

**ADDENDUM TO THE 2008 RECORD OF DECISION
FOR THE
PROPOSED WEST CAMPUS ACCESS ROAD
BETWEEN GATE 4 AND ITS INTERSECTION WITH
AN IMPROVED FIRTH STERLING AVENUE
DEPARTMENT OF HOMELAND SECURITY
HEADQUARTERS CONSOLIDATION AT ST. ELIZABETHS
IN SOUTHEAST, WASHINGTON, DC**

1. Background and Purpose of and Need for Development on the St. Elizabeths Campus

1.1 GSA's Acquisition of the St. Elizabeths Campus

One of the U.S. General Services Administration's (GSA) principal missions is to provide secure office space for Federal agencies throughout the United States, including the Washington metropolitan area. GSA obtained control of the former hospital known as St. Elizabeths in Southeast Washington, DC, in 2004 in anticipation of meeting a portion of the need for secure Federal office space in the National Capital Region (NCR).

On June 7, 2005, GSA issued a Notice of Intent (NOI), and on June 28, 2007, a revised NOI, to prepare an Environmental Impact Statement (EIS) for the proposed redevelopment of the St. Elizabeths West Campus. This EIS is henceforth referred to as the 2008 Final Master Plan EIS. 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 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 Record of Decision (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, plus parking, on both the West and East portions of the St. Elizabeths Campus.

The intent of this ROD Addendum is to describe the decision to be made regarding the construction of the proposed West Campus Access Road from Gate 4 along the western boundary of the West Campus to the intersection of the West Campus Access Road with Firth Sterling Avenue and improvements to that intersection. The transportation improvement Proposed Action covered under this Addendum is to accommodate additional roadway needs for the occupancy of the U.S. Coast Guard facility on the St. Elizabeths West Campus by 2013; however, immediate approval of this ROD addendum is required to permit commencement of construction for the West Campus Access Road. This transportation improvement has been

revised since the 2008 Final Master Plan EIS, which warranted this ROD Addendum. GSA is authorized to issue a ROD Addendum pursuant to its *National Environmental Policy Act Desk Guide, Final Guidance*, Chapter 8, dated October 1999 (per 40 C.F.R. § 1502.9).

1.2 Purpose and Need

The primary purpose of the Proposed Action described herein is to develop transportation improvements to support DHS Headquarters consolidation, including construction of the proposed West Campus Access Road northward from Gate 4 on the western side of the West Campus and improvements at the Firth Sterling Avenue/West Campus Access Road intersection.

The primary need for the Proposed Action is to obtain secure space in the NCR, to continue the consolidation of DHS Headquarters on a secure campus, and provide transportation improvements necessary to support development on the St Elizabeths Campus.

1.3 West Campus Access Road

The intent of this ROD Addendum is to approve the implementation of the transportation improvements necessary along the Firth Sterling Avenue/proposed West Campus Access Road intersection and the addition of bus bays to the West Campus Access Road to implement the purpose of and need for the Proposed Action. These transportation improvements would be required to support redevelopment of St. Elizabeths.

Extensive coordination with the District of Columbia Department of Transportation (DDOT) and development of traffic studies during design and planning activities for the St. Elizabeths Campus subsequent to the 2008 Final Master Plan EIS have resulted in refinements to transportation improvement alternatives. The original transportation improvement alternatives evaluated in the 2008 Final Master Plan EIS did not adequately reflect transportation impacts on the surrounding area beyond the actual boundaries of the St. Elizabeths Campus, and it was determined that a more detailed analysis of needs and impacts was necessary, including reevaluation of the number of vehicle trips and travel routes anticipated to and from the campus. Various transportation modes were analyzed, and the construction of a proposed West Campus Access Road would provide vehicle and pedestrian connections from Firth Sterling Avenue south to Gate 4 on the St. Elizabeths West Campus. Improvements to the Firth Sterling Avenue intersection with the proposed West Campus Access Road are also proposed to aid the flow of transportation. **Figure 1** shows the project area for the West Campus Access Road. These transportation improvements are discussed in detail in **Section 2.1.3**.



Figure 1. Location Map showing the West Campus Access Road Project Area from Gate 4 to the Intersection with Firth Sterling Avenue

2. West Campus Access Road Alternatives Considered

2.1 Alternatives Studied in Detail

2.1.1 Alternatives Considered in the 2008 Final Master Plan EIS and ROD

The transportation alternatives associated with DHS consolidation at St. Elizabeths analyzed in the 2008 Final Master Plan EIS were identified as Alternatives I-1 through I-4. A common element to all alternatives is that the West Campus Access Road would parallel I-295 through the West Campus, and continue south through the Shepherd Parkway before tying into Malcolm X Avenue near the reconstructed Malcolm X Avenue/I-295 interchange. The West Campus Access Road would be a three-lane, two-way road that connects from Firth Sterling Avenue, SE to Malcolm X Avenue. The center lane would operate as a reversible lane that would accommodate inbound and outbound peak directional traffic flow. Additional lanes would be provided at Gate 4 for turn lanes and vehicle queuing for security processing. Each of the alternatives analyzed in the 2008 Final Master Plan EIS required the acquisition of land for the widening of Firth Sterling Avenue and reconfiguration of the intersection with Stevens Road and Barry Road.

