

### 5.2.3 Biological Resources

The following sections describe the environmental consequences for biological resources under both the No-action Alternative at Greenbelt and the Greenbelt Alternative.

#### BIOLOGICAL RESOURCES ASSESSMENT OF SIGNIFICANCE

Impacts to biological resources would not result in significant impacts, as defined in section 3.4.3.

#### 5.2.3.1 Vegetation

##### No-action Alternative

Under the No-action Alternative at the Greenbelt site, vegetation loss would occur for portions of the riparian forest along the existing easterly limits of disturbance that would be incorporated into the mixed-use development footprint. The precise magnitude of vegetation loss is unknown at this time and is dependent on a final design. Although some existing vegetation would be lost, the mixed-use development would reintroduce small areas of vegetation in the form of street trees, lawns, and other landscaped areas. Therefore, there would be no measurable impacts to vegetation under the No-action Alternative at Greenbelt.

##### Greenbelt Alternative

Under the Greenbelt Alternative, there would be no measurable short-term impacts. Over the long term, the operation of a consolidated FBI HQ campus would result in permanent clearing of approximately 2 acres of existing vegetation adjacent to the currently paved portion of the site. The vegetation removed would mostly consist of grasses, shrubs, and saplings; however, clearing of full grown trees may be required depending on final design requirements. It is assumed that this portion of the site would remain vegetated with grasses; however, there is the potential for impervious surface associated with a drivable perimeter to be implemented. Over the long term, vegetation, including

trees, shrubs, and grasses, would be reintroduced to portions of the previously disturbed and currently impervious portion of the site. This change would result in a net increase in vegetation quality and quantity, and lead to direct, long-term, beneficial impacts to vegetation.

##### Transportation Mitigations

Construction along approximately 4,300 linear feet of roadways requiring substantial widening, including along Edmonston Road and Powder Mill Road as shown in figure 5-47, would have the potential to adversely impact vegetation. These impacts would involve the removal of grasses and some trees along the sides of roadways, which would remove forested habitat. The potential impacts in these areas would be minimized because construction would occur within previously disturbed areas adjacent to existing roadways. Therefore, impacts to vegetation associated with traffic mitigation measures would be direct, long-term, and adverse.

#### 5.2.3.2 Aquatic Species

##### No-action Alternative

Under the No-action Alternative at the Greenbelt site, there could be indirect, short- and long-term, adverse impacts to aquatic species. Construction activities may degrade water quality due to sediment and pollution loading; however these impacts would be minimized to the extent they are not measurable by compliance with applicable permits, as described for water resources in section 5.2.2. Over the long term, the mixed-use development may encroach on wetlands and stream resources, resulting in the loss of usable habitat. The magnitude of any indirect, long-term, adverse impact would depend on the final design of the mixed-use development, and is not measurable at this time.

##### Greenbelt Alternative

Under the Greenbelt Alternative, construction activities would directly impact aquatic species in the same manner as they would under the No-action Alternative, resulting in no measurable short-term impacts. Over the long term, there would be minimal encroachment into the Indian Creek riparian area. The decrease in stormwater runoff quantity and increase in stormwater quality, as described in section 5.2.2 would result in beneficial impacts to aquatic species. Nontidal wetland resources and segments of the stream channel would be preserved in their current state, outside the site's secure perimeter. Indian Creek and the smaller headwater streams in the vicinity of the Greenbelt site are designated as Use I streams (Water Contact Recreation and Protection of Nontidal Warmwater Aquatic Life) (Anacostia Watershed Restoration Partnership 2010). Correspondence received from MDDNR during agency scoping for this project indicates that aquatic species would be protected by the spring/summer instream work restriction period, stringent sediment and erosion control methods, and other BMPs typically used for protection of stream resources.

##### Transportation Mitigations

Construction along approximately 4,300 linear feet of roadways requiring substantial widening, including along Edmonston Road and Powder Mill Road as shown in figure 5-47, would have the potential to adversely impact aquatic habitats associated with Indian Creek and Beaverdam Creek. These adverse impacts would be caused by sediment and pollutant loading in stormwater runoff from temporarily exposed soils, which would contribute to a decline in water quality. It is anticipated that sediment and erosion control methods and other BMPs typically used to control stormwater quality during transportation construction projects would minimize any potential impacts to aquatic species during roadway construction activities.

#### GREENBELT VEGETATION ENVIRONMENTAL CONSEQUENCES SUMMARY

-  **No-action Alternative:** No measurable impacts.
-  **Greenbelt Alternative:** Direct, long-term, beneficial and adverse impacts.

