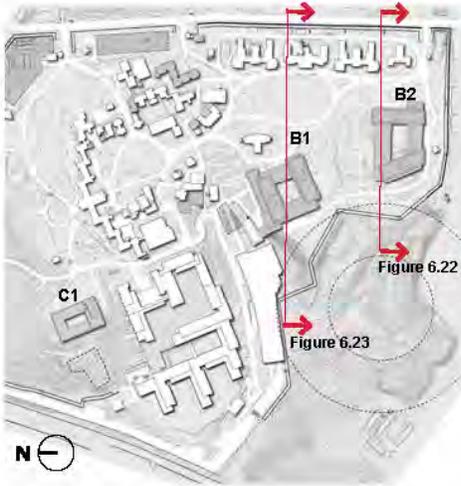


Figure 6.21 - North-South section facing west through the campus. Section Key above.

# East-West Site Sections

### Site and Building Sections through Plateau Site

Updated since the 2008 Master Plan, the East-West sections through the South Lawn and the proposed buildings in the Site show that the buildings create a larger setback from the existing buildings along the South Lawn. The sections through the proposed buildings illustrate that intended stepping along the west portion of the site, with the maximum seven-floor structures above the existing grade.



Section Key Map

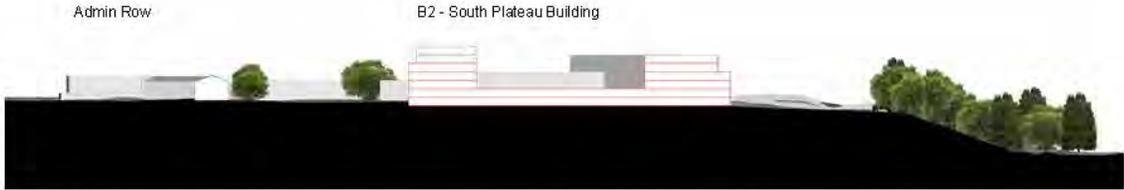


Figure 6.22 - East-West section facing south through Administration Buildings and B2 - Plateau South Building site. Section Key above.



Figure 6.23 - East-West section facing south through Admin Buildings and Plateau North Building site. Section Key above.

# Landscape Concept

## Landscape

While the site and building development have evolved on and around the St. Elizabeths West Campus, this site development plan element remains largely consistent with the intent of the 2008 Master Plan.

Guided by the St. Elizabeths Hospital West Campus Cultural Landscape Report (CLR, 2007) and the Planning Principles, the landscape plan honors 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. The significant open space north of the Center Building, including The Point, remains free of construction. New construction is located to the west of the Center Building and south of the Power House ravine, with some minor buildings and additions at other points on the campus.

The plan proposes to integrate the historic landscape and natural features into the campus design, to the maximum extent practicable. Historic landscape patterns will link the various areas of the campus, enhancing views within the site.

- LEGEND
- Plateau Extents
  - Existing Historically Significant Trees
  - Proposed Trees
  - Arboretum
  - Woodlands
  - Main Outdoor Rooms
  - Courtyards
  - Transition Landscapes
  - Perimeter Landscape
  - Landscapes Over Structures



Figure 6.24 - Amendment 2 Landscape  
 Image at lower right: Figure 6.21 - Landscape from the 2008 Master Plan



# Topographic Bowl and Regional Views

## Regional Views

Since reciprocating views and vistas are an integral and defining component of the campus as a National Historic Landmark, it is necessary to visualize how proposed development will impact views of the West Campus, in accordance with the Planning Principles, Amendment 2 works to preserve existing views and protect the visual quality of the West Campus.

### Regional View A: view from Arlington House (4.3 miles)

From one of the highest points at Arlington National Cemetery, this view shows the proposed buildings in the historic core of the West Campus, the Center Building tower, the Munro Building on the western slopes, and the Power House stacks.

### Regional View B: view from Hains Point (1.3 miles)

The predominant features from this vantage point are the buildings on Naval Support Facility Anacostia. The St. Elizabeths Power House stacks and Center Building tower are visible just above the tree line. The proposed buildings in the historic core of the West Campus will be visible to the left of the Center Building tower, and the Munro Building on the western slopes is visible right below the Power House stacks, their heights stepping down with the site topography.

### Regional View C: view from South Capitol Street Bridge (1.3 miles)

From this view, the St. Elizabeths Center Building tower and Power House stacks can be seen above the tree line. The proposed buildings in the historic core of the West Campus will be visible to the left of the Center Building tower and the proposed buildings on the Pavilion site would be slightly visible from this location, still lower than the Center Building tower. This view is important because, of the five regional views selected, it is the closest to the site.

### Regional View D: view from Washington Navy Yard (1.3 miles)

### Regional View E: view from Marina at GW Parkway View Location (2.5 miles)



Figure 6.26 - Regional Views Key Map

# Regional View – Arlington House

**Regional View A:** view from Arlington House

From one of the highest points at Arlington National Cemetery, this view shows the proposed buildings in the historic core of the West Campus, the Center Building tower, the Munro Building on the western slopes, and the Power House stacks.



**Figure 6.27** - View Key  
Source of figures: 2008 Master Plan



**Figure 6.28** - Regional View A.  
Source of base image underlay: 2008 Master Plan

# Regional View – Hains Point

**Regional View B:** View from Hains Point

The predominant features from this vantage point are the buildings on Naval Support Facility Anacostia. The St. Elizabeths Power House stacks and Center Building tower are visible just above the tree line. The Munro Building on the western slopes is visible right below the Power House stacks, and the new Plateau development will be visible to the south of the smoke stacks.

**Regional View C:** View from South Capitol Street Bridge

From this view, the St. Elizabeths Center Building tower and Power House stacks can be seen above the tree line. The proposed buildings in the historic core of the West Campus will be visible to the left of the Center Building tower and the proposed buildings on the Plateau site would be slightly visible from this location, still lower than the Center Building tower. This view is important because, of the five regional views selected, it is the closest to the site.

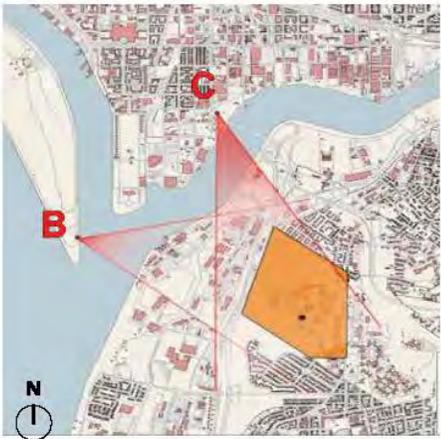


Figure 6.29 - Regional Views Key Map  
Source of figures: 2008 Master Plan



Figure 6.30 - Regional View B - View from Hains Point



Figure 6.31 - Regional View C - View from South Capitol Street Bridge  
Source of base image for overlay: 2008 Master Plan

# Regional View – Washington Sailing Marina

**Regional View D:** view from the Washington Navy Yard

View not included. Only the Power House stacks of the West Campus are visible from the Washington Navy Yard location. The topography of the Anacostia Hills conceals other existing buildings on the campus. Much of this view would not change after the build-out of the Master Plan. The forest along this ridge-line will remain intact and obscure views of proposed buildings.

**Regional View E:** view from Washington Sailing Marina along GW Parkway

In this photograph, the Center Building tower and the Power House stacks are barely visible to the unaided eye. The rest of the campus buildings are hidden behind the tree line by the Anacostia Hills. Most proposed buildings on the western slopes are located behind trees, with only the rooftops of some of the plateau buildings visible to the right of the Power House stacks.