The preferred transportation improvement alternative analyzed in the 2008 Final Master Plan EIS and ROD was Alternative I-2. Under this alternative, the intersection of Firth Sterling Avenue with Stevens Road and Barry Road, located a block north of St. Elizabeths West Campus, would be reconfigured to allow a functional and safe tie-in of the West Campus Access Road to the West Campus, and new streetcar tracks would be relocated. The Frontage Road and Stevens Road legs of the intersection would be realigned. A slip ramp would be constructed for movements from eastbound Firth Sterling Avenue to the West Campus via the West Campus Access Road. Barry Road would be a one-way road heading northbound. Land along Firth Sterling Avenue would need to be acquired to allow for widening of the roadway and reconfiguration of the intersection with Stevens Road and Barry Road. Shuttle bus turnaround areas, to include opportunities for alighting/boarding, would be provided along the West Campus Access Road in the northwestern and southwestern corners of the West Campus to minimize shuttle buses using other major roadways while traveling to and from nearby Metrorail stations.

After crossing the northwest perimeter of St. Elizabeths West Campus, the access road would run parallel to I-295, before tying into a four-lane, two-way gated entrance (Gate 4) to the south of the West Campus Cemetery. Retaining walls would border the access road on both sides for slope stabilization purposes.

2.1.2 Alternatives Considered in St. Elizabeths TTR

Following the 2008 Final Master Plan EIS and ROD, it was determined that a more regional approach should be considered for developing transportation solutions to fully address the transportation needs for DHS consolidation. A collaborative team of GSA, DDOT, the Federal Highway Administration (FHWA), DHS representatives, and transportation planning and

engineering consultants was assembled to develop the 2010 St. Elizabeths Technical Transportation Report (TTR) that addressed not only the DHS requirements but also the future growth of the area. The TTR evaluated in detail two transportation improvement alternatives for DHS consolidation at St. Elizabeths, Alternative 1 and Alternative 2. The West Campus Access Road portion of Alternative 1 includes the following features:

- A new north-south, three-lane West Campus Access Road that provides vehicle and pedestrian connections between Firth Sterling Avenue and Gate 4. The West Campus Access Road would include two inbound lanes and one outbound lane between the West Campus and the surrounding street network. Campus access would be provided at Gate 4. The northern terminus of the West Campus Access Road with Firth Sterling Avenue would be a three-leg signalized intersection.
- Firth Sterling Avenue would be widened to accommodate exclusive left-turn lanes at the intersections with the West Campus Access Road and Eaton Road. A new signal would be installed at the Firth Sterling Avenue/Eaton Road intersection. Access between Stevens Road and Firth Sterling Avenue would be removed, with access provided via Eaton Road.
- Bus bays to accommodate 10 buses simultaneously and associated bus turnaround areas would be constructed along the eastern side of the West Campus Access Road on the St. Elizabeths Campus. The turnaround areas presented in the 2008 Final Master Plan EIS were not appropriately sized and have been slightly enlarged as now shown under the Preferred Alternative.
- Retaining walls would border the access road on both sides for slope stabilization purposes.
- A 10-foot multi-purpose trail would be constructed along the West Campus Access Road.

Alternative 2 would be similar to Alternative 1, except for the following:

- The northern terminus of the West Campus Access Road with Firth Sterling Avenue would be a four-leg signalized intersection (instead of three-leg) and would include a connection to Stevens Road.
- Firth Sterling Avenue would be widened to accommodate straight-through lanes at intersections with West Campus Access Road/Stevens Road. A new signal would be installed at the Firth Sterling Avenue/West Campus Access Road intersection.

2.1.3 Preferred Alternative

Refinement and analysis of the above alternatives resulted in identification of the Preferred Alternative for the West Campus Access Road north of Gate 4 and its intersection with Firth Sterling Avenue. The West Campus Access Road would include two inbound lanes and one

outbound lane between the West Campus and Firth Sterling Avenue. Campus access would be provided at Gate 4. Retaining walls would border the access road on both sides for slope stabilization purposes. The new intersection would modify the existing intersection of Firth Sterling Avenue at Barry Road/Stevens Road/Eaton Road. Under this transportation improvement, vehicles moving westbound on Firth Sterling Avenue would be able to make a left turn onto the proposed West Campus Access Road or continue straight onto Firth Sterling Avenue. The recently constructed streetcar tracks along Firth Sterling Avenue would not require relocation. Eaton Road would be extended from its current terminus of Firth Sterling Avenue to intersect with Firth Sterling Avenue and Barry Road. A new traffic signal would be installed at the new intersection at Eaton Road and Firth Sterling Avenue. The proposed new intersection would include new traffic signals, which would be reviewed and approved by DDOT prior to construction, and are subject to modification based on DDOT comments during the review and approval process.

Figure 2 shows a conceptual drawing of the proposed West Campus Access Road from Gate 4 to the intersection with Firth Sterling Avenue under the Preferred Alternative. **Table 1** presents a comparison of the West Campus Access Road proposed and analyzed in the 2008 Final Master Plan EIS and ROD and identified as the Preferred Alternative in this ROD Addendum.

Buses serving this portion of the St. Elizabeths Campus would primarily be shuttles run between the West Campus and the nearby Anacostia and Congress Heights Metrorail stations and local and express Metrobuses and commuter buses. Approximately 10 bus bays (i.e., seven sawtooth and three parallel bus bays) providing service to the West Campus would be constructed along the eastern side of the proposed West Campus Access Road between Gates 4 and 6. The seven sawtooth bus bays are offset from one another by connecting curb lines constructed at an angle from the travel lanes. This configuration minimizes the length parallel to the roadway needed for a bus to pull in and out and generally allows for easier access for multiple buses along the curb. The seven sawtooth bays would be constructed between Gates 4 and 5, and the three parallel bays would be constructed between Gates 5 and 6, totaling 930 linear feet.