#### GREENBELT AQUATIC SPECIES ENVIRONMENTAL CONSEQUENCES SUMMARY

-  **No-action Alternative:** No measurable impacts.
-  **Greenbelt Alternative:** Direct, long-term, beneficial impacts.

### GREENBELT TERRESTRIAL SPECIES ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** Indirect, short-term, adverse impacts.

**Greenbelt Alternative:** Direct, long-term, adverse impacts.

### GREENBELT SPECIAL STATUS SPECIES ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** Indirect, short-term, adverse impacts to avian species of conservation concern.

**Greenbelt Alternative:** Direct, long-term, adverse impacts.

### FULL CUT-OFF

A light system that prevents light from being cast upward or outward and therefore contributing to light pollution. No light is emitted directly from the luminaire into the sky.

### 5.2.3.3 Terrestrial Species

#### No-action Alternative

Under the No-action Alternative at the Greenbelt site, no measurable long-term impacts would occur because the mixed-use development would not noticeably alter the amount or quality of existing habitat. During construction, noise created by construction vehicles and equipment and other human activity would cause wildlife to temporarily vacate the small amount of existing habitat within the already disturbed portion of the site, and move to adjacent areas to forage. Mortality or injury of some smaller, less mobile, species could occur as a result of construction activities. Once construction is complete, wildlife would likely return to the area. Therefore, under the No-action Alternative, there would be indirect, short-term, adverse impacts to terrestrial species.

#### Greenbelt Alternative

Under the Greenbelt Alternative, construction activities would impact terrestrial species in the same manner as they would under the No-action Alternative, resulting in no measurable short-term impacts. Over the long term, impacts to terrestrial wildlife at the Greenbelt site would occur as a result of the loss of approximately 2 acres of usable habitat adjacent to the current easterly extent of disturbance; however, this loss would be made up by the reintroduction of vegetated and landscaped areas within the previously disturbed portion of the site. The implementation of security fencing would separate habitat within the Indian Creek corridor from other landscaped and vegetated areas, and any lighting along the secure perimeter could introduce light pollution to habitat not previously impacted. Additional light associated with the buildings and landscaping elements could also have adverse effects on nocturnal species. Nocturnal species would move away from the site and may be displaced because of a lack of available habitat. However, these direct adverse impacts to terrestrial wildlife would be minimal because of the relatively small area being affected and because there are other areas within the Indian Creek corridor where displaced species could move that would provide adequate habitat. Wildlife typically found near urban

areas are accustomed to disturbances and other noises created by moving vehicles and other human activity. In summary, impacts to terrestrial species at the Greenbelt site would be direct, long-term, and adverse.

#### Transportation Mitigations

Construction along approximately 4,300 linear feet of roadways requiring substantial widening, including along Edmonston Road and Powder Mill Road as shown in figure 5-47, would have the potential to adversely impact terrestrial species through loss of habitat. The potential impacts in these areas would be minimized because construction would occur within previously disturbed areas adjacent to existing roadways in areas already experiencing light and noise pollution and increased levels of human activity. Therefore, there would be direct, long-term, adverse impacts to terrestrial species from the conversion of forest habitat to roadway.

### 5.2.3.4 Special Status Species

#### No-action Alternative

Under the No-action Alternative at the Greenbelt site, there would be no measurable long-term impacts to federally and state-listed wildlife species at the Greenbelt site because no Federally or state-listed wildlife species are present on the Greenbelt site.

The one state-listed plant species in the area, trailing stitchwort (*Stellaria alsine*), is known to occur in the floodplain of Indian Creek adjacent to the Greenbelt site (MDDNR 2015d). While there would be no measurable long-term impacts to this species from loss of habitat, this species could be indirectly impacted by runoff from the mixed-use development. It is anticipated that sediment and erosion control methods, as well as other BMPs typically used to control stormwater quality, would mitigate any potential impacts to trailing stitchwort during construction activities at the site to the extent they would not be measurable.

Due to the presence of natural habitat, there is a likelihood that species of migratory birds of conservation concern may be present at the site year-round, in transit, for breeding, or for wintering purposes. Displacement to year-round or wintering avian species would temporarily increase as a result of increased human activity and noise associated with construction on-site, resulting in indirect, short-term, adverse impacts. These impacts to birds of conservation concern would be minimal because of the relatively small area being affected and because there are other areas adjacent to the site where displaced individuals could move. Over the long term, the increased lighting of the mixed-use development may interfere with migratory birds' instinctive behavior that assists them in migrating (Florida Atlantic University n.d.), however the use of full cut-offs would minimize this impact.