Figure 6.32 - Regional view key map

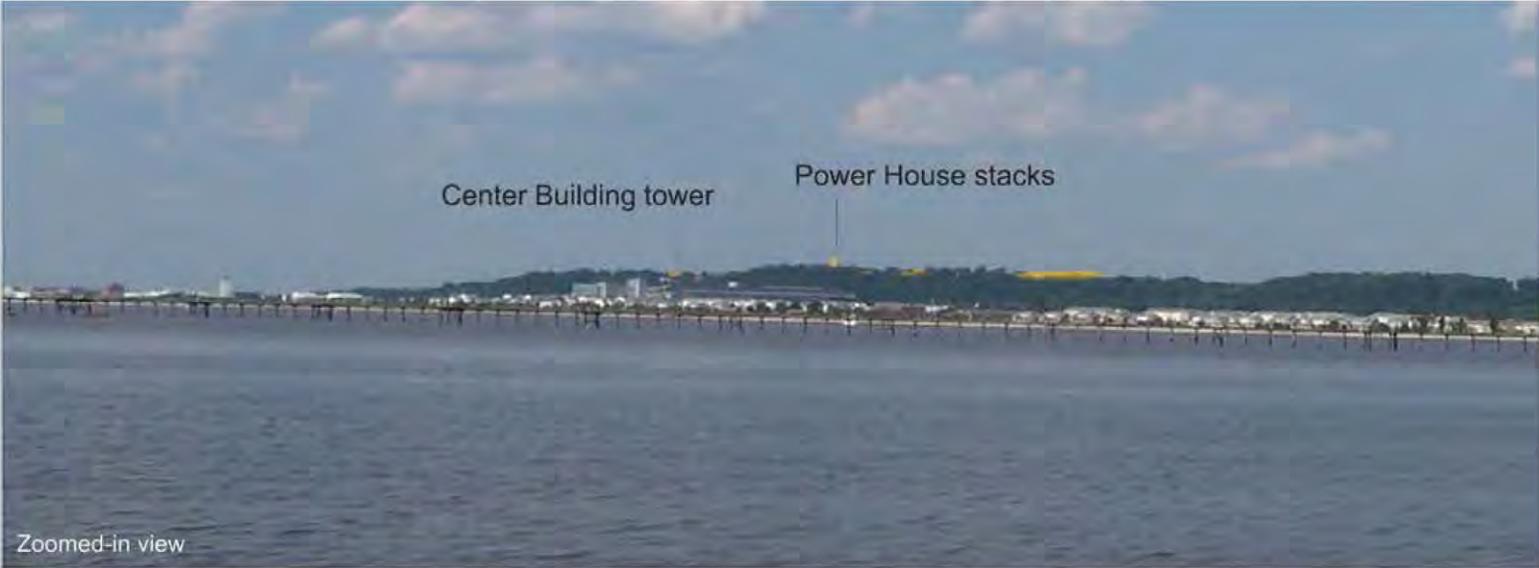


Figure 6.33 - Regional view 'E' from Washington Sailing Marina

Source of base image for overlay: 2008 Master Plan

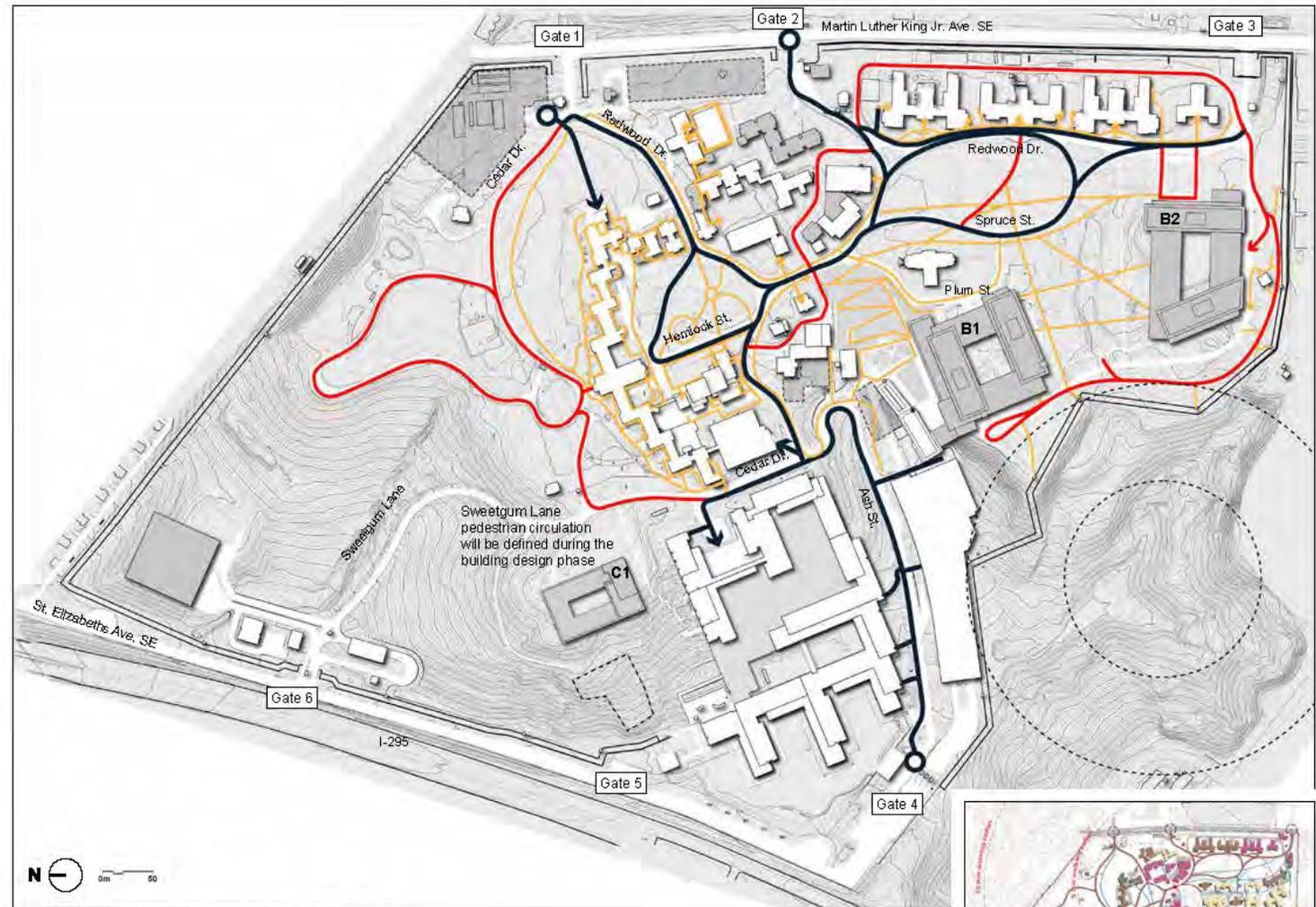
# Pedestrian Access and Circulation

## Pedestrian Access and Circulation

While the site and building development have evolved on and around the St. Elizabeths West Campus, this site development plan element remains largely consistent with the intent of the 2008 Master Plan.

The West Campus is a pedestrian-oriented campus. The pedestrian circulation patterns established by the existing campus organization are strengthened with the addition of development and a population of employees and visitors. The placement of parking at the perimeter and the restriction of vehicular circulation to internal shuttles and vehicles with special permission support the pedestrian nature of the campus.

Proposed buildings will be located within a 5- to 10-minute walk from the center of the West Campus and will facilitate efficient pedestrian movement throughout the campus. Consistent with the Planning Principles, Amendment 2 builds upon the existing historic paths to reinforce spatial continuity and create a pedestrian-friendly environment inside the campus.



**Figure 6.43** - Amendment 2 Pedestrian Access and Circulation  
Image at lower right: Figure 6.42 - Pedestrian Circulation from the 2008 Master Plan

### LEGEND

-  Gate Access
-  Primary Pedestrian Circulation
-  Secondary Pedestrian Circulation
-  Main Outdoor Rooms

# Phasing Diagram

### Phasing

Amendment 2 defines the phasing for new construction on the West Campus, on the plateau and Sweetgum Lane sites. It is anticipated that the Ravine Building (B1) will be built first, followed by the Sweetgum Lane and South Building (B2). Parking, included in the 2008 Master Plan, will be built concurrently with the development of the Sweetgum Lane site and/or B2.

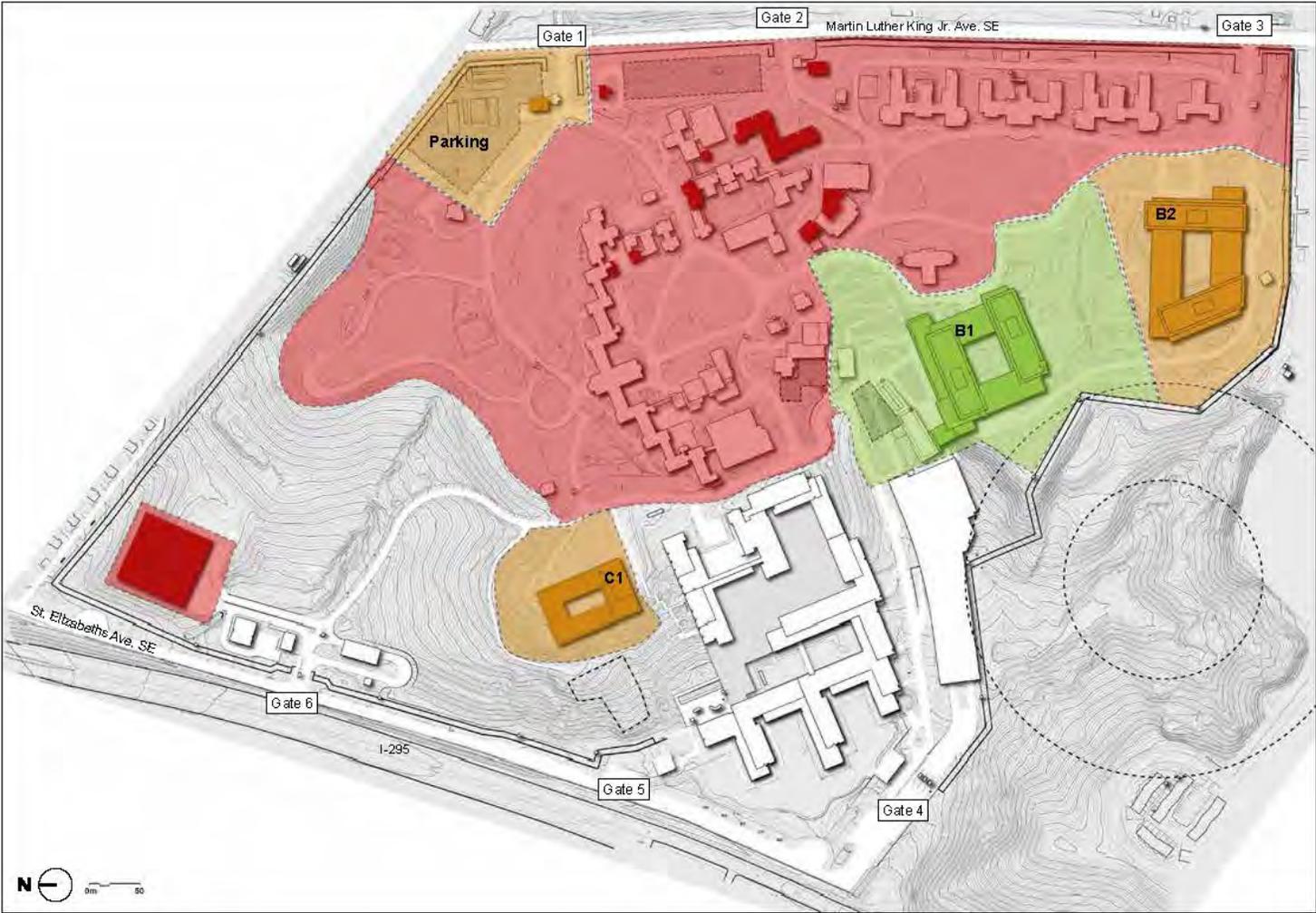


Figure 6.44 - Amendment 2 Phasing

### LEGEND

- Amendment 2 First Phase
- Amendment 2 Second Phase
- Development on remainder of West Campus

# Master Plan Rendering



**MASTER PLAN AMENDMENT 2 FOR THE  
DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION**

General Services Administration  
St. Elizabeths West Campus  
Washington, DC

October 1, 2020

Record of Decision

**Statement of Decision**

In consultation with the Commission, as Chairman of the National Capital Planning Commission (NCPC or Commission) it is my decision to approve this Record of Decision (ROD) and thereby implement the Preferred Alternative – Alternative B as presented and analyzed in the Draft and Final Master Plan Amendment 2 EISs. This action is necessary as part of the redevelopment of the St. Elizabeths West Campus associated with the DHS Headquarters consolidation. This ROD allows implementation of all development outlined in the 2020 Master Plan Amendment 2 to proceed subject to Commission review of individual projects. A copy of the FEIS is included in Appendix A of this ROD.

The Preferred Alternative includes development on St. Elizabeths West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, to support the DHS Headquarters consolidation as described in this ROD. GSA will continue to support DHS in reducing its numerous and disparate leases across the NCR to consolidate all DHS activities on the St. Elizabeths West Campus.