2.1.4 No Action Alternative

Under the No Action Alternative, the West Campus Access Road north of Gate 4, as identified under Alternative I-2 in the 2008 Final Master Plan EIS and ROD (see **Section 2.1.1**), would be implemented to provide access to the St. Elizabeths West Campus. **Figure 3** shows a conceptual drawing of the proposed West Campus Access Road from Gate 4 to the intersection with Firth Sterling Avenue under the No Action Alternative. The improvements to Firth Sterling Avenue to accommodate the intersection with the West Campus Access Road were less extensive than under the Preferred Alternative as identified in this ROD Addendum. The No Action Alternative also included bus turnaround areas to allow opportunities for boarding and alighting in the northwestern and southwestern corners of the West Campus.

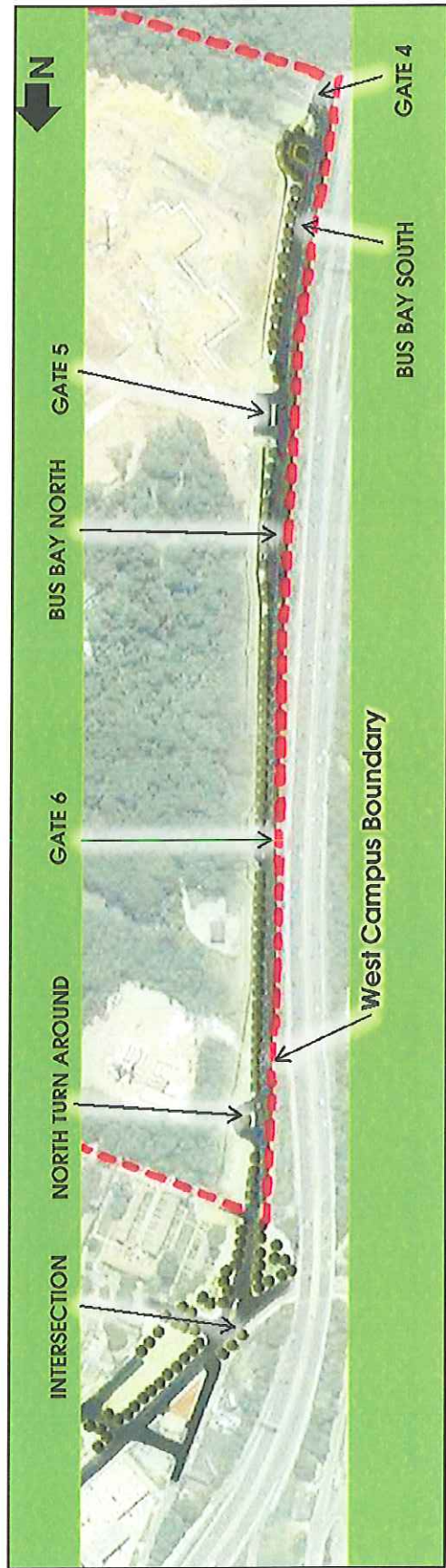


Figure 2. Conceptual Schematic of the Preferred Alternative

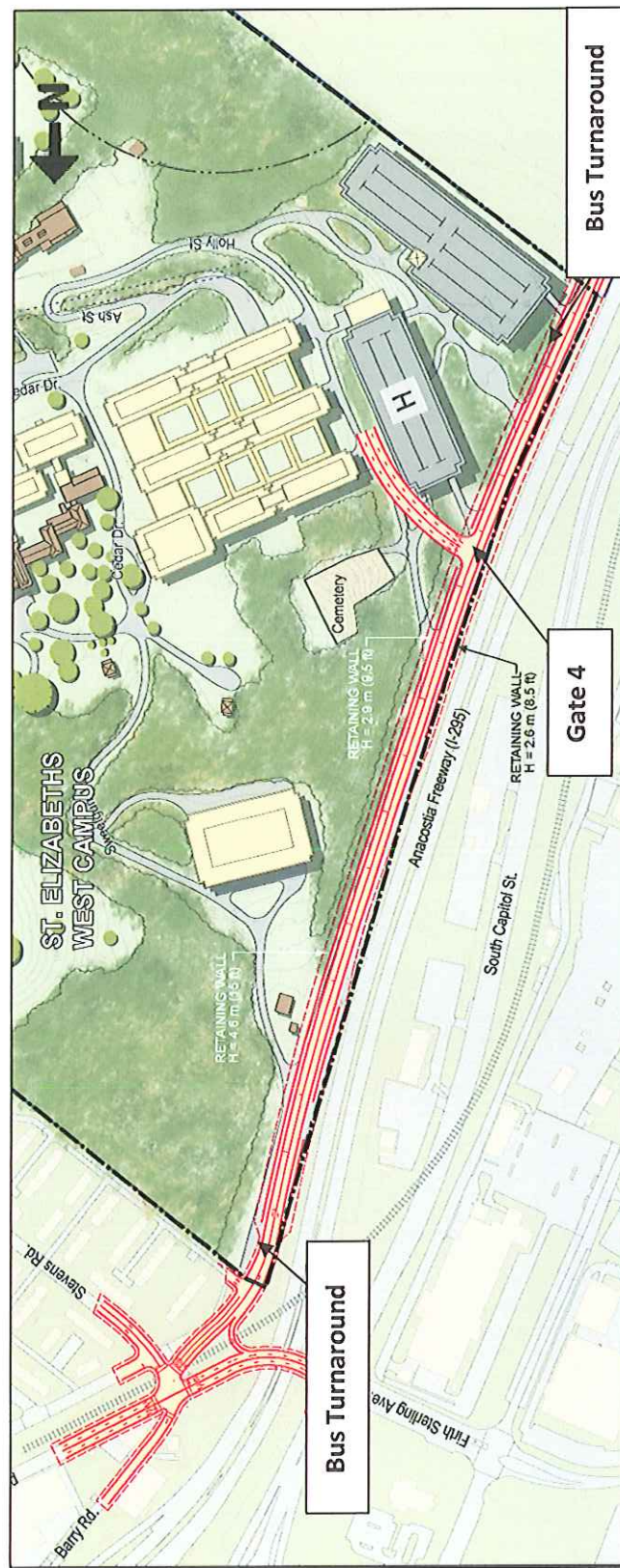


Figure 3. Conceptual Schematic of the No Action Alternative

Table 1. Modifications to the Proposed West Campus Access Road/Firth Sterling Avenue Intersection since the 2008 Master Plan EIS and ROD