#### Greenbelt Alternative

Under the Greenbelt Alternative, there would be no measurable impacts to federally and state-listed wildlife species at the Greenbelt site because no federally or state-listed wildlife species are present on the Greenbelt site (USFWS 2014a). Under the Greenbelt Alternative, construction activities would impact state listed species in the same manner as they would under the No-action Alternative, resulting in no measurable short-term impacts. Environmentally sensitive design and building elements incorporated into the project to control stormwater quantity and quality would mitigate any potential long-term impacts to state-listed plant species caused by changes in water quality.

Construction activities would impact birds of migratory concern in the same manner as they would under the No-action Alternative, resulting in no measurable short-term impacts. However there would be direct, long-term, adverse impacts as a result increased lighting of the site, especially lighting along the perimeter fence, which would interfere with migratory birds' instinctive behavior, which assists them in migrating (Florida Atlantic University n.d.), however the use of full cut-offs would minimize the potential for this impact.

### Transportation Mitigations

Construction along approximately 4,300 linear feet of roadways requiring substantial widening, including along Edmonston Road and Powder Mill Road as shown in figure 5-47, would have the potential to adversely impact the habitat of special status species due to increased noise and human activities during construction. The potential impacts in these areas would be minimized because construction would occur within previously disturbed areas adjacent to existing roadways, in areas already experiencing light and noise pollution and high levels of human activity. Over the long term, there would be adverse impacts to terrestrial species from the conversion of forest habitat to roadway. Therefore, impacts to terrestrial species associated with traffic mitigation measures would be direct, long- and short-term, and adverse.

## 5.2.4 Land Use, Planning Studies, and Zoning

The following sections describe the environmental consequences for land use and zoning resources under both the No-action Alternative at Greenbelt and the Greenbelt Alternative.

### LAND USE, PLANNING STUDIES, AND ZONING ASSESSMENT OF SIGNIFICANCE

Impacts to land use and zoning would not result in significant impacts, as defined in section 3.5.3.

#### 5.2.4.1 No-action Alternative

Under the No-action Alternative at the Greenbelt site, the mixed-use development would align with the land use zoning designations for the site and therefore there would be no measurable impacts. Likewise, property takings required to implement the proposed road improvements would occur on land currently owned by WMATA, who has signed a Joint Development Agreement with the mixed-use developer, so there would be no measurable impacts to land use as a result of property takings required to implement the transportation mitigations.

### Regional and Local Land Use Studies

Under the No-action Alternative at the Greenbelt site, the Greenbelt site would be transformed into a mixed-use development that would largely align with the regional land use plans and studies for the Greenbelt area. As a result, there would be indirect, long-term, beneficial impacts from the mixed-use development that achieves local and regional land use goals. However, there would be a few notable indirect, long-term, adverse impacts where the proposed mixed-use development would not meet the goals and visions of these plans. Both Plan Prince George's 2035 and the Greenbelt Metro Area Sector Plan and SMA specifically envision the incorporation of a GSA campus or consolidated FBI HQ at this site. Furthermore, the increase in density at this site would not preserve existing rural or agricultural viewsheds associated with BARC, as the buildings on this site would likely be visible in the southern portions of this agricultural land.

#### 5.2.4.2 Greenbelt Alternative

### Zoning

The entirety of the site is zoned D-D-O, which is intended to ensure that development meets the goals established in the relevant sector plan. The northwest portion of the site, owned by WMATA, is zoned as M-X-T, which mandates that at least two of the following categories must be present on the site (1) retail businesses; (2) office/research/industrial; (3) dwellings, hotel/motel. The Greenbelt Alternative would satisfy only the office use category. However, the FBI HQ would be adjacent to additional mixed-use development that would be constructed on a portion of the same parcel, and this development would satisfy all three categories. Therefore, although the Greenbelt Alternative does not comply with M-X-T zoning requirements, additional mixed-use development on the site would mitigate zoning impacts. Development on a federally controlled site is not subject to zoning; however, GSA and the exchange partner would cooperate with state and local officials through the development process to ensure compatibility with surrounding development. Therefore, under the Greenbelt Alternative, there would be no measurable impacts to zoning.