All practicable means of avoiding or minimizing environmental harm and harm to historic resources from the Preferred Alternative will be adopted by GSA, and NCPC shall consult with GSA periodically during implementation of specific projects to ensure compliance.

**Project Background**

In 2004, the General Services Administration (GSA) obtained control of the St. Elizabeths West Campus in Southeast, Washington, DC, in anticipation of meeting a portion of the need for secure Federal office space in the National Capital Region (NCR). On June 7, 2005, in compliance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's (CEQ) implementing regulations, GSA published a Notice of Intent (NOI) to prepare an EIS for the proposed redevelopment of the St. Elizabeths West Campus. On June 28, 2007, GSA published a revised NOI. The NOIs defined the purpose of the proposed action as “developing secure office space in the District of Columbia to accommodate substantial Federal operations,” specifically the Consolidated Headquarters of the Department of Homeland Security (DHS) and its components,

in accordance with the 2006 *DHS National Capital Region Housing Plan* and the 2007 *Consolidated Headquarters Collocation Plan*.

GSA issued a ROD for the 2008 Final Master Plan EIS on December 16, 2008, selecting the alternative that consolidated 4.5 million gross square feet of secure office and shared-use space and associated parking on both the West and East Campuses at St. Elizabeths. As part of the 2008 Final Master Plan EIS for this action, GSA also assessed, on a programmatic level, the impacts of constructing 750,000 gross square feet of office space and associated parking on the St. Elizabeths East Campus. GSA noted in its ROD that an EIS tiered to the 2008 Final Master Plan EIS would be prepared for the East Campus.

On September 15, 2009, GSA published an NOI to prepare an EIS to address the amended 2008 *Department of Homeland Security Headquarters Consolidation Master Plan*. The NOI stated the primary purpose of the action was “to complete the consolidation of DHS mission functions comprising the Department’s Headquarters offices at St. Elizabeths for a total of 4.5 million gross square feet of secure office and shared-use space plus associated parking” on the East Campus. The 2012 Final Master Plan Amendment EIS was made public on March 2, 2012, and GSA issued a ROD for the 2012 EIS on May 17, 2012. The 2012 Final Master Plan Amendment EIS was tiered from the 2008 Final Master Plan EIS.

On November 19, 2018, GSA published an NOI to prepare an EIS for St. Elizabeths Master Plan Amendment 2, which eliminates development on the East Campus and re-evaluates development on the St. Elizabeths West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, for the DHS Headquarters consolidation. The Master Plan Amendment 2 Final EIS was issued for a 30-day public review on August 28, 2020.

### **National Capital Planning Commission Review**

Pursuant to 40 U.S.C. 8722(b)(1), NCPC reviews and comments on master plans for federal properties with more than one building on the property/installation. The final master plan serves as a basis for subsequent review and approval of individual projects envisioned in the master plan for District installations pursuant to 40 U.S.C. 8722(b)(1) and (d). NCPC’s review and approval of individual projects under the master plan constitutes a major federal action significantly affecting the quality of the human environment. This means NCPC must comply with NEPA, CEQ Regulations Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508) (1978 version); and NCPC’s NEPA regulations (1 CFR § 601). Pursuant to NCPC’s NEPA Regulations, applicants, with NCPC’s participation as a cooperating agency, typically undertake their NEPA obligation at the time of their master plan development and submit their NEPA documentation to NCPC for the Commission’s review and approval as part of the master plan application. NCPC’s approval of the EIS and issuance of a ROD at the time of master plan review renders it possible for applicants to utilize the NEPA document to meet their NEPA obligation for specific projects included in the master plan and submitted to the Commission for review and approval at a later date.

NCPC approved the initial Master Plan for the consolidation of DHS Headquarters on the West and East Campuses on January 8, 2009. It approved the Master Plan Amendment 1 on June 7,

2012. The draft Master Plan Amendment 2 was reviewed by NCPC on July 9, 2020, and the Final Master Plan Amendment 2 was approved at the Commission's October meeting. At the time of its review, the Commission approved and adopted this ROD

### **Purpose and Need of the Proposed Action**

The purpose for this proposed action is to support the continued consolidation of the DHS Headquarters offices on the St. Elizabeths West Campus. The proposed Master Plan Amendment 2 eliminates development on the East Campus and re-evaluates development on the West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, on the West Campus only. The proposed action is needed for efficiency, to reflect the current condition of the historic buildings, to reduce costs, and to accelerate completion of the DHS consolidation.

### **Rationale for Decision**

This ROD documents the specific components of and reasons for NCPC's decision. This decision is based on analyses contained in the Draft Environmental Impact Statement (EIS) issued May 2020; the Final EIS issued in August 2020; the comments of NCPC, other Federal, State, and local agencies, members of the public, and other information in the administrative record. The decision to choose the Preferred Alternative -- Alternative B as the basis for NCPC's review and approval of future projects involved balancing GSA goals, resource concerns and public interests. NCPC reached its decision after careful consideration of the environmental analysis of the effects of the Action Alternatives and the No-Action Alternative in concert with the needs of GSA and DHS.

The Preferred Alternative -- Alternative B best meets the purpose and need, while balancing potential impacts. The alternative balances the likely adverse impacts on the National Historic Landmark (NHL), with the pressing national security need for DHS to consolidate its headquarters at a single, secure site in the National Capital Region (NCR). This decision takes into account resource concerns and mitigation measures to address these concerns, DHS' national security mission and program, and public interests as described in the NEPA documentation.

The master plan is a guide for project implementation over the next 20-30 years. Specific designs for each project will be further assessed when they are developed in detail. Individual projects will also require review and approval by the Commission and follow-on Section 106 consultation with consulting parties.

### **Preferred Alternative Description**

Under Alternative B, 1.2 million gross square feet of office space will be provided in two separate office structures (proposed Buildings B1 and B2) organized around two enclosed courtyards on the plateau site. Building heights will be designed to reach between three and eight stories. The largest part of the structures will have an east-west orientation to optimize the use of daylight and energy efficiency. The building organization also relates well to the east to west direction of stormwater flow.

The courtyards will be secured to provide open space for building occupants. Buildings could be linked below grade at these elevation drops to facilitate internal circulation. The buildings will fit

naturally on the site minimizing the need to disturb existing topography and vegetation on the plateau site. Building B1 will be stepped down into the ravine near Building 56/57 to stabilize the slope in that area. Building 56/57 will be integrated into the design of Building B1. Buildings 52 and 64 will be retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, and 68, which total 70,277 gross square feet, will be demolished under Alternative B. Building 69, which is 27,588 gross square feet, will be evaluated by GSA to determine if it can be feasibly retained and used as Federal office space. GSA will report findings to the Section 106 consulting parties and consider their comments on the findings. Approximately eight acres of the plateau site will be disturbed as a result of demolition and construction activities under Alternative B.

Under Alternative B, 175,000 gross square feet of office space will be constructed on the Sweetgum Lane site (proposed Building C1) in the same manner as Alternative A (described below). Building 15, which totals 2,749 gross square feet, will be demolished under Alternative B. Approximately 1.5 acres of the Sweetgum Lane site will be disturbed as a result of demolition and construction activities under Alternative B.

Under Alternative B, an additional 1,014 employee parking spaces will be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces will be added to the previously proposed underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

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

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

Alternative B was chosen as the Selected Alternative because it best meets the purpose and need, while best balancing the likely adverse impacts on the National Historic Landmark (NHL), with the pressing national security need for DHS to consolidate its headquarters at a single secure site in the NCR.

## Other Alternatives Considered

### *No Action Alternative*

Under the No Action Alternative, GSA would develop the St. Elizabeths West Campus as described in the Master Plan as approved by the National Capital Planning Commission (NCPC) on January 8, 2009. The development would provide 1,141,133 gross square feet of office and related space on the plateau site, with no development on the Sweetgum Lane site, resulting in a total of 3.8 million gross square feet of office and related space on the West Campus. This development would disturb approximately 6 acres on the plateau site. Parking would be provided at a ratio of one parking space for every four employees (1:4). On the West Campus, 1.2 million gross square feet of parking would be constructed above and below grade. No buildings would be demolished within the plateau or Sweetgum Lane sites under the No Action Alternative.

Master Plan Amendment 1, which was approved by NCPC in June 2012, included the development of office space and parking on the North Parcel of the East Campus. The East Campus is under the control of the District of Columbia; therefore, the construction of DHS facilities on the East Campus is not feasible and was not included under the No Action Alternative.

### *Alternative A*

Under Alternative A, 1.2 million gross square feet of office space would be organized into three separate office structures (proposed Buildings A1, A2, and A3) organized around two open courtyards on the plateau site, resulting in a campus setting that correlates to the organization of the historic buildings on the St. Elizabeths West Campus. Building heights would likely be designed to reach between three and eight stories. The largest part of the structures would generally have an east-west orientation, which would be ideal for optimizing the use of daylight and energy efficiency. The building organization also relates well to the east to west direction of stormwater flow. The central open courtyards would be tiered from east to west, in conjunction with site topography. Buildings could be linked below grade at these elevation drops to facilitate internal circulation, fit naturally on the site, and minimize the need to disturb existing topography and vegetation. Building A1 would be stepped down into the ravine near the Building 56/57 to stabilize the slope in that area. Building 56/57 would be integrated into the design of Building A1. Buildings 52 and 64 would be retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, 68, and 69, which total 97,865 gross square feet, would be demolished under Alternative A. Approximately 7 acres of the plateau site would be disturbed as a result of demolition and construction activities under Alternative A.

Under Alternative A, 175,000 gross square feet of office space (proposed Building C1) would be constructed on the Sweetgum Lane site, organized into primarily below-grade construction, with one two-story building constructed to mirror the northwest corner of the Munro Building. The building would include up to three below-grade levels, which would take advantage of the site slope from east to west, allowing the western edge of the building to receive daylight. A central courtyard would provide internal daylighting; the building could be linked below grade to the DHS Operations Centers. Building 15, which totals 2,749 gross square feet, would be demolished under Alternative A. Approximately 1.5 acres of the Sweetgum Lane site would be disturbed as a result of demolition and construction activities under Alternative A.

Under Alternative A, an additional 1,014 employee parking spaces would be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces would be added to the previously proposed underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

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

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

### **Alternatives Dismissed from Further Analysis in the EIS**

During the process of defining viable alternatives, several sites on the St. Elizabeths West Campus were investigated for new development that were subsequently dismissed from further detailed analysis. Descriptions of the dismissed alternatives and the rationale for dismissal are provided in Section 2.5 of the Master Plan Amendment 2 Final EIS.