West Campus Access Road Proposed and Analyzed in 2008 Final Master Plan EIS and ROD	Preferred Alternative
Firth Sterling Avenue widened to accommodate additional lanes.	Existing width of Firth Sterling Avenue would remain unchanged.
No realignment of proposed streetcar tracks along Firth Sterling Avenue.	No change. Constructed streetcar track alignment is unchanged.
One large traffic island at the Firth Sterling Avenue/West Campus Access Road intersection.	One small traffic island.
Channelized right turns from eastbound Firth Sterling Avenue to West Campus Access Road.	No channelized right turns.
Back alley along the property line of Barry Farm and St. Elizabeths would connect to the West Campus Access Road.	No change.
No multi-purpose trail along the West Campus Access Road, unless the road is reduced to two lanes.	A 10-foot multi-purpose trail running along the eastern side of the West Campus Access Road, then heading west along the southern side of Firth Sterling Avenue and continuing onto South Capitol Street.
At the Firth Sterling Avenue intersection: four lanes with a shared left turn and a through lane at Stevens Road.	Four lanes with no exclusive left-turn bays and four lanes with left turns restricted at Stevens Road and Eaton Road.
Eastbound Firth Sterling Avenue approach: one lane is a shared left turn and through lane; and one lane is a shared right turn and through lane.	One lane is a through lane, and one lane is a shared right turn and through lane.
Westbound Firth Sterling Avenue approach: one lane is a shared left turn lane and through lane and one lane is an exclusive through lane.	One lane is shared right turn and through, one lane is shared left turn and through; or one lane is shared right turn and through and one lane is through.
Northbound West Campus Access Road approach: one lane is an exclusive left turn, and one lane is shared through and right turn. One lane runs southbound from Firth Sterling Avenue on West Campus Access Road.	One lane is an exclusive left turn, and two lanes are through lanes to Firth Sterling Avenue. Two lanes run southbound from Firth Sterling Avenue on West Campus Access Road.
Stevens Road: One lane in each direction connects to Firth Sterling Avenue.	One-way southbound from Firth Sterling Avenue (maintaining existing condition) with flexibility to become two-way in the future.
No connection between Eaton Road and Firth Sterling Avenue (maintain existing condition).	Eaton Road is a two-lane road that connects to Firth Sterling Avenue.
Through movement between the West Campus Access Road and Firth Sterling Avenue.	Maintains the through movement along existing Firth Sterling Avenue.
Bus turnaround areas to include opportunities for boarding/alighting in the northwestern and southwestern corners of the West Campus.	Approximately seven sawtooth and three parallel bus bays providing service to the West Campus along the West Campus Access Road between Gates 4 and 6, and bus turnarounds.

2.2 Alternatives Considered but Dismissed from Further Study

In addition to the transportation improvement alternatives carried forth for analysis in the 2008 Final Master Plan EIS and the TTR, other alternatives were considered but eliminated from further detailed study in the EIS as a result of operational and safety concerns and an inability to meet DHS consolidation program needs. Alternatives considered but eliminated in the 2008 Final Master Plan EIS are presented in that document. Alternatives considered but eliminated since that document was prepared are identified as follows:

- Reconfiguration of South Capitol Street as a pair of one-way frontage roads on either side of I-295, with a connection to Gate 4 provided via a two-connector road/overpass set of at-grade intersections. The West Campus Access Road would be incorporated as a part of South Capitol Street under this alternative, which raised security concerns and conflicts with DHS' programmatic needs.
- Stand-alone Transportation System Management (TSM) improvements, including widening and reconfiguring local roadways, upgrading traffic signals, and expansion of the regional transit network, are capable of providing only a partial solution. The evaluation showed that although these elements are essential to overall project success, implementing the TSM alternative alone would not fully meet the needs of the project and result in an unacceptable increase in the number of failing intersections.
- An alternative configuration for a roundabout at the Firth Sterling Avenue/West Campus Access Road intersection was eliminated because the traffic circle would require extensive signalization to reduce conflicts between vehicles, pedestrians, and the Anacostia Streetcar line. This amount of signalization would nullify the reasoning for a roundabout in the first place. This alternative would also require obtaining CSX railroad property.
- Alternatives for different configurations of bus bays along the West Campus Access Road were considered, including parallel bus bays. Bus bay options eliminated included those that would require unacceptable bus bay widths, pedestrian walking times, and retaining wall heights; result in increased impacts on cultural resources and visual resources; and cause a lack of easy accessibility to all bus bays.
- Various other alternatives to provide access from these roadways to the St. Elizabeths Campus were considered, including the following:
 - Use of one reversible lane on the proposed West Campus Access Road (i.e., assuming Transportation Improvement Alternative I-2 from the 2008 Final Master Plan EIS).
 - Elevation of the access road on piers (e.g., viaduct) to eliminate retaining walls.

However, these alternatives or hybrids of these alternatives were eliminated primarily for one or more of the following reasons: the alternative was not feasible due to excessive vehicle delays and queue lengths; the alternative was not constructible and, therefore, not feasible; the alternative would result in unacceptable adverse impacts on cultural resources in the vicinity; or the alternative did not meet DHS access and operational needs for the St. Elizabeths Campus.

