



CCRIC Citizens to Conserve and Restore Indian Creek
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January 6, 2016

Ms. Denise Decker
NEPA Team Lead
U. S. General Services Administration
National Capital Region
3017th Street, SW, Room 4004
Washington, DC 20407

Re: FBI Headquarters Consolidation
Draft Environmental Impact Statement (DEIS) Comments

Dear Ms. Decker:

Citizens to Conserve and Restore Indian Creek (CCRIC) is an organization of Prince George's County residents who care about improving the health of the Indian Creek watershed. We appreciate the opportunity to review and comment on the DEIS, as the Greenbelt alternative for the relocation of the FBI Headquarters is situated within the Indian Creek watershed.

Other groups have commented on the overall environmental benefits of placing the new FBI headquarters on the Greenbelt Metro parking lot, as discussed in the DEIS: this location would allow the most use of public transit for FBI workers and would thus reduce air pollution and the attendant nutrient deposition in the waterways and greenhouse gas emissions. In addition, redevelopment of the Greenbelt Metro parking lot would result in the remediation of the current poor stormwater controls there. However, we have concerns about impacts to the existing natural environment at the Greenbelt site.

The conceptual site plan presented in the DEIS raises some concerns about impacts to Indian Creek and its forested floodplain. Assurances are given in the executive summary and Chapter 2 (pages ES-8 and 20) that the security "fence line excludes Indian Creek stream channels and wetlands; facility development excludes wetlands and floodplains" and that "the entire riparian area would be preserved as security easement." On page 23 of the DEIS there is a paragraph explaining that "during the planning process, GSA and the FBI responded to public and agency concerns regarding potential adverse effects on natural resources within the Indian Creek riparian area by relocating the planned perimeter security fence" and that this relocation "would largely avoid the 100-year Federal Emergency Management Agency (FEMA) floodplain, and exclude existing wetlands (including a 25-foot non-tidal wetland buffer required by the Maryland Department of the Environment [MDE]) and streams." However, questions remain to be answered about how the riparian area may be impacted.

In Section 5.2.1.1 (on page 283) the DEIS notes that “Over the long term, it is assumed that minimal re-engineering of Indian Creek would be required because of the distance between the easterly limit of disturbance and the existing stream channel, based on the current mixed-use development site plan.... Over the long term, there could be adverse impacts to Indian Creek resulting from any engineering measures that would be implemented along the secure perimeter, adjacent to Indian Creek, to control erosion and minimize the channel shifting, a characteristic of braided stream channels.” The DEIS argues that the benefits of improved stormwater management of the area currently in use as a parking lot would outweigh these long-term adverse impacts. Close attention will need to be focused over the coming years to verify that the overall environmental benefits of such development at Greenbelt Station are indeed a net environmental benefit. However, we emphasize that almost never can engineered mitigation improve water better than protecting an existing permeable forest soil; saving the Chesapeake Bay and Anacostia watershed starts here in the headwaters.

The concluding chapter of the DEIS states that “the Greenbelt Alternative has approximately 2 acres of undeveloped land along the edge of the existing parking lot that would be disturbed under that alternative” (page 620, in the section on “Irreversible and Irrecoverable Commitments of Resources”); additionally, one of the presentations at the public hearing in Greenbelt on December 8, 2015, a GSA consultant stated that these two acres include approximately one acre of floodplain. There is confusion about where these impacts are, as no maps clearly delineate their extent; the final EIS should include mapping clearly showing where these two acres are located.

The location of the eastern perimeter security fence in the conceptual site plan presented in the DEIS does not require additional vehicular access along the interior of the fence. However, if the final design were to move the fence further east such an interior roadway may also be required, adding significant impacts to the riparian area.

The DEIS of necessity works with conceptual site plans, but these plans may be changed in the final design process that will follow selection of the site. A firm federal commitment is needed to not impact “the entire riparian area”: Indian Creek, the undeveloped land to the east of Indian Creek, and a reasonable buffer to the west of Indian Creek.

Concerns have been raised about the negative effect on the local hydrology if the buildings were to include basement levels extending below the water table. As the DEIS notes that the water table is only ten feet below the parking lot, this requires planning for no basement levels. At the Greenbelt City Council meeting of January 4, 2016, Greenbelt city staff and Mr. Garth Beall of Renard Development Company, LLC, stated that the details of the planned buildings do not appear to include basement levels. The final EIS should address this issue by confirming that basement levels will not be installed below the water table.