### **Environmentally Preferred Alternative**

Section 1505.2 The CEQ Regulations requires federal agencies to " identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable." The environmentally preferable alternative(s) have been outlined by resource area to reflect the balanced approach necessary when evaluating a long-term master plan. Table (1), below, identifies the resource and relevant alternative.

**Table 1. Environmentally Preferred Alternative Analysis**

Issue	No Action Alternative	Alternative A	Alternative B
Natural Resources	X		
Cultural Resources	X		
Social and Economic Resources	X	X	X
Air Quality	X	X	X
Noise	X	X	X
Transportation	X	X	X
Utilities	X	X	X
Environmental Contamination	X	X	X

As noted above, the impacts to varying resource types were balanced against the project's purpose and need, the No Action Alternative is the environmentally preferable alternative for natural and cultural resources. The No Action Alternative would result in less ground disturbance and impact fewer trees than Alternatives A and B. The No Action Alternative would also retain more historic resources than Alternatives A and B. However, under Alternative B, proposed buildings located farther from the ravine; adverse impact is lessened when compared to Alternative A. Alternatives A, B, and the No Action Alternative, are the environmentally preferable alternatives for social and economic resources, air quality, noise, transportation, utilities, and environmental contamination because impacts are similar among the alternatives.

### **Public Involvement**

Numerous Federal and local agencies and community groups, stakeholders, and members of the public were consulted throughout scoping, Draft EIS and Final EIS process. The intent of the consultation was to provide information on the project, solicit information on issues that could affect the outcome of the project, and seek input on alternatives and potential impacts. Further, in addition to NCPC, DHS and the District of Columbia Department of Transportation (DDOT) were designated as cooperating agencies for the preparation of the Master Plan Amendment 2 EIS, and their input has been incorporated into the documentation.

GSA published an NOI to prepare the Master Plan Amendment 2 EIS in the Federal Register on November 19, 2018. The NOI was also published on November 19, 2018, in *The Washington Post*, *The Informer*, and *The Afro-American*. From November 19, 2018, through December 19, 2018, the public was given an opportunity to participate in the scoping process for Master Plan Amendment 2. During the scoping process for Master Plan Amendment 2, a public meeting was held on November 29, 2018, on the St. Elizabeths East Campus, during which comments and concerns were officially documented. The scoping period and meeting were announced in the newspapers with the NOI and were also announced on the project website.

A Notice of Availability (NOA) for the Draft EIS was published in the Federal Register on May 8, 2020. A notification letter of the Draft EIS availability was sent to 308 potentially interested parties, including Federal, state, and local agencies having jurisdiction by law or subject matter expertise, and to any person, organization, stakeholder group, or agency that had expressed interest in reviewing the Draft EIS during the scoping process. A 55-day comment period for the Draft EIS was initially provided from May 8, 2020, to July 2, 2020. Notices of the Draft EIS availability and comment period were published on May 8, 2020, in *The Washington Post*, May 9, 2020, in *The Afro-American*, and in the May 2020 edition of *East of the River Magazine*. Availability of the Draft EIS was also announced on the project website. The public and agencies were encouraged to submit written comments on the Draft EIS by mail or email.

Due to the requirements for social distancing related to COVID-19, GSA made alternate arrangements in lieu of a traditional public hearing on the Draft EIS. On June 30, 2020, GSA notified the public and agencies by letter and/or email of the availability of a pre-recorded presentation online or by phone from July 1, 2020, through July 16, 2020. The phone line established for the project presentation included an option to record a message with comments on the Draft EIS. An amended notice was also published in the Federal Register on July 2, 2020, extending the comment period to July 16, 2020. The June 30, 2020, notification also informed the public and agencies of the comment period extension. In total, five comment letters were received during the Draft EIS public review period. All comments on the Draft EIS were considered during the preparation of the Final EIS.

A Notice of Availability (NOA) for the Final EIS was published in the Federal Register on August 28, 2020. A notification letter of the Final EIS availability was sent to 292 potentially interested parties, including Federal, state, and local agencies having jurisdiction by law or subject matter expertise, and to any person, organization, stakeholder group, or agency that had expressed interest in reviewing the Final EIS. A 30-day review period for the Final EIS was provided from August 28, 2020, to September 28, 2020. Notices of the Final EIS availability and review period were published on August 28, 2020, in *The Washington Post*, August 29, 2020, in *The Afro-American*, and in the September 2020 edition of *East of the River Magazine*. Availability of the Final EIS was also announced on the project website.

Throughout the project, GSA sought input from Federal and local agencies and stakeholders, as well as Consulting Parties, regarding the proposed action and ways to avoid or minimize adverse impacts. Since September 2005, GSA has been regularly meeting with agencies and stakeholders associated with St. Elizabeths that might be affected by the redevelopment, including the Advisory Council on Historic Preservation (ACHP), Advisory Neighborhood Commission 8C, Committee of 100 on the Federal City, Cultural Landscape Foundation, DC Preservation League, DC Office of Planning, DC State Historic Preservation Office (DCSHPO), Federal Highway Administration (FHWA), Joint Base Anacostia-Bolling, NCPC, National Association of Olmsted Parks, National Park Service, National Trust for Historic Preservation, St. Elizabeths Hospital, U.S. Commission of Fine Arts, DDOT, and DHS. In addition, GSA has sought consultation with the Delaware Nation, a federally recognized American Indian tribe.

## **Section 106 of the National Historic Preservation Act**

In compliance with the National Historic Preservation Act (NHPA), GSA sought input from Consulting Parties on the impacts to the historic resources from the Master Plan Amendment 2 and ways to avoid and minimize potential adverse effects. Previously, a Programmatic Agreement (PA) for the DHS Headquarters consolidation was executed in December 2008 between GSA, DHS, ACHP, DCSHPO, NCPC, and FHWA. Thereafter and to date, GSA has executed seven MOAs for development projects on the West Campus.

As part of the Master Plan Amendment 2, a new MOA was executed in September 2020. The MOA for Master Plan Amendment 2 is included as Appendix 2 of this ROD.

In the MOA, GSA has agreed to take the following specific actions to mitigate adverse effects associated with this Second Amendment:

- Conduct additional documentation, including digital documentation of the interiors and exteriors of Buildings 60, 66, 68, and 69 and make it available to the public through an online platform.
- Provide tags with botanical information on historic trees as defined in the Landscape Preservation Plan within 5 years of the execution of this MOA, and replace historic trees removed for construction with the same or similar species in a nearby location as feasible and subject to guidance from GSA's Regional Horticulturalist and in consultation with the DC SHPO.
- Create an online version of materials from the 2017-2018 St. Elizabeths exhibit at the National Building Museum, and add the interpretive sign program, and other educational materials and documentation, within 5 years of execution of this MOA and in consultation with the DCSHPO.

In addition, GSA will continue to follow the Section 106 Consultation Process and Procedures for Design Submissions and consult with the Signatories and Consulting Parties for each project envisioned by the Master Plan Amendment 2. The Section 106 MOA acknowledges that the projects may advance individually.

Further, GSA will evaluate Building 69 to determine if it can be feasibly retained and used as federal government office space, will report its findings to the Consulting Parties in writing, and will consider the Parties comments on the findings. Should GSA's evaluation conclude that it can be feasibly retained and used by the federal government, this MOA will remain in force, if GSA determines it necessary, a revised master plan amendment, , will be the subject of further consultation. Should GSA's evaluation conclude that Building 69 cannot be feasibly retained and used by the federal government, GSA will notify the Consulting Parties of this decision in writing.

## EIS Mitigations Measures

Potential mitigation measures were identified and recommended by GSA in the Final EIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the Selected Alternative, mitigation measures are described below. GSA is committed to implementing these implementation measures, and NCPC shall consult with GSA periodically during implementation of specific projects to ensure compliance.

### *Cultural Resources*

- Mitigation measures are identified in the 2008 PA for the redevelopment of St. Elizabeths to address potential adverse effects on the St. Elizabeths Hospital NHL and in subsequent MOAs in compliance with Section 106 of the NHPA. Mitigation measures for cultural resources affected by Master Plan Amendment 2 are detailed in the MOA for the Master Plan Amendment 2 executed in September 2020 (Appendix B) and summarized in the preceding section of this ROD.

### *Geology, Topography, and Soils*

- Erosion and sediment controls will be employed during demolition and construction where ground-disturbing activities occur. These controls will minimize impacts to surface water from sedimentation and other pollutants by containing erodible materials within the limits of construction. GSA will employ more than one containment method, including, but not limited to, silt fencing, dewatering filter bags, diversion channels or berms, temporary stormwater basins or sediment traps, temporary inlet protection, stabilized construction entrances, and vegetation stabilization.
- Buildings will be structurally engineered to mitigate the presence of Potomac Group deposits with the potential for shrinking or swelling.
- Prior to construction, GSA will obtain all necessary permits and comply with the requirements and guidelines set forth in those permits to minimize adverse impacts. Erosion and sediment control plans will be developed in accordance with the DC Department of Energy and Environment (DOEE) requirements and will be submitted to DOEE for approval. Construction contractors will be required to implement and maintain these erosion and sediment control measures until construction is complete and vegetation has been established.
- GSA will contract with an independent environmental monitor (IEM), separate from the construction contractor, to verify that construction complies with all terms and conditions of the permits and approvals. The IEM will inspect erosion and sediment control devices to ensure they are being sufficiently maintained and are effective, in addition to other identified responsibilities. The IEM will report deficiencies to the contractor, GSA, and regulatory agencies, if required, and support efforts to resolve issues in a timely manner. GSA will hold the construction contractor responsible for maintaining compliance and for expeditiously responding to deficiencies identified by the IEM.

- When construction is complete, exposed soils will be stabilized with landscaping to minimize potential future soil erosion. Following construction, GSA will continue to monitor and maintain the efficacy of erosion and sediment control devices and stormwater management facilities.
- Slope stabilization measures, such as closely spaced drilled piers, will be utilized for construction on steep slopes to mitigate possible future slope failure. During the building design process, GSA will also consider the use of retaining walls to stabilize slopes.

#### *Groundwater*

- During the building design process, GSA will consider the use of infiltration devices to mitigate the increase in impervious area. Infiltration devices capture stormwater before it flows into storm sewers or streams and allow it to soak into the ground.
- Several of the proposed buildings will be partially below ground. The underground portions of these buildings could reach a zone of perched groundwater, leading to the potential intrusion of groundwater into the buildings. As part of the building design process, geotechnical engineering will be undertaken as mitigation to verify stormwater and groundwater conditions on the building site, and buildings will be designed and constructed to mitigate potential groundwater intrusion.