3. Public Involvement

Federal, state, and local agencies; stakeholder groups; and the general public have had opportunities to provide input and comment on the proposed redevelopment of the St. Elizabeths East Campus for the DHS consolidation program during several National Environmental Policy Act (NEPA) compliance processes, National Historic Preservation Act (NHPA) Section 106 processes, and other forums such as the St. Elizabeths Transportation Task Force.

Agencies and stakeholders that GSA has consulted with regarding DHS development at St. Elizabeths include Joint Base Anacostia-Bolling, National Park Service (NPS), the Architect of the Capitol, DDOT, FHWA, National Capital Planning Commission (NCPC), U.S. Commission on Fine Arts (CFA), District of Columbia Office of Planning (DCOP), District of Columbia Deputy Mayor's Office for Economic Development (DMPED), District of Columbia Water and Sewer Authority (DC Water), District of Columbia Department of Mental Health, District of Columbia Unified Communications Center (UCC), the District of Columbia Department of Public Works, Washington Metropolitan Area Transit Authority (WMATA), and multiple "Consulting Parties" identified in **Section 3.3**. GSA has continued to meet with the public, stakeholder groups, and government agencies throughout planning for DHS consolidation at St. Elizabeths.

3.1 Public and Agency Review of the 2008 Final Master Plan EIS

A public scoping meeting and subsequent public hearing for the 2008 Final Master Plan EIS were held in 2005 and 2007, respectively. Key issues related to the West Campus Access Road identified during scoping and from meetings with the public and agencies during development of the EIS included the following:

- Preservation of the historic St. Elizabeths West Campus
- Safety and security of area residents
- Impacts on traffic and access to mass transit
- Cemetery on the St. Elizabeths West Campus
- Impacts on forested areas.

3.2 Public Involvement for Subsequent NEPA Studies and Traffic Studies

Master Plan Amendment EIS. In 2009, GSA issued an NOI to prepare an EIS for a Master Plan Amendment for DHS consolidation at St. Elizabeths, which is addressing DHS development on the East Campus and reevaluating transportation improvement alternatives associated with DHS development at St. Elizabeths. A public scoping meeting for this EIS was held in October 2009, followed by a public hearing for the Draft EIS in January 2011. An additional public meeting was held in February 2011 after the public comment period for review of the Draft EIS was requested to be extended from 45 to 75 days. In total, 161 issues were identified in comments received during the public review period, including the following transportation issues:

- Concern that DHS employee traffic would traverse through and vehicles would be parked in local neighborhoods
- Impacts from construction vehicles traveling on local streets and degrading roadways
- Impacts on traffic during levels of heightened security
- Coordination between GSA and other agencies (e.g., WMATA) pertaining to the planned bus routes and bays
- Location and orientation of transportation alternatives
- Insufficient identification of mitigation measures
- Questions regarding the benefits to Ward 8 residents.

All comments received during the 75-day public review period for the Draft Master Plan Amendment EIS will be considered during the preparation of the Final Master Plan Amendment EIS. A 30-day period in spring 2012 will provide the public with an opportunity to review the Final Master Plan Amendment EIS.

St. Elizabeths Transportation Study Public Meetings. GSA and DDOT offered District of Columbia Ward 8 constituents an opportunity to provide input on the St. Elizabeths transportation improvements at a Sustainable Transportation for the Future of Ward 8 open house hosted by DDOT in December 2009 and a Ward 8 Transportation Study community meeting in December 2010.

Ongoing Transportation Task Force Meetings. As part of the ongoing regional transportation assessment, GSA, along with DDOT and Ward 8 Councilmember Marion Barry, assembled a team of community representatives in early 2011 to participate on a Ward 8 Transportation Task Force. This task force is responsible for reviewing the proposed transportation improvements, disseminating the information to other community members, and considering community member concerns. GSA continues to meet with the Ward 8 Transportation Task Force approximately once a month.

3.3 Section 106 Consultation

GSA has participated in ongoing consultation under the NHPA Section 106 process for DHS consolidation at St. Elizabeths with more than 25 agencies and organizations, otherwise known as Consulting Parties, including the following:

- Advisory Council for Historic Preservation
- American Society of Landscape Architects
- Anacostia Historical Society
- Area Neighborhood Commissions 8A, 8B, 8C, 8D, and 8E
- Brookings Institute
- Committee of 100 on the Federal City
- Cultural Landscape Foundation
- DC Preservation League
- Department of Homeland Security
- District of Columbia Department of Transportation
- District of Columbia Office of Planning
- District of Columbia State Historic Preservation Office
- Federal Highway Administration
- Friends of St. Elizabeths
- Medical & Professional Society of St. Elizabeths Hospital
- National Association for Olmsted Parks
- National Capital Planning Commission
- National Coalition to Save Our Mall
- National Historic Landmarks Stewards Association
- National Museum of Civil War Medicine
- National Park Service
- National Trust for Historic Preservation
- Office of Councilmember Marion Barry
- Representative Eleanor Holmes Norton
- St. Elizabeths Hospital
- U.S. Coast Guard
- U.S. Commission of Fine Arts

In connection with its redevelopment of the St. Elizabeths Campus, GSA has been consulting with various stakeholder agencies and organizations pursuant to NHPA Sections 106 and 110(f) since 2005. The consultation resulted in a Programmatic Agreement (PA) in accordance with regulations promulgated by the Advisory Council on Historic Preservation (ACHP). A PA is authorized by ACHP regulations to resolve adverse effects stemming from certain complex project situations (36 C.F.R. § 800.14(b)). Under the regulations, a PA is appropriate when “effects on historic properties cannot be fully determined prior to approval of an undertaking” (36 C.F.R. § 800.14(b)(1)(ii)).