### Transportation Mitigation

The recommended transportation mitigations would result in property takings that would alter land use along roadways recommended for improvement to mitigate traffic impacts in the study area, as shown in figure 5-47. The proposed recommended mitigation measures may require property strip takings at two intersections: Edmonston Road at Sunnyside Avenue and Edmonston Road and Powder Mill Road. The Edmonston Road and Sunnyside Avenue intersection mitigation measures would impact the northbound direction beginning 450 feet south of the intersection and continuing 2,950 feet north leading into the intersection at Powder Mill Road. Measures would also include a new lane added to the southbound direction beginning 600 feet north of the intersection and continuing 2,100 feet south.

The Edmonston Road at Powder Mill Road mitigation measures would impact the northbound approach and westbound departing segments. The northbound approach impact would include 400 feet as part of second left-turn lane, and the westbound departing segment would include a 200-foot stretch where the County ROW ownership line narrows bordering on the edge of the existing pavement.

The vast majority of property takings required to accommodate these road improvements would impact land currently owned by the Federal Government and associated with BARC. However, there are four privately owned residential parcels, located on the west side of Edmonston Road at Beaver Dam Road that may be impacted. These potential impacts are based on conceptual roadway changes. During the design phase, the property impacts would be refined to minimize property takings and use design measures that could be lessen the impact, such as narrowing travel lanes or shifting the roadway alignment.

### GREENBELT LAND USE ENVIRONMENTAL CONSEQUENCES SUMMARY



**No-action Alternative:** Indirect, long-term, beneficial and adverse impacts.



**Greenbelt Alternative:** Direct, long-term, adverse and beneficial impacts.

### GREENBELT ZONING ENVIRONMENTAL CONSEQUENCES SUMMARY



**No-action Alternative:** No measurable impacts.



**Greenbelt Alternative:** No measurable impacts.

## Regional and Local Land Use Studies

### *Plan Prince George's 2035*

Plan Prince George's 2035 provides guidance for Prince George's County and designates Greenbelt as one of the eight Regional Transit Centers. The Greenbelt Alternative would contribute to Plan Prince George's 2035 by promoting development in the Regional Transit Centers, as a potential driver of economic growth and Federal employment hub, strengthening the value of the neighborhood, and transforming Greenbelt into a viable economic engine with a range of transportation options. As a result, there would be a direct, long-term, beneficial impact to land use in Greenbelt.

While the Greenbelt site would promote viable, economically beneficial land uses, it would not align with specific aspects of the Plan Prince George's 2035. According to the plan, development should promote higher-density, compact, mixed-use development; preserve existing rural or agricultural communities and viewsheds; and promote walkable communities. A consolidated FBI HQ would be restricted to one use as a government campus, and the setback requirements would limit compact development. As a result, the layout of the FBI HQ would contradict Plan Prince George's 2035 goals of creating a compact walkable community with a mix of uses. In addition, the construction of the FBI HQ, with a height of approximately 225 feet (17 stories), could encroach upon efforts to protect the agricultural viewshed associated with BARC north and west of the site. As a result of the misalignment with these aspects of Plan Prince George's 2035, there would be a direct, long-term, adverse impact to land use in Greenbelt.

Consolidating FBI HQ at the Greenbelt site would satisfy aspects of Plan Prince George's 2035 by promoting economic development and strengthening the value of the neighborhood surrounding the Greenbelt Metro Station resulting in direct, beneficial impacts. However, these beneficial impacts would occur with the caveat that this site would not facilitate beneficial public space, mixed-use, compact development, or preserve existing rural or agricultural viewsheds, which would result in long-term, adverse impacts.

### *Approved Greenbelt Metro Area and MD 193 Corridor Sector Plan and Sectional Map Amendment*

The construction of the FBI HQ at the Greenbelt site would both align and contradict with the goals outlined by the Greenbelt Sector Plan and SMA, hereafter referred to as the Greenbelt Sector Plan. A consolidated FBI HQ would foster a multi-modal transportation-oriented community by centralizing development in close proximity to multiple bus routes and the Greenbelt Metro Station. The construction would also align with the goals of the Greenbelt Sector Plan by maintaining a network of natural areas by protecting the wetlands and Indian Creek south of the site. Other objectives of the Greenbelt site that would coincide with the Greenbelt Sector Plan would include providing a state of the art physical infrastructure network to complement the Greenbelt Metro Station; promoting successful, regionally competitive office parks; and helping to maximize the economic potential of the Greenbelt Metro Station vicinity. In addition, the FBI HQ would align with the goals of the Greenbelt Sector Plan for environmental infrastructure because the infrastructure that would be used for the FBI HQ would be LEED Gold Certified. Lastly, the plan sector plan specifically encourages the location of a major employer or GSA employment campus that would include supporting office, retail, and residential uses. As a result of the alignment with the goals outlined in the Greenbelt Sector Plan, consolidation of the FBI HQ at the Greenbelt site would result in direct, long-term, beneficial impacts to land use.