#### *Surface Water*

- Erosion and sediment controls will be employed during demolition and construction to minimize indirect impacts to surface water from sedimentation and other pollutants by containing erodible materials within the limits of construction. GSA will employ more than one containment method that may include silt fencing, dewatering filter bags, diversion channels or berms, temporary stormwater basins or sediment traps, temporary inlet protection, stabilized construction entrances, or vegetation stabilization.
- Prior to construction, GSA will obtain all necessary permits and comply with the requirements and guidelines set forth in those permits to minimize adverse impacts. Stormwater management plans will be prepared in accordance with the St. Elizabeths Utility Integration Plan Overall Stormwater Program and approved by DOEE prior to implementation. National Pollutant Discharge Elimination System (NPDES) permit coverage for stormwater discharges under the EPA Construction General Permit will also be obtained. Erosion and sediment control plans will be developed in accordance with the DOEE requirements and also submitted to DOEE for approval. Construction contractors will be required to implement and maintain these erosion and sediment control measures until construction is complete, vegetation has been established, and permanent stormwater controls are in place. Implementation of permanent controls for stormwater quantity and quality outlined in the St. Elizabeths Utility Integration Plan Overall Stormwater Program, including stormwater retention ponds, green roofs, infiltration/bioretenion practices, and water quality inlets, will help contain sediment and other materials to minimize long-term impacts to water quality.

- GSA will contract with an IEM, separate from the construction contractor, to verify that construction complies with all terms and conditions of the permits and approvals. The IEM will inspect erosion and sediment control devices to ensure they are being sufficiently maintained and are effective, in addition to other identified responsibilities. The IEM will report deficiencies to the contractor, GSA, and regulatory agencies, if required, and support efforts to resolve issues in a timely manner. GSA will hold the construction contractor responsible for maintaining compliance and for expeditiously responding to deficiencies identified by the IEM.
- Indirect impacts to surface waters will be reduced over the long-term through the incorporation of onsite stormwater controls. During the building design process, GSA will consider incorporating green infrastructure and low impact development techniques, including bioretention facilities, permeable pavement, bioswales, bio-planters, green roof systems, subsurface structural BMPs, wet ponds, and rooftop disconnection. Following construction, GSA will continue to monitor and maintain the efficacy of erosion and sediment control devices and stormwater management facilities. Also, integrated pest management and turf maintenance practices will be used during landscaping to mitigate the long-term, indirect impacts to surface waters from pesticide and fertilizer applications used on landscaped areas.

### *Vegetation*

- Vegetation will be cleared only as necessary and parking and storage of construction vehicles and equipment will be relegated to assigned staging areas to minimize impacts. Temporary fencing will be placed around or beyond the drip line of remaining trees to protect roots from soil compaction. GSA will consider incorporating green roofs into building designs to mitigate the loss of function, such as stormwater capture and habitat, from the removal of vegetation. To mitigate impacts, native vegetation will be planted, and trees will be replaced at a 3:1 ratio to allow for plant survival rates. Trees with a diameter larger than 36-inches will be replaced at a 5:1 ratio. Replacement tree size will have a minimum diameter of 2.5-inches. Tree protection measures will be implemented with new plantings to prevent deer browse. Additionally, GSA will prevent establishment of invasive species and will institute an Integrated Pest Management Program to control the use of fertilizers, herbicides, and other chemicals used for landscaping.

### *Wildlife*

- Construction fencing will be used to minimize impacts to wildlife from construction activities. Larger wildlife species will be removed from the construction zone prior to installing fencing to prevent isolating animals within the fenced area. GSA will consider landscaping with native species and with species that provide habitat and food sources such as sumac (*Rhus* sp.), serviceberry (*Amelanchier* sp.), and elderberry (*Sambucus canadensis*) to mitigate habitat loss. During the building design process, GSA will also consider planting evergreen species to provide additional shelter for wildlife species and deer-resistant landscaping to mitigate impacts from white-tailed deer. A deer control study will identify the best methods for deer management on the West Campus. Trees to be

planted will include tree protection measures to prevent deer browse from the remaining deer populations within the West Campus.

- To minimize potential impacts to migratory birds, a pre-construction survey will be performed to determine the presence of nests within the limits of ground disturbance. If nests are identified, GSA will avoid vegetative clearing during the nesting period for those species. Trees removed for construction will be replaced to provide long-term mitigation for impacts to migratory bird habitat.

#### *Economy, Employment, and Income*

- GSA will continue to connect construction contractors working on the West Campus redevelopment with the District of Columbia Department of Employment Services and other workforce development and training organizations to assist in meeting the goals of the St. Elizabeths project's small business and hiring efforts. As with past activities on the West Campus, GSA will share the posting of employment and small business opportunities via email group and the St. Elizabeths website ([www.stelizabethsdevelopment.com](http://www.stelizabethsdevelopment.com)). GSA will continue to hold monthly virtual training and informational meetings with various community stakeholders (e.g., workforce development, Advisory Neighborhood Commissioners, District Government, DHS, U.S. Coast Guard representatives, local small businesses, and general contractors) to distribute information regarding upcoming opportunities.

#### *Air Quality*

- The regulatory requirements and best practices identified in Section 5.5.4 of the 2012 EIS to address air quality impacts remain applicable to Master Plan Amendment 2 and include the following:
  - Taking precautionary measures aimed at minimizing short-term increases in dust particulates, and equipment-related emissions during the construction
  - Certifying the absence of asbestos-containing materials for the demolition of buildings
  - Fully evaluating crushing operations for control of fugitive emissions and permitting requirements
  - Complying with anti-idling regulations in the District of Columbia

#### *Noise Mitigation*

- The regulatory requirements and best practices identified in the 2008 and 2012 EISs to address noise impacts during construction related activities and facilities operations remain applicable to Master Plan Amendment 2 and include the following:
  - All construction equipment powered by an internal combustion engine will be equipped with a properly maintained muffler
  - Air compressors will meet current EPA noise emission standards

- Newer model construction equipment will be used as much as possible since it is generally quieter than older equipment
- Nighttime construction activities will be minimized
- Portable noise barriers within the equipment area and around stationary noise sources will be established
- Tools and equipment will be selected to minimize noise
- Industrial silencers will be installed on stand-by generators

#### *Transportation Mitigation Measures*

- Given the projected degradation of operations at the Gate 1 intersection, the traffic analysis conducted as part of the Master Plan Amendment 2 considered potential roadway improvement options on Martin Luther King Jr. Avenue SE to minimize delays. Based on the results of the analysis, GSA recommends incorporating a continuous right-turn lane on Martin Luther King Jr. Avenue SE to address the delay at the Gate 1 intersection while maintaining operationally acceptable levels of service (LOS D or better) in all other traffic movements.
- Measures to mitigate impacts from construction traffic will be defined as part of the design process during each phase of construction.

#### *Electrical Service*

- Facilities will be designed to reduce energy consumption as mitigation. Energy efficiency will be promoted through GSA's goal to achieve the LEED Gold rating on new construction. GSA will incorporate energy conservation measures into building designs to reduce demand on electrical services. These measures may include building orientation, daylighting (i.e., using natural sunlight to potentially reduce energy needs for interior lighting), and installing energy-efficient lighting and heating and cooling systems.

#### *Natural Gas Service*

- Facilities will be designed to be energy and water efficient thus reducing demand on the CUP which utilizes natural gas. Energy efficiency will be promoted as mitigation through GSA's goal to achieve the LEED Gold rating on new construction.

#### *Water Service*

- Water consumption will be mitigated through GSA's goal to achieve a LEED Gold rating on new construction. GSA will consider reducing water consumption by installing native and drought-tolerant plants in landscaping that require less watering, reusing gray water for irrigation, installing water-saving faucets and toilets in bathroom and kitchen facilities, and changing custodial operations to minimize demand for potable water.

#### *Sanitary Sewer System*

- Reduced water consumption will result in an associated reduction in sanitary sewer volumes. Measures to reduce water consumption are described above. Upgrading the sanitary sewer collection system on the plateau and Sweetgum Lane sites will also provide mitigation and reduce demand by fixing damaged pipes that are allowing stormwater to infiltrate the sewer system.

#### *Solid Waste Management*

- Recycling programs will serve as mitigation and will be implemented during construction and operation of facilities at the plateau and Sweetgum Lane sites to reduce the volume of solid waste leaving the West Campus for disposal.

#### *Environmental Contamination Mitigation Measures*

- Prior to disrupting contaminated soils, areas with recognized environmental conditions will be characterized for removal and disposal by a licensed contractor in compliance with required waste characterization protocols. Prior to the commencement of demolition or renovation activities, it may be necessary to abate asbestos containing material (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCB), and mercury. GSA will ensure that all necessary abatements are properly completed in accordance with applicable laws and regulations. Development will not occur until all appropriate conditions have been met and regulator certifications or notices of closure have been obtained.
- Engineering controls, including dust suppression and worker personal protective equipment (i.e., gloves and eye protection), will be used, and a work plan will be developed and implemented, to protect the health and safety of site workers during the removal of hazardous materials and contaminated soils.

#### *Mitigation Measures Outside the Jurisdiction of GSA*

- Roadway improvements will be required along Martin Luther King Jr. Avenue SE at the Gate 1 intersection to provide acceptable current and future LOS under the Preferred Alternative. GSA will continue to coordinate with DDOT for their approval of final designs for the intersection improvements, as well as to determine appropriate funding sources for such improvements. DDOT will continue to have maintenance responsibilities of these transportation improvements.

## Conclusion

This ROD documents the specific components of my decision and the rationale for my decision to select the Preferred Alternative -- Alternative B identified in the FEIS as the basis for the Master Plan Amendment 2 for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths West Campus in Washington DC. This decision is based on information and analyses contained in the St. Elizabeths Master Plan Amendment 2 Draft EIS issued in June 2020; the Master Plan Amendment 2 Final EIS issued in August 2020 (Appendix A) which documents proposed mitigation measures; the Section 106 MOA executed in September 2020 (Appendix B) which documents mitigation measures; the comments from Federal and state agencies, stakeholder organizations, members of the public, and elected officials; and other information in the administrative record.