GSA has entered into a Memorandum of Agreement (MOA) with the ACHP, the District of Columbia Historic Preservation Office (DC HPO), FHWA, NCPC, and DHS to ensure continued compliance with NHPA whereby GSA will conduct consultations for each phase of development and minimize harm to the maximum extent possible while satisfying the programmatic requirements. A separate MOA addressing the Section 106 process for the West Campus Access Road and Firth Sterling Avenue is being developed concurrent with this ROD Addendum.

GSA met with the Consulting Parties in October and November 2010 and again in June and September 2011 to discuss design refinements to the Firth Sterling Avenue intersection with the West Campus Access Road.

4. Environmentally Preferable Alternative

The environmentally preferable alternative is the transportation improvement alternative or no action alternative that would present the least impact on the natural and social environment. The environmentally preferable alternative for this action varies depending on the resource area considered. **Table 2** presents the environmentally preferable alternative by resource area as identified by NEPA analyses.

Table 2. Environmentally Preferable Alternative by Resource Area

Resource Area	Environmentally Preferable Alternative
Cultural Resources	No Action Alternative or Preferred Alternative
Natural Resources	Preferred Alternative
Social and Economic Resources	No Action Alternative
Air Quality	No Action Alternative or Preferred Alternative
Noise	No Action Alternative
Transportation	Preferred Alternative
Utilities	Preferred Alternative
Environmental Contamination	No Action Alternative or Preferred Alternative

5. Environmental Consequences of the Preferred Alternative

Potential environmental consequences that have been identified by resource area from implementing the Preferred Alternative are shown in **Table 3**.

Table 3. Summary of Impacts from Implementing the Preferred Alternative

Resource Area	Impacts from Firth Sterling Avenue/West Campus Access Road Improvement	Change in Impacts From 2008 Final EIS and ROD?
Cultural Resources		
Cultural Resources	Long-term, major, adverse impacts on cultural landscape features from retaining walls constructed along the West Campus Access Road would negatively impact views of the campus when approaching from both the north and south.	No change.
Natural Resources		
Geology, Topography, and Soils	Short- and long-term, negligible impacts from soil disturbance, erosion, and sedimentation.	Yes; impacts identified in 2008 Final EIS and ROD were long-term, moderate, adverse.
Groundwater Hydrology and Quality	Long-term, negligible impacts from a reduction in groundwater recharge.	Yes; impacts identified in 2008 Final EIS and ROD were long-term, minor, adverse.
Surface Water	Short-term, minor, adverse impacts from degraded water quality. Long-term, moderate, adverse impacts from filling of streams.	No change.
Wetlands	Short- and long-term, negligible to minor, adverse impacts for both alternatives due to increased soil erosion and sedimentation and hydrologic changes.	No change.
Terrestrial Biota (Vegetation and Wildlife)	Long-term, negligible impacts from vegetation removal. Short- and long-term, negligible impacts on wildlife from noise and human activity.	No change.
Aquatic Biota	Short- and long-term, minor, adverse impacts from degraded water quality and increased storm water runoff.	No change.
Protected Species	No impacts.	No change.
Social and Economic Resources		
Land Use Planning and Zoning	No impacts.	No change.
Population and Housing	Short-term, negligible to minor, adverse impacts during construction.	Yes; impacts identified in 2008 Final EIS and ROD were long-term, negligible, adverse.
Environmental Justice	Long-term, negligible to minor, adverse impacts from slight encroachment on residential land uses, such as the Barry Farm neighborhood.	Yes; the 2008 Final EIS and ROD identified no anticipated impacts.

Resource Area	Impacts from Firth Sterling Avenue/West Campus Access Road Improvement	Change in Impacts From 2008 Final EIS and ROD?
Social and Economic Resources (continued)		
Economy, Employment, and Income	Short- and long-term, minor, beneficial impacts as result of demand for labor and increases in employment and retail opportunities.	No change.
Taxes and Revenue	No impacts.	No change.
Community Services	Long-term, minor, adverse impacts on police, fire, and rescue services from additional traffic.	No change.
Community Facilities	Long-term, minor, beneficial impacts from traffic improvements providing increased access.	No change.
Air Quality		
Air Quality	Short- and long-term, minor, adverse impacts during construction and operations.	No change.
Noise		
Noise	Long-term, minor, adverse impacts during construction and operations.	Yes; impacts identified in 2008 Final EIS and ROD were long-term, negligible, adverse.
Transportation		
Transportation	Long-term, moderate, adverse impacts from decreased traffic flow.	Yes; impacts identified in 2008 Final EIS and ROD were long-term, major, adverse.
Utilities		
Utilities	Short-term, negligible to minor, adverse impacts could occur with temporary utility service loss. Short-term, moderate and long-term, minor impacts on storm water management.	Yes; impacts identified in 2008 Final EIS and ROD were short-term, minor to moderate and long-term, moderate, adverse.
Environmental Contamination		
Environmental Contamination	No impacts.	No change.

6. Mitigation Measures Related to the Preferred Alternative

Mitigation measures for potential impacts associated with the construction of the West Campus Access Road from Gate 4 to its intersection with Firth Sterling Avenue are divided into general mitigation measures, mitigation measures for cultural resources, and detailed erosion and storm water mitigation measures identified to date for the Preferred Alternative through mitigation planning.