Beyond the proposed building site, the DEIS also proposes transportation mitigation construction that would impact riparian zones within the Indian Creek and Beaverdam Creek watersheds upstream of the proposed building site. However, the discussion of transportation issues in Section 5.1.9 suggests that the vehicular impacts of the project on the intersections along Edmonston Road (MD 201) are not significant enough to be dealt with by this project.

Beyond these major concerns, we have noted some errors that should be corrected in the final EIS, as listed below.

In Section 5.0 (on page 219), the description of the Greenbelt site as "... bound on ... the east by Cherrywood Lane...based on an option agreement signed with the Washington Metropolitan Area Transit Authority (WMATA) and the A.H. Smith Development Company (AKA: Renard Development Company, LLC) in 2014" is incorrect. The eastern boundary of the site is congruent with the eastern boundary of land owned by the State of Maryland (Parcel 93 on Tax Map 26). The eastern boundary of the WMATA/Renard option agreement must be the eastern boundary of the WMATA-owned land, which would also be the western boundary of land owned by the State of Maryland.

In Section 5.1.1.2, both Table 5-1 (on page 222) and the text on page 223 incorrectly identify the Zekiah and Issue soils complex as non-hydric, while also incorrectly identifying the Russet-Christiana-Urban land complex as hydric. USDA/NRCS's current list of hydric soils in Prince George's County is available online at <http://extension.umd.edu/anmp/soils-data-stream-determination-county>

In Section 5.1.2.2 (on page 225) the text states that "stormwater from the impervious surfaces is directed to {two} detention ponds as well as through two culverts that outlet directly to Indian Creek. One is an approximately 115 foot culvert that outlets directly from the site to Indian Creek and the second is an approximately 45 foot box culvert located approximately 150 feet to the east of the site." The maps in the DEIS do not show these culverts. It is not clear how a box culvert "150 feet to the east of the site" could be draining from the parking lot into Indian Creek; is this box culvert under Cherrywood Lane, accommodating the flow of the tributary draining from Greenbelt Lake?

Section 5.1.2.4 (on pages 225-226) provides detailed discussion of three wetland delineations that "indicate the presence of between 5.4 and 32.8 acres of freshwater forested wetlands surrounding Indian Creek." The discussion on these pages adequately addresses the limitations of all three of these wetland delineations, but discussions in other parts of the DEIS use the smallest delineation.

In Section 5.2.10.2 (Air Quality, Mobile Source Impacts; page 244) relates to CO hotspots for affected signalized intersections. Traffic idling at the entrance and egress gates should be included in this data. This could adversely affect the airshed.

Maryland DNR's scoping comments (on page 55 in Appendix A) state that a "State-listed sensitive plant species is found in the Indian Creek stream corridor in this area (further information available upon request and coordination). Previous detailed reviews of this site have determined that the plant can be appropriately conserved by minimizing impacts in the natural floodplain and stream corridor." However, the DEIS does not address this State-listed sensitive plant species in Sections 5.1.3.1 and 5.1.3.4 (pages 229 and 233).

In Section 5.1.4.1 (on page 234), the second paragraph states that "the southeast portion of the site, owned by the State of Maryland, consists of almost entirely woodlands and wetlands, and contains segments of the Indian Creek and associated unnamed tributaries..." However, the state does not own the entire wooded stream valley portion of the site, as the boundary between WMATA's parcel and the state-owned parcel zig-zags across Indian Creek within the site. The second paragraph goes on to state that "... Maryland's Board of Public Works (BPW)...approved the granting of an approximately 22-acre security easement to the Federal Government on this state-owned land that would preserve this land in its current state." As the state does not own the entire wooded stream valley portion of the site, this 22-acre security easement does not encompass all of the wooded stream valley portion of the site. This confusion about the ownership of the southeast portion of the site creates a lack of clarity in statements in other parts of the DEIS that "the entire riparian area would be preserved as security easement" (Page ES-8), as the 22-acre security easement from the state would not encompass the entire riparian area. This confusion should be clarified in final EIS by the presentation of maps with the property boundaries and the clear definition of the "security easement" as including both the 22-acres of the state-owned undeveloped land as well as the approximately six acres of adjacent WMATA-owned undeveloped land.

In Section 5.1.4.1 (on page 234), the second paragraph also states that "BPW would consider extending approval for another year (Sanford 2015)"; however, "Sanford 2015" is not in the Reference List in Chapter 13.

Once again, we appreciate the opportunity to review and comment on the DEIS.

Sincerely,
Lutz Rastaetter
Acting Chair