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Thomas M. Gallas  
Acting Chairman  
National Capital Planning Commission

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Date

### Attachments:

Appendix A: FEIS (available [here](#))

Appendix B: Section 106 Memorandum of Agreement

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3 **MEMORANDUM OF AGREEMENT AMONG**  
4 **THE UNITED STATES GENERAL SERVICES ADMINISTRATION,**  
5 **THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,**  
6 **THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICE,**  
7 **THE UNITED STATES FEDERAL HIGHWAY ADMINISTRATION,**  
8 **THE NATIONAL CAPITAL PLANNING COMMISSION,**  
9 **AND**  
10 **THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY,**  
11 **REGARDING A**  
12 **SECOND AMENDMENT TO THE MASTER PLAN FOR THE REDEVELOPMENT OF THE ST. ELIZABETHS**  
13 **WEST CAMPUS AND ASSOCIATED CONSTRUCTION**  
14 **AT ST. ELIZABETHS NATIONAL HISTORIC LANDMARK,**  
**WASHINGTON, D.C.**

15 WHEREAS, this Memorandum of Agreement (“MOA”) is made as of this \_\_\_ day of \_\_\_\_\_, 2020,  
16 by and among the United States General Services Administration (“GSA”) as lead federal agency, the  
17 Advisory Council on Historic Preservation (“ACHP”), the District of Columbia State Historic Preservation  
18 Office (“DCSHPO”), the United States Federal Highway Administration (“FHWA”), the National Capital  
19 Planning Commission (“NCPC”), and the United States Department of Homeland Security (“DHS”) (all  
20 referred to collectively herein as the “Signatories” or individually as a “Signatory” pursuant to Sections  
21 106 and 110 of the National Historic Preservation Act (“NHPA”), 16 U.S.C. §§ 470f and 470h-2(f), the  
22 Section 106 implementing regulations at 36 CFR Part 800, and the 2008 Programmatic Agreement (“PA”)  
23 among GSA, ACHP, DCSHPO, FHWA (“Federal Highway Administration”), NCPC, and DHS regarding the  
24 Redevelopment of St. Elizabeths National Historic Landmark, Washington, D.C., dated December 9,  
25 2008, and amended June 4, 2018, which contemplated a multi-phased Redevelopment Project  
26 (“Redevelopment Project”) and the execution of one or more separate MOAs to develop and implement  
27 the project per 36 CFR § 800.6 (Exhibit 1); and

28 WHEREAS, St. Elizabeths (“St. Elizabeths”) is located in the Southeast quadrant of Washington, D.C. and  
29 consists of the 176-acre West Campus (“West Campus”) and the 173-acre East Campus (“East Campus”)  
30 divided by Martin Luther King, Jr., Avenue, SE (“MLK Avenue”), all of which contribute to the St.  
31 Elizabeths National Historic Landmark (NHL) (Exhibit 2). The West Campus is under GSA’s jurisdiction  
32 and is being redeveloped by GSA for occupancy by DHS. The East Campus and MLK Avenue are under  
33 the jurisdiction of the Government of the District of Columbia (“D.C. Government”); and

34 WHEREAS, GSA’s ongoing redevelopment of the West Campus has occurred in accordance with *The DHS*  
35 *Headquarters Consolidation at St. Elizabeths Final Master Plan, Washington, DC, November 10, 2008*  
36 (“2008 Master Plan”) as documented in the PA, and the subsequent *DHS Consolidation at St. Elizabeths*  
37 *Master Plan Amendment: Federal Use Parcel of the East Campus, Washington, DC, March 30, 2012*  
38 (“Master Plan Amendment”); and

39 WHEREAS, the adverse effects of the Master Plan Amendment were accounted for in *The Memorandum*  
40 *of Agreement among the United States General Services Administration, the Advisory Council on Historic*  
41 *Preservation, the Government of the District of Columbia acting by and through the Deputy Mayor for*  
42 *Planning and Economic Development, the District of Columbia Office of Planning, the District of Columbia*  
43 *Department of Transportation, the District of Columbia State Historic Preservation Office, the National*

44 *Capital Planning Commission, and the United States Department of Homeland Security Regarding*  
45 *Transportation Improvements along a Segment of Martin Luther King, Jr. Avenue and Construction of the*  
46 *Federal Emergency Management Agency Headquarters within the Federal Use Parcel on the East*  
47 *Campus of St. Elizabeths National Historic Landmark, Washington, D.C. ("2012 MOA"), executed on April*  
48 *19, 2012; and*

49 WHEREAS, on August 19, 2020, GSA notified the Signatories and Consulting Parties ("Consulting Parties")  
50 to the 2012 MOA that it was vacating the MOA because the undertaking proposed therein was not  
51 carried out and is not intended to be carried out now or in the future due to changed circumstances  
52 (Exhibit 3); and

53 WHEREAS, GSA plans to complete and implement the Second Amendment to the Master Plan for the  
54 Redevelopment of the St. Elizabeths West Campus ("Second Amendment"), which constitutes the  
55 undertaking ("Undertaking") and which will be attached herein without amendment of this MOA  
56 following approval by NCPC and acceptance by GSA (Exhibit 4); and

57 WHEREAS, the Undertaking, the Second Amendment, mainly will affect two areas of the West Campus:  
58 the Plateau ("Plateau") which includes Buildings 56/57, 60, 64, 66, 67, 68, and 69 and the Sweetgum  
59 Lane site ("Sweetgum Lane Site") which includes Building 15. Both areas encompass landscape features  
60 that contribute to the NHL, including the Ravine and the Athletic Field, as well as spatial organization  
61 and land use patterns, topography and drainage, circulation, views and visual relationships, landscape  
62 structures, constructed water features, and small-scale furnishings and objects; and

63 WHEREAS, the Undertaking includes design and construction of two new office buildings on the Plateau;  
64 design and construction of one new building at the Sweetgum Lane site; landscape and site work at the  
65 Plateau site including on the Plateau and in the Ravine; the rehabilitation of contributing Buildings  
66 56/57; the continued stabilization of Buildings 64 and 52; and the associated demolition of 6 buildings  
67 that contribute to the NHL: Buildings 15, 60, 66, 67, 68, and 69, upon appropriation from the U.S.  
68 Congress of sufficient funding for new construction; and

69 WHEREAS, GSA committed in the 2008 Master Plan and the 2008 PA to the rehabilitation and use of the  
70 historic buildings on the West Campus that contribute to the NHL, and this Undertaking, the Second  
71 Amendment, does not affect that commitment with the exception of the 6 buildings to be demolished;  
72 and

73 WHEREAS, GSA, during consultations leading to the MOA, committed to evaluating Building 69 to  
74 determine if it was feasible to retain it for federal government office space, and GSA reaffirmed the  
75 commitment to evaluate it at NCPC's commission meeting on November 7, 2019; and

76 WHEREAS, GSA determined an Area of Potential Effects ("APE")(Exhibit 5), as defined in 36 CFR §  
77 800.16(d) in the 2008 PA, and during consultation for this Undertaking GSA determined the APE for this  
78 Undertaking was the entire St Elizabeths NHL; and

79 WHEREAS, in consultation with DCSHPO, GSA will delineate Limits of Disturbance ("LOD") associated  
80 with each Design Submission ("Design Submission") under the Second Amendment in the process  
81 described in Stipulation III.C.2. of the PA; and

82 WHEREAS, NCPC will review the Second Amendment and the subsequent Design Submission  
83 components of the Undertaking pursuant to the National Capital Planning Act of 1952, and has

84 designated GSA lead agency for NCPC’s compliance pursuant to 36 CFR § 800.2(a). NCPC will rely upon  
85 the PA and this MOA to fulfill its Section 106 obligation for any approval action taken in its review; and

86 WHEREAS, GSA, in accordance with Stipulation III.C.1.c of the PA, consulted with NCPC, a Signatory, and  
87 with the U.S. Commission of Fine Arts (“CFA”), a Consulting Party, and anticipates determining  
88 appropriate submittal dates for the draft and final Second Amendment to the Master Plan and the  
89 eventual phases of Design Submissions; and

90 WHEREAS, as required under 54 USC § 306107 (commonly known as Section 110(f) of the NHPA) and its  
91 implementing regulations (specifically 36 CFR §§ 800.6 and 800.10), prior to the approval of any federal  
92 undertaking that may directly and adversely affect an NHL, the head of the responsible federal agency  
93 shall to the maximum extent possible undertake such planning and actions as may be necessary to  
94 minimize harm to the NHL; in accordance with the code and its implementing regulations, GSA has  
95 notified the ACHP and the U.S. Department of the Interior- National Park Service (DOI-NPS, as the  
96 Secretary of the Interior’s designee) of this consultation regarding the NHL property and invited the NPS  
97 to participate in the development of this MOA and to consult on the resolution of any adverse effects to  
98 the NHL as a consulting party; and

99 WHEREAS, pursuant to the National Environmental Policy Act, GSA has prepared a Supplemental  
100 Environmental Impact Statement (“2020 SEIS”) to address changed circumstances since the publication  
101 of the *Consolidation at St. Elizabeths Master Plan Amendment – East Campus North Parcel*  
102 *Environmental Impact Statement* in 2012. GSA has provided the 2020 SEIS for public comment in  
103 accordance with 36 CFR § 800.8(a)(1); and

104 WHEREAS, GSA consulted with the D.C. Government to ensure the goals and objectives of the Second  
105 Amendment are compatible with the District of Columbia’s *St. Elizabeths East Master Plan and Design*  
106 *Guidelines* (2012); and

107 WHEREAS, in coordination with the D.C. Department of Transportation (DDOT), GSA has assessed  
108 transportation needs and determined that no right-of-way improvements are necessary on MLK Avenue  
109 at this time for the implementation of the Second Amendment; and

110 WHEREAS, GSA initiated consultation with the federally recognized Delaware Tribe, which has historic  
111 ties to the area that includes the St. Elizabeths West Campus, provided notification of GSA’s  
112 determination of adverse effects, invited the tribe to participate in consultation, and the Tribe did not  
113 reply; and

114 WHEREAS, pursuant to 36 CFR 800.3(f), in addition to the Signatories to this MOA, GSA identified and  
115 invited to consult the following Consulting Parties: Advisory Neighborhood Commissions 8A, 8B, 8C, 8D,  
116 and 8E, CFA, The Committee of 100 on the Federal City, The Cultural Landscape Foundation, the D.C.  
117 Preservation League, the D.C. Office of Planning, DDOT, the National Trust for Historic Preservation, the  
118 U.S. Department of the Interior- National Park Service, and the U.S. Navy; and