General Mitigation Measures

The Preferred Alternative has been developed to mitigate transportation impacts associated with the DHS Headquarters consolidation at St. Elizabeths. In addition, the following mitigation measures would further reduce impacts on transportation from DHS development of the St. Elizabeths Campus:

- Reduce retaining wall heights to the maximum extent feasible by grading or creating a profile difference between the roadway, bus bays, and multi-purpose trail.
- Erosion-and-sediment-control measures such as silt fencing, erosion-control matting, and earth or hay berms would be implemented.
- Seed would be applied to all areas where soil is exposed.
- The tall, dense, vegetation that would be removed in proximity to the West Campus Access Road would be replaced with shorter vegetation to prevent soil erosion.
- Infiltration devices would be used to capture storm water runoff from increased impervious surfaces and divert it to the subsurface. Such devices must be located at sites capable of percolating the water from the surface to the subsurface and be designed in compliance with applicable storm water management regulations. Soils at potential infiltration device locations must be tested for their ability to accept water.
- Areas that are not to be developed should not be used for equipment parking and other construction-related activities unless they are designated as construction staging areas or access roads.
- For vegetation impacts, mitigation measures include potential removal of nonnative vegetation species and landscaping of newly developed areas with native vegetation.
- All activities would fully comply with District of Columbia noise regulations.
- Storm water management techniques to mitigate for impacts from transportation would include implementing best management practices during construction efforts such as installing silt fencing. A Spill Prevention, Control, and Countermeasures Plan would be developed or maintained and followed to minimize the impact of any construction equipment leaks or spills. A range of additional measures to collect, store, and treat

storm water runoff would be investigated and considered to minimize the footprint and impact of storm water management infrastructure, including vegetated buffers along roadways to increase rates of runoff infiltration and decrease sheet flow.

Mitigation Measures for Cultural Resources

In addition to the general mitigation measures, specific mitigation measures were identified in the 2008 PA on the redevelopment of St. Elizabeths to address potential adverse effects on the St. Elizabeths Hospital National Historic Landmark (NHL). The mitigation measures include the following with respect to the West Campus Access Road:

- As ground-disturbing activities would occur within the project area, GSA would conduct investigations to determine whether archaeological resources are present. GSA would provide DC HPO with an opportunity to review and comment on the findings of the investigation. If it is determined that areas within the project area have the potential for intact archaeological resources, GSA would consult with DC HPO on measures to investigate such areas. Further, if NRHP-eligible archaeological resources are found, GSA would consult with DC HPO on measures to avoid, minimize, or mitigate adverse impacts associated with undertaking the project.
- Lower the profile of the roadway improvements to more closely match existing topography.

Erosion and Storm Water Mitigation Measures for the Preferred Alternative

- Silt fence, super silt fence, stabilized construction entrance with wheel wash, and inlet protection would be used in the project area.
- For sediment-control purposes, phasing would be used to allow for the initial construction of a new storm drain trunk extension from the existing storm drain to allow existing ditches to be filled in the project area.
- All erosion and sediment control measures would be installed prior to the start of any excavation or construction activities per standards and specifications for soil erosion and sediment control for the District of Columbia.
- All debris would be removed from the site, and alleys or streets would be swept clean during excavation and construction.
- Catch basins or drains in the project area would be maintained to prevent clogging.
- Sediment traps/sediment tanks would be cleaned once 67 percent capacity of the trap/tank has been reached.
- The West Campus Access Road and multi-purpose trail would be stabilized with permanent pavement with storm water collection at new catch basins that drain to the

new trunk storm sewer. Graded areas outside of the roadway to the pedestrian path would be stabilized with permanent seeding.

- A new storm water drain connects to existing separate DC Water storm sewer systems, which has adequate capacity to carry 15-year storm event flows to the Anacostia River.
- Storm water bioretention filtration systems would be used to retain the first flush prior to reaching storm drain inlets.
- Low-impact storm water management practices would be considered, including bioswales, permeable pavements, street trees, and vegetated filter strips, as suggested in the DDOT publication *Anacostia Watershed Initiative: Transportation Architecture Design Guidelines*.

7. Other Requirements and Commitments

7.1 Section 106 Consultation Process and Programmatic Agreement

GSA, the DC HPO, ACHP, NCPC, FHWA, and DHS have executed a PA (identified in **Section 3.3**) that identifies steps that will be taken to avoid, minimize, or mitigate adverse impacts on historic resources from DHS consolidation at St. Elizabeths, including the West Campus Access Road. The PA outlines the process to implement the DHS Master Plan at St. Elizabeths, references the design and landscape guidelines, includes mitigation commitments, and outlines the process by which specific projects at St. Elizabeths will be reviewed to ensure ongoing compliance with Sections 106 and 110 of the NHPA. This is a separate ongoing process from this ROD Addendum and will continue to ensure mitigation and minimization measures are implemented, including those identified in **Section 6**.

7.2 District of Columbia Approval

The proposed new intersection of the West Campus Access Road with Firth Sterling Avenue, including new traffic signals, would be reviewed and approved by DDOT prior to construction and are subject to modification based on DDOT comments during the review and approval process. DDOT would assume maintenance responsibilities of the Firth Sterling Avenue intersection and associated roads outside of the St. Elizabeths Campus once construction activities are completed. The District of Columbia Department of Environment and DC Water would also approve designs for the transportation improvements prior to the initiation of construction activities.

7.3 NEPA Analysis for East Campus Development and other Transportation Improvements

GSA is currently preparing a Master Plan Amendment EIS for the DHS development on the East Campus and reevaluation of all transportation improvements associated with DHS consolidation. The Final Master Plan Amendment EIS is scheduled to be completed, with a signed ROD, by

spring 2012. However, immediate approval of the actions described in this ROD Addendum is required due to the DHS Headquarters construction project schedule, including occupancy of space by the Coast Guard starting in May 2013.