The Greenbelt Alternative would be inconsistent with the Greenbelt Sector Plan in a similar fashion to the contradictions referenced in Plan Prince George's 2035. The FBI HQ would discourage a walkable, pedestrian-friendly, mixed-use downtown and would not provide successful connections or relationships with the surrounding area. These discrepancies would be attributed to the consolidated FBI HQ's single use, building setback requirements, and ultimate lack of compact development and pedestrian friendly design. Because of these disagreements between the effects of the implementation of the FBI HQ and the goals outlined in the Greenbelt Sector Plan, there would be direct, long-term, adverse impacts to land use in Greenbelt.

### *City of Greenbelt Pedestrian and Bicyclist Master Plan*

The discrepancies between the construction of the FBI HQ at the Greenbelt site and the City of Greenbelt Pedestrian and Bicyclist Master Plan would be similar to those noted for both Plan Prince George's 2035 and the Greenbelt Sector Plan. There would be long-term, adverse impacts to land use resulting from the lack of pedestrian connections between the consolidated FBI HQ at the Greenbelt site. However, there would be no measurable impacts to the overall city's goals of fostering bicycle friendly development and access.

*Comprehensive Plan for the National Capital Region*

The Greenbelt Alternative would align with the Comprehensive Plan for the NCR by fulfilling several objectives of the plan. As stated in the Comprehensive Plan, development of new facilities should afford the Federal Government the opportunity to locate new workplaces where improvements in operational efficiencies can be made while it uses existing resources, promotes the use of alternative transportation, and enhances interactions with local communities to address regional and local problems.

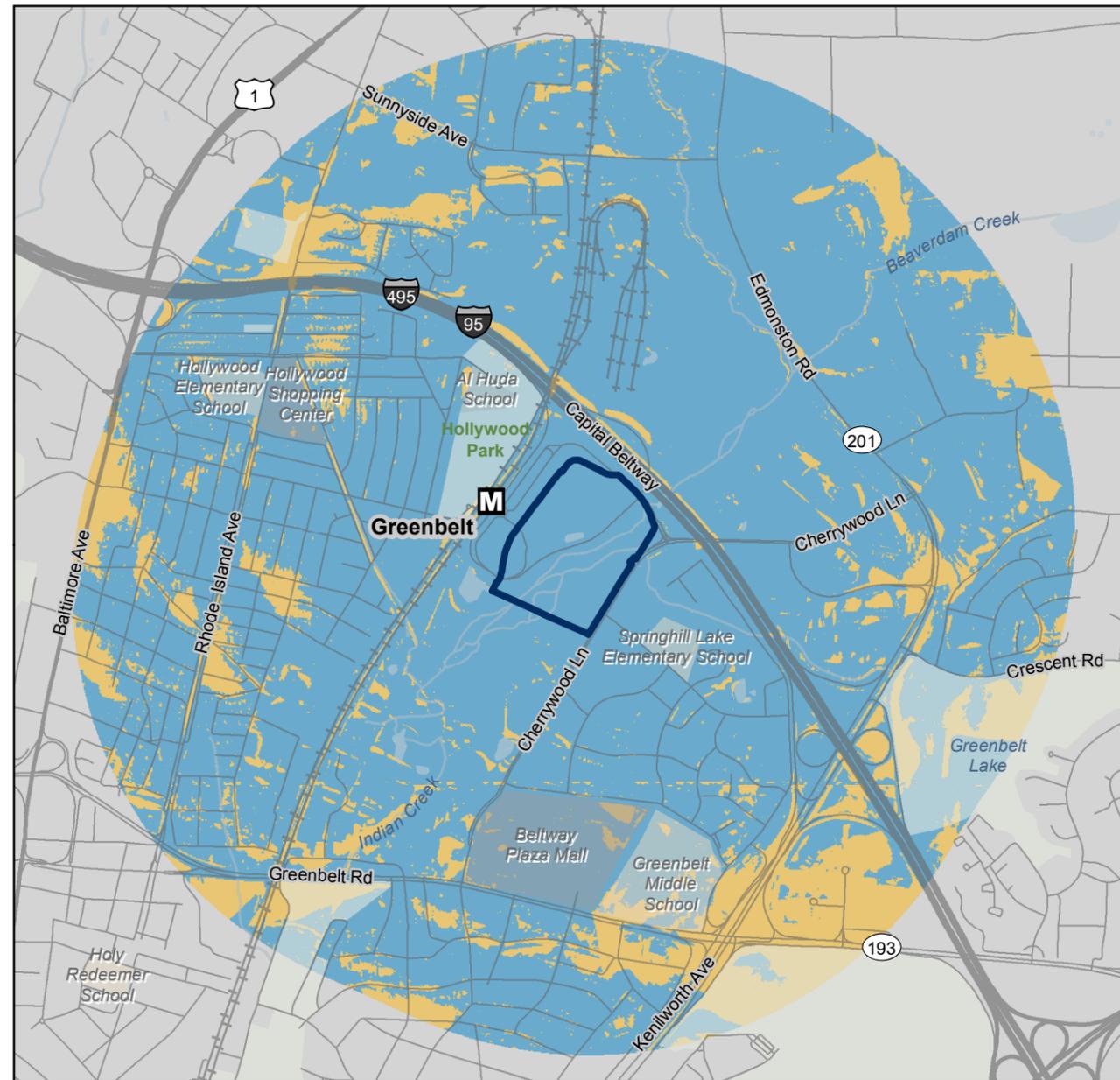
The Greenbelt Alternative would enhance operational efficiencies, promote multi-modal transportation via proximity to the Greenbelt Metro Station and multiple bus routes, and contribute to developing the economy in Greenbelt. Other policies that are outlined in the Comprehensive Plan for the NCR regarding locating Federal workplaces include:

- giving preference to urban areas;
- locating Federal facilities within walking distance of existing or planned fixed guideway transit services;
- locating Federal workplaces in areas where efficiencies are gained through proximity to a market of private suppliers of goods and services; and
- supporting regional and local agency efforts to coordinate land use with the availability or development of transportation alternatives to the private automobile, including walking, bicycle riding, and public transit.

As a result of the Greenbelt Alternative, there would be direct, long-term, beneficial impacts to land use with respect to the Comprehensive Plan for the NCR. The Greenbelt site satisfies the guidelines for site location with regard to proximity to transit (the Greenbelt Metro Station), proximity to a market of private suppliers of goods and services (City of Greenbelt), and a contribution to coordinating land use with the development of transportation alternatives to the private automobile.

Consolidation of the FBI HQ would not align with the Comprehensive Plan for the NCR because it would not utilize underdeveloped Federal sites or available space in Federal buildings as recommended in the Federal Elements. Therefore, under the Greenbelt Alternative, there would also be direct, long-term, adverse impacts to land use at the Greenbelt site.

Figure 5-34: Greenbelt Viewshed Analysis



**Site Boundary**  
**Viewshed**  
 Areas Where Main Building is Visible  
 Areas Where Main Building is Not Visible



0 1,000 2,000  
 Feet  
 1 inch = 2,000 feet

Sources:  
 ESRI (2013), GSA (2013)  
 Prince George's County (2013)

### 5.2.5 Visual Resources

The following sections describe the environmental consequences for visual resources under both the No-action Alternative at Greenbelt and the Greenbelt Alternative.

**VISUAL RESOURCES  
 ASSESSMENT OF SIGNIFICANCE**

Impacts to visual resources under the Greenbelt Alternative would result in significant impacts, as defined in section 3.6.3.

#### No-action Alternative

Under the No-action Alternative at the Greenbelt site, the entirety of the Greenbelt Metro Station would be redeveloped as a mixed-use community. This development would change the visual character of the site by constructing facilities of a greater height and density than currently exists on-site as well as compared to its environs. Although the final heights and lighting requirements of the mixed-use development are unknown at this time, it is expected that the density and building form changes at the site would be noticeable throughout the surrounding area. Therefore, under the No-action Alternative at the Greenbelt site, there would be indirect, long-term, adverse impacts to visual resources.

#### Greenbelt Alternative

Based on the conceptual site plan and preliminary estimates, the Main Building, which would be constructed within the 4.1-acre Main Building Developable Area, is assumed to have a maximum building height of approximately 17 stories. Parking structures at the Greenbelt site are assumed to not exceed approximately 8 stories while the Central Utility Plant (CUP), Remote Delivery Facility (RDF), gatehouses, and visitor's center would not exceed 2 stories in height. In order to envisage the visibility of the Main Building to the surrounding area, a viewshed analysis for the Greenbelt site was completed for the Main Building Developable Area in ArcMap.

The analysis applied the maximum Main Building height (225 feet) to the entirety of the Main Building Developable Area, and calculated views based on the existing ground topography and the obstruction caused by trees in the viewshed.

The visual characteristics would dramatically change with the addition of the consolidated FBI HQ, and density and building form changes would be readily apparent since the current site is mainly split between paved asphalt and a wooded area. The maximum building height of a consolidated FBI HQ at the Greenbelt site would be distinctively higher than the surrounding area and would alter the skyline.

Aside from a few small ravines throughout the forested area, along the Capital Beltway and along the Metrorail tracks, the Main Building Developable Area would be readily visible within a quarter mile. Tree line buffers would potentially lessen the view from the housing development east of Cherrywood Lane and the Hollywood community. Because the Capital Beltway is elevated, views of the site would be prominent from this road. As a result direct, long-term, major adverse impacts related to the high visibility of the Main Building are expected under the Greenbelt Alternative. Notwithstanding, these impacts, these changes in the visual character of the Greenbelt site are envisioned for the North Core by Prince George's County as outlined in the Greenbelt Sector Plan and SMA, Plan Prince George's, and other local and regional planning initiatives. There would be no measurable short-term impacts under either the No-action or Greenbelt Alternatives, and there would be no measurable short- or long-term impacts associated with the recommended transportation mitigations, as shown in figure 5-47. The results of the viewshed analysis for the Greenbelt site is shown in figure 5-34.

**GREENBELT VISUAL RESOURCES  
 ENVIRONMENTAL CONSEQUENCES  
 SUMMARY**

**No-action Alternative:** Indirect, long-term, adverse impacts.

**Greenbelt Alternative:** Direct, long-term, major adverse impacts.

Figure 5-35: Greenbelt Shadow Analysis



**GREENBELT ARCHAEOLOGICAL RESOURCES ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-action Alternative:** No measurable impacts.

**Greenbelt Alternative:** No measurable impacts.

**GREENBELT HISTORIC RESOURCES ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-action Alternative:** No measurable impacts.

**Greenbelt Alternative:** No measurable impacts.

**Shadow Analysis**

In order to compliment the visual analysis, a shadow analysis was performed to estimate how shadows cast by the Main Building may impact the surrounding area, as described in section 3.6. As shown in figure 5-35, shadows are more pronounced in the winter than in the summer. During winter mornings, long shadows would extend to the west of the Main Building but would not extend beyond the adjacent Greenbelt Station Parkway. However this shadow may adversely impact daylighting for the adjacent mixed-use building, depending on final design of both the consolidated FBI HQ and adjacent mixed-use development. During winter solstice evenings, long shadows would extend to the northeast, however they would not interfere with I-95/I-495 to the northeast. Therefore, under the Greenbelt Alternative, there could be direct, long-term, adverse impacts to visual resources as a result of shadows cast by the Main Building on the adjacent mixed-use development during winter mornings.

**Lighting Impacts**

Due to security requirements, the consolidated FBI HQ would be a well-lit facility, with a minimum of 1 foot candle across the entire site during non-daylight hours. Full cut offs would be used to minimize light pollution to the surrounding area. Illumination from the consolidated FBI HQ would have an additive effect with the lighting from Greenbelt Metro Station. Depending on the remaining tree buffer this additional lighting may affect the Franklin Park and Hollywood communities, as well as wildlife in the Indian Creek riparian forest, as described in section 5.2.3.4. As a result, direct, long-term, adverse impacts to wildlife and adjacent residential communities related to lighting are expected under the Greenbelt Alternative.

**5.2.6 Cultural Resources**

The following sections describe the environmental consequences for cultural resources under both the No-action Alternative at Greenbelt and the Greenbelt Alternative.

**CULTURAL RESOURCES ASSESSMENT OF SIGNIFICANCE**

Impacts to cultural resources would not result in significant impacts, as defined in section 3.7.3.

**5.2.6.1 Archaeological Resources**

**No-action Alternative**

Under the No-action Alternative at the Greenbelt site, there would be no measurable impacts to archaeological resources because, although the site would be developed as a new mixed-use community, there would continue to be a low potential for intact artifacts at the site due to previous disturbance by sand and gravel mining and the development of the Greenbelt Metro Station.

**Greenbelt Alternative**

Under the Greenbelt Alternative, there would be no measurable impacts to archaeological resources at the Greenbelt site because there is a low potential for intact resources to exist on the portion of the site where the campus facilities would be located. The low potential for intact resources is due to previous disturbance by sand and gravel mining and the development of the Greenbelt Metro Station.

Should there be an unanticipated discovery of archaeological resources during construction, GSA would continue Section 106 consultation with the MD SHPO and other parties through the standard review process under 36 CFR §800. Through this ongoing process, any impacts to archaeological resources would be avoided or mitigated to the extent that they would not be measurable. This stipulation would be included in the Section 106 Programmatic Agreement (PA) for the project.

**5.2.6.2 Historic Resources**

**No-action Alternative**

Under the No-action Alternative at the Greenbelt site, no measurable impacts to historic resources are expected. As noted in section 5.1.6.2, there are no historic resources on the Greenbelt site. Architectural resources 50 years of age or older within the APE for the Greenbelt site are unlikely to be eligible for listing on the NRHP as historic districts or as individual resources. If any of the resources are determined eligible, indirect visual impacts from the redevelopment of the Greenbelt Metro Station could be long-term. Existing tree lines would buffer views from potential historic resources towards the site, however the redevelopment could diminish the integrity of potential historic resources in the APE. Therefore, there would be no measurable impacts as a result of the redevelopment of the Greenbelt Metro Station as a mixed-use community under the No-action Alternative.

## Greenbelt Alternative

GSA initiated Section 106 consultation with MHT (MD SHPO) on May 14, 2015. The initiation letter included information on previous studies and identified resources within the APE that are 50 years of age or older, the threshold used for listing resources in the NRHP. In a letter dated August 17, 2015, the MD SHPO commented on the potential for historic resources in the APE, noting that there would not be substantive historic preservation or archaeological resource issues. However they recommended a more detailed study of the potential visual impacts to the Greenbelt NHL, the closest portion of which is less than 1 mile from the Greenbelt site. The eligibility of these resources is dependent on further consultation with the MD SHPO. Similar to the No-action Alternative, the Greenbelt Alternative would have no direct measurable impact to historic resources because there are no historic resources located on the site.

Similar to the No-action Alternative, visual impacts to historic structures would be direct, long-term, and adverse. While the Main Building would be taller than existing development in proximity to the site as well as taller than the buildings proposed under the No-action Alternative, trees and vegetation surrounding the site would diffuse views of the consolidated FBI HQ from adjacent historic properties. Therefore, under the Greenbelt Alternative, impacts to historic resources could be direct, long-term, and adverse; however when compared to the No-action Alternative, there would be no measurable impacts. There would be no measurable impacts to historic resources from the recommended transportation mitigation measures, as shown in figure 5-47.

## 5.2.7 Socioeconomic and Environmental Justice

Impacts related to changes in population and demographics as a result of consolidating FBI HQ at the Greenbelt site are considered in the context of the local economy of Prince George's County, the Washington, D.C., MSA, and the State of Maryland. Impacts to tax revenues, population, housing, schools, and community facilities and services of Prince George's County, the Washington, D.C., MSA, and the State of Maryland, are all described qualitatively. Benchmarks for some impacts, such as impacts to construction employment, have been created by identifying the greatest annual change over a recent historical period to create a quantitative threshold for the magnitude of impacts to each resource.

### **SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE ASSESSMENT OF SIGNIFICANCE**

Impacts to socioeconomics and environmental justice would not result in significant impacts, as defined in section 3.8.3.

### 5.2.7.1 Population and Housing

#### No-action Alternative

Under the No-action Alternative at the Greenbelt site, the population in Prince George's County and the Washington, D.C., MSA could increase as a result of employees who relocate their permanent residences to Prince George's County or the Washington, D.C., MSA as a result of gaining employment in the retail, commercial, or hotel facilities associated with the mixed-use community or who move from outside Prince George's County or the Washington, D.C., MSA to one of the 800 residential units that would be constructed under this alternative. The size of these residential units is not known at this time; however, this analysis assumes that the residential units would be larger at this site than those under RFDS 2 for the JEH parcel. If each unit contains a family of two parents and one child, which is possible given that the average household size in this area is 2.78 persons, then the total population increase in Prince George's County and the Washington, D.C., MSA would be 2,400 people, a 0.27 and 0.04 percent increase of Prince George's County and the Washington, D.C., MSA's 2013 populations, respectively. This is the maximum level of impact possible