119 WHEREAS, in consultation, GSA applied the Criteria of Adverse Effects (36 CFR 800.5(a)(1)) and  
120 determined that the Undertaking will have an adverse effect on the NHL due to the anticipated  
121 demolition of 6 contributing buildings; the proposed construction of new buildings with different  
122 locations, larger footprints, and significantly more mass than those proposed in the 2008 Master Plan;  
123 the alteration or demolition, during landscape and site work, of historic landscape features such as  
124 topography, circulation patterns, and vegetation; and the anticipated changes to the integrity of the

125 visual environment of the NHL. In addition, there is an intensification of the adverse effect previously  
126 determined in the PA on the adjacent eligible Congress Heights Historic District due to anticipated  
127 changes to the integrity of views from the historic district toward the proposed new buildings on the  
128 Plateau; and

129 WHEREAS, GSA completed archaeological assessments of the sites constituting the area of the Second  
130 Amendment and determined there is no known potential for adverse effect to archaeological resources,  
131 and that in the event of an unanticipated discovery, Exhibit 14 of the PA stipulates the procedures for  
132 notification and site treatment; and

133 WHEREAS, GSA notified the DCSHPO and ACHP of its adverse effect determination for this Undertaking,  
134 and continued its ongoing consultation with the Signatories and Consulting Parties to avoid, minimize, or  
135 mitigate adverse effects in accordance with the PA; and

136 WHEREAS, this consultation led to the Second Amendment to the Master Plan appended to this MOA,  
137 and, pursuant to Stipulation III.C.1 of the PA, will continue consultation with the Signatories and  
138 Consulting Parties during development of Design Submissions as described herein. Consultation is also  
139 informed by the Governing Documents as defined in Stipulation 1.a. herein and the Historic Structure  
140 Reports; and

141 WHEREAS, GSA informed the Signatories and Consulting Parties during consultation that GSA will  
142 continue to make consultation and non-sensitive Undertaking-related documents accessible to the  
143 public through a project website at [http://www.stelizabethsdevelopment.com/document\\_center.cfm](http://www.stelizabethsdevelopment.com/document_center.cfm)

144 NOW THEREFORE, the Signatories agree that the Undertaking will be implemented in accordance with  
145 the following Stipulations (“Stipulations”) in order to take into account the effect of the Undertaking on  
146 historic properties.

#### 147 **STIPULATIONS**

148 GSA will ensure the following measures are carried out:

##### 149 I. GENERAL REQUIREMENTS

##### 150 a. Reference Documents and Documentation

151 The Second Amendment provides, at the Master Plan level, GSA’s proposed massing, height,  
152 and scale for new agency buildings; landscape and site work; and rehabilitation and/or  
153 stabilization of historic buildings.

154 GSA’s Design Submissions will be based on the Second Amendment, the Secretary of the  
155 Interior’s Standards for the Treatment of Historic Properties (Rehabilitation), NPS  
156 Preservation Brief 31, the campus Cultural Landscape Report, the Landscape Preservation  
157 Plan, the Landscape Integration Plan, and the Architectural Resources Management Plan, all  
158 specific to the redevelopment of the St. Elizabeths West Campus. The Undertaking will also  
159 be carried out in accordance with the 2020 SEIS. Collectively, these documents will be  
160 referred to as governing documents (“Governing Documents”); and GSA also will comply  
161 with applicable Building and Life Safety Codes.

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b. Qualified Personnel

GSA will ensure that all historic preservation and archaeological work, if an unanticipated discovery is made, performed by GSA or on its behalf pursuant to this MOA, will be accomplished by or under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary of the Interior's Professional Standards located at [http://www.nps.gov/history/local-law/arch\\_stnds\\_9.htm](http://www.nps.gov/history/local-law/arch_stnds_9.htm).

II. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

GSA consulted with Signatories and Consulting Parties to determine the effects caused by the Second Amendment and measures to avoid, minimize, or mitigate them. GSA will take the following specific actions:

a. Avoidance Measures

GSA, pursuant to the protection measures stipulated in the PA, will ensure that the measures, including vibration monitoring and the physical and marked separation of new construction from adjacent historic buildings, are in place.

b. Minimization Measures

GSA, pursuant to the stipulations in the PA, will ensure that effects to historic landscape features and trees are avoided or minimized during construction. During consultation on the development of the Design Submissions, GSA will continue to seek ways to minimize adverse effects caused by the Second Amendment, and will take the following actions:

1. Retain the historic pedestrian pathways to the extent possible.
2. Design any new hardscape around new buildings in a manner that respects the NHL's historic landscape character in order to minimize the adverse effect to the landscape setting.
3. Augment the wooded buffer between the cemetery and the new building on the Sweetgum Lane site to avoid or minimize the potential effect on views from the cemetery toward the Sweetgum Lane site.
4. Install a green roof on the new building at the Sweetgum Lane site to minimize effects on views across the site.
5. Design the Plateau buildings to respond to views from within the West Campus, more distant views from the west, and into the site from the St. Elizabeths East Campus of the NHL along Redwood Street and Gate 3.
6. Follow the procedures set out in Exhibit 14 of the PA if unanticipated archaeological discoveries occur.
7. Inspect and reinforce current protective mothballing measures and make necessary repairs to historic buildings, in consultation with DCSHPO.

198 c. Mitigation Measures

199 GSA will take the following actions to mitigate adverse effects associated with this Second  
200 Amendment:

- 201 1. Conduct additional documentation, including digital documentation of the interiors  
202 and exteriors of Buildings 60, 66, 68, and 69 and make it available to the public  
203 through an online platform.
- 204 2. Provide tags with botanical information on historic trees as defined in the Landscape  
205 Preservation Plan within 5 years of the execution of this MOA, and replace historic  
206 trees removed for construction with the same or similar species in a nearby location  
207 as feasible and subject to guidance from GSA's Regional Horticulturalist and in  
208 consultation with the DC SHPO.
- 209 3. Create an online version of materials from the 2017-2018 St. Elizabeths exhibit at  
210 the National Building Museum, and add the interpretive sign program, and other  
211 educational materials and documentation, within 5 years of execution of this MOA  
212 and in consultation with the DCSHPO.

213 III. DESIGN REVIEW PROCESS

214 GSA will continue to follow the Consultation Process and Procedures for Design Submissions  
215 stipulated under III.C. of the PA and consult with Signatories and Consulting Parties for each  
216 component of this Undertaking. The components of the Second Amendment may advance  
217 individually.

218 IV. ALTERATIONS TO PROJECT DOCUMENTS

219 GSA will comply with the procedures laid out in Stipulation IX.C. of the PA.

220 V. DEMOLITION AND FURTHER EVALUATION

221 GSA will not demolish buildings that contribute to the NHL, including Buildings 15, 60, 66,  
222 67, 68, and 69 until the U.S. Congress appropriates sufficient funding for the construction of  
223 a new building that affects that historic building and GSA notifies the Consulting Parties of  
224 receipt of such funding in writing.

225 Further, for Building 69, GSA will also evaluate it to determine if it can be feasibly retained  
226 and used as federal government office space, will report findings to the Consulting Parties in  
227 writing, and will consider their comments on the findings. Should GSA's evaluation conclude  
228 that it can be feasibly retained and used by the federal government, this MOA will remain in  
229 force and a revised master plan amendment, if GSA determines it necessary, will be  
230 consulted on and attached herein without further amendment of this MOA. Should GSA's  
231 evaluation conclude that Building 69 cannot be feasibly retained and used by the federal  
232 government, GSA will notify the Consulting Parties of its decision in writing following the  
233 comment period.

234 VI. DISPUTE RESOLUTION  
235 For disputes initiated by Signatories, GSA will comply with procedures in Stipulation V. of the  
236 PA. For disputes initiated by Consulting Parties, GSA will comply with procedures in  
237 Stipulation VI of the PA.

238 VII. AMENDMENTS  
239 GSA will comply with procedures in Stipulation VII of the PA. If GSA, in consultation  
240 determines that there is an intensification of the adverse effect, GSA will propose amending  
241 this MOA as set forth in Stipulation VII of the PA.

242 VIII. TERMINATION  
243 GSA will comply with the procedures in Stipulation VII of the PA. If this MOA is terminated,  
244 the Signatories shall take such actions as are necessary to comply with all requirements of  
245 36 C.F.R. Part 800.

246 IX. DURATION  
247 This MOA shall remain in effect for a period of 15 years, unless extended through an  
248 amendment per Stipulation VII of the PA or terminated per Stipulation VIII of the PA.

249 Availability of Funds: Per Stipulation XII.B. of the PA, fulfillment of the terms of the projects in the  
250 Second Amendment and this Undertaking's MOA are subject to the availability of funds, pursuant to the  
251 Anti-Deficiency Act, 31 U.S.C. § 1341 *et seq.* This MOA is not an obligation of funds in advance of an  
252 appropriation of such funds, and it does not constitute authority for the expenditure of funds.

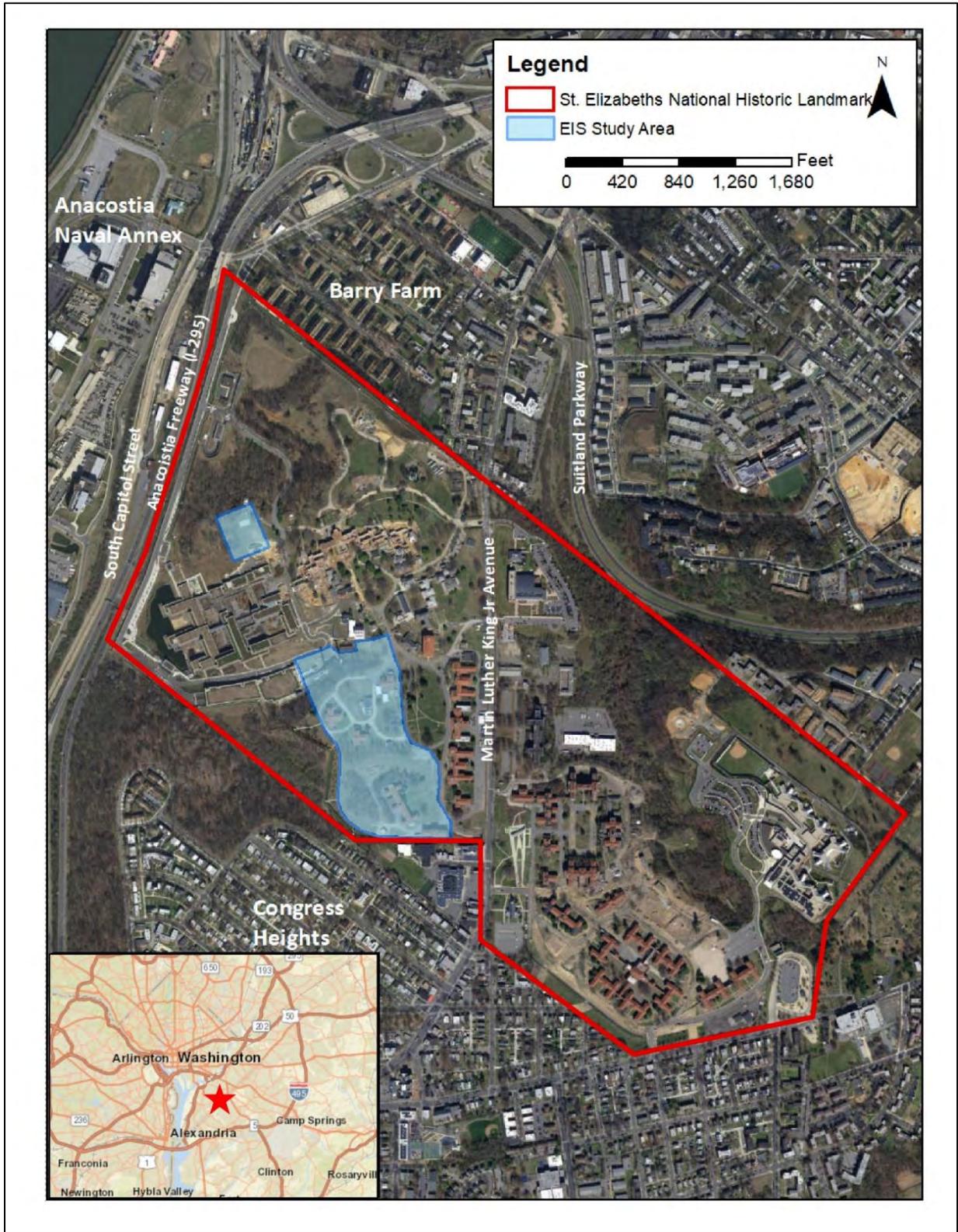
253 Execution and implementation of this MOA by the Signatories and implementation of its terms will  
254 evidence that GSA, as lead agency, has afforded DC SHPO, ACHP, DOI-NPS, the Signatories and  
255 Consulting Parties an opportunity to comment on the Undertaking and its effects on the St. Elizabeths  
256 NHL.

257 Signatures Follow

392 Exhibit 1: 2008 Programmatic Agreement (found on project website):

393 [http://assets.stelizabethsdevelopment.com/documents/document\\_center/St.Es\\_ProgAgreement\\_Final](http://assets.stelizabethsdevelopment.com/documents/document_center/St.Es_ProgAgreement_Final)  
394 [812091\\_20100419161713.pdf](http://assets.stelizabethsdevelopment.com/documents/document_center/St.Es_ProgAgreement_Final_812091_20100419161713.pdf)

395 Exhibit 2: St. Elizabeths National Historic Landmark. The EIS Study Area (shaded blue) defines the  
396 boundaries of the Second Amendment, defined as the Undertaking and the subject of this MOA.



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U.S. General Services Administration

The U.S. General Services Administration (GSA) is notifying you as a signatory/consulting party to this agreement that we are vacating the “Memorandum of Agreement for Transportation Improvements along a Segment of Martin Luther King, Jr. Avenue and Construction of the Federal Emergency Management Agency Headquarters within the Federal Use Parcel on the East Campus of St. Elizabeth’s National Historic Landmark, Washington, D.C.,” that was executed on April 19, 2012. Neither GSA nor any other party carried out any work under these stipulations or otherwise took any action to implement this Memorandum of Agreement (MOA). GSA did not initiate the undertaking proposed in the MOA. Therefore, effective immediately, GSA no longer has any Section 106 responsibility for this MOA’s undertaking.

This constitutes GSA’s written notice to all consulting parties of GSA’s decision to vacate the MOA. As of the date of this notice, this MOA is no longer in effect. Please contact Nancy Witherell at 202-251-4901 or nancy.witherell@gsa.gov for further information.

UNITED STATES GENERAL SERVICES ADMINISTRATION

August 17, 2020

By:

Date

Beth L. Savage  
Director, Center for Historic Buildings  
Federal Preservation Officer

DocuSigned by:  
  
A129529746E1427...

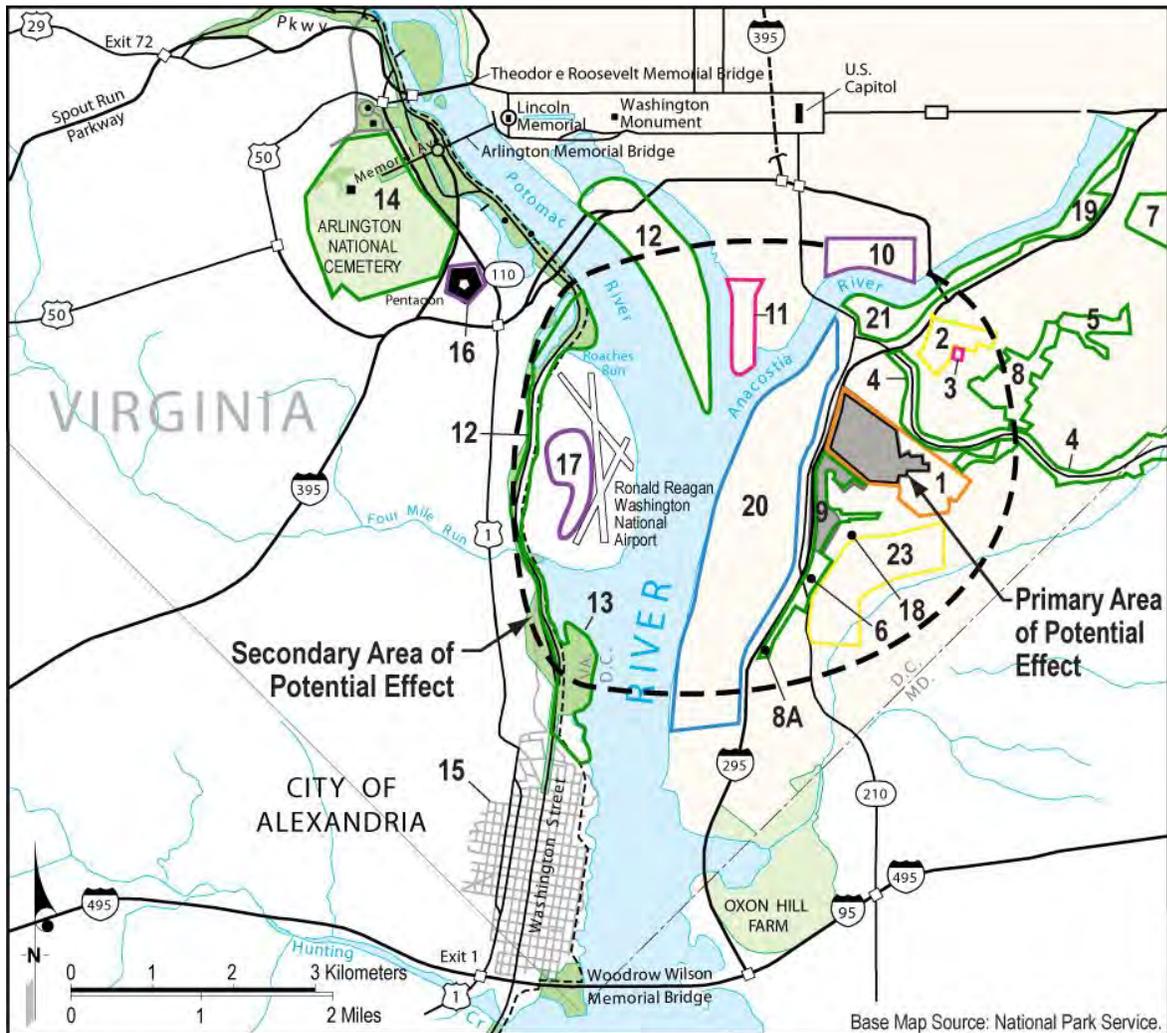
8/18/2020

By:

Date

Darren J. Blue  
Regional Commissioner  
Public Buildings Service  
National Capital Region

401 Exhibit 4: Final Approved Master Plan Second Amendment, to be added to this MOA without  
402 amendment following final approval by NCPC and acceptance by GSA.



**Historic Resources and Areas of Potential Effect**

**National Register Listed**

- 1 St. Elizabeths NHL
- 2 Anacostia Historic District
- 3 Frederick Douglass National Historic Site (Cedar Hill)
- 4 Suitland Parkway
- Civil War Fort Sites and Fort Circle Park System**
- 5 Battery Ricketts
- 6 Fort Carroll
- 7 Fort Dupont
- 8 Fort Stanton
- 8A Fort Greble
- 9 Shepherd Parkway
- 10 Washington Navy Yard  
Commandant's Office  
Quarters A and Quarters B  
Main Gate  
Washington Navy Yard Annex Historic District

- 11 Fort McNair  
Army War College
- 12 East Potomac Park
- 13 George Washington Memorial Parkway
- 14 Arlington Cemetery, Custis Lee Mansion
- 15 City of Alexandria Historic District
- 16 Pentagon
- 17 Ronald Reagan Washington National Airport
- 18 Congress Heights Firehouse
- National Register Eligible**
- 19 Anacostia Freeway
- 20 Bolling Air Force Base/Naval Annex
- 21 Anacostia Park
- 22 Congress Heights Historic District

(Color outlines are for clarity only.)

# U. S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

25 September 2020

Dear Ms. Wright:

In its public meeting of 17 September conducted by videoconference, the Commission of Fine Arts approved, based on its prior review of the submission materials, the proposed Amendment 2 to the Master Plan for the Department of Homeland Security consolidation at the St. Elizabeths West Campus, concerning the proposed new construction of 1.375 million square feet of office space at the Richardson Quad plateau area and the Sweetgum Lane site.

The Commission looks forward to the forthcoming review of individual projects, such as the new facility for the Cybersecurity and Infrastructure Security Agency, as they are submitted under the amended master plan. As always, the staff is available to assist you.

Sincerely,



Thomas E. Luebke, FAIA  
Secretary

Mina Wright, Director  
Office of Planning & Design Quality  
General Services Administration, National Capital Region  
1800 F Street, NW, Suite 4400  
Washington, DC 20405

cc: Otto Condon, ZGF  
Hallie Boyce, OLIN