7.4 NCPC and CFA Approval

Under 40 United States Code (U.S.C.) § 8722, NCPC has approval authority over site and building designs for Federal public buildings in the District of Columbia and consults NCPC-approved Master Plans as the basis for subsequent reviews and approvals. GSA will submit the West Campus Access Road design to NCPC for approval.

The CFA is an independent agency that advises the Federal and District of Columbia governments on matters of design and aesthetics that affect the appearance of the NCR. Under 45 Code of Federal Regulations (CFR) § 2101.1(a), CFA comments and advises on the plans and on the merits of the designs for public buildings to be erected in the District of Columbia by the Federal Government before final approval or action. CFA will review the West Campus Access Road design.

7.5 Implementation

The schedule for the proposed West Campus Access Road and intersection with Firth Sterling Avenue is as follows:

- Executed MOA regarding historic preservation of the West Campus Access Road: September 2011
- NCPC Final Design Submission: September 2011
- CFA Final Design Submission: October 2011
- NCPC Approval: November 2011
- Commencement of construction of the West Campus Access Road: November 2011
- Commencement of construction of the Firth Sterling Avenue/West Campus Access Road intersection: September 2012
- Completion of the West Campus Access Road and intersection with Firth Sterling Avenue: May 2013.

8. Decision

As Regional Administrator of GSA, NCR, and in support of DHS, it is my decision to approve this Addendum to the 2008 ROD and thereby implement the Preferred Alternative of the West Campus Access Road from Gate 4 to its intersection with Firth Sterling Avenue. This action is necessary as part of the redevelopment of the St. Elizabeths Campus associated with consolidating DHS headquarters. The Preferred Alternative includes intersection improvements

along Firth Sterling Avenue resulting in a left-turn lane onto the West Campus Access Road, and construction of approximately 10 bus bays along the West Campus Access Road.

The selection of the Preferred Alternative for the West Campus Access Road from Gate 4 to its intersection with Firth Sterling Avenue is conditioned on the following:

- Approval of the design for the West Campus Access Road by NCPC.
- Successful execution of the MOA regarding historic preservation signed by GSA, DC HPO, ACHP, FHWA, NCPC, and DHS in September 2011.
- Subsequent final determinations by DDOT on the Firth Sterling Avenue intersection with the West Campus Access Road. The Preferred Alternative could be implemented immediately after approval by DDOT.

Development of the West Campus Access Road will be guided by the Overall Development Phasing schedule included in the Master Plan Amendment and the PA.

This ROD Addendum documents the specific components of my decision and the rationale for my decision. This decision is based on information and analyses contained in the following:

- 2008 Final Master Plan EIS and ROD
- 2010 Draft Master Plan Amendment EIS
- 2010 St. Elizabeths Transportation Technical Report
- Comments from Federal and state agencies, stakeholder organizations, members of the public, elected officials, and other information in the project administrative record.

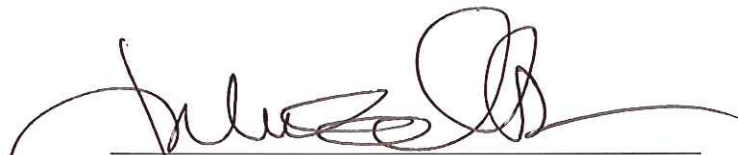
The proposed transportation improvements under the Preferred Alternative in this ROD Addendum, namely the West Campus Access Road from Gate 4 to Firth Sterling Avenue, do not conflict with the conclusions presented in the 2008 Final Master Plan EIS and ROD. Selection of the Preferred Alternative for the West Campus Access Road does not constitute an irretrievable commitment of resources prohibited under NEPA.

9. Rationale for Decision


The decision to implement the Preferred Alternative for the West Campus Access Road is based on a balancing of likely adverse impacts on the NHL with the pressing national security need for DHS to consolidate its headquarters at a single secure site in the NCR and provide the appropriate level of transportation improvements. This decision takes into account resource concerns, DHS' national security mission and program, and public interests as analyzed in past and ongoing NEPA documentation. I reached my 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 DHS and the community.

Extensive evaluation of the improvements to Firth Sterling Avenue to accommodate an intersection with the West Campus Access Road, both in a regional and local context, and in coordination with DDOT regarding this intersection has led to my decision that, as the result of such evaluation and coordination, the Preferred Alternative for the West Campus Access Road is the best course of action. The Preferred Alternative also would minimize impacts on major arteries and local streets, such as in the Barry Farm neighborhood, while meeting the requirements for DHS access to the St. Elizabeths Campus. The reconfiguration of bus bays along the West Campus Access Road maximizes alighting and boarding opportunities for DHS employees and supports DHS' Transportation Management Plan while minimizing impacts on the NHL to the extent practicable. Because the No Action Alternative and alternatives in the TTR for the West Campus Access Road impose slightly greater harm on the natural and social environment, I have chosen the Preferred Alternative for the West Campus Access Road from Gate 4 to Firth Sterling Avenue in an effort to minimize that harm to the greatest extent possible while meeting DHS Headquarters consolidation needs. GSA will impose mitigation measures as identified in **Section 6** during construction and operations to further reduce those impacts.

My decision is based on coordination and consultation with DDOT. Although GSA has selected a Preferred Alternative that includes implementation of improvements to the Firth Sterling Avenue intersection, it is a public facility under DDOT's jurisdiction, and as such, the final design will be coordinated with DDOT for their approval. DDOT will also assume maintenance responsibilities of the Firth Sterling Avenue intersection and its associated improvements outside of the St. Elizabeths Campus upon completion of construction activities.



Julia E. Hudson
Regional Administrator
General Services Administration
National Capital Region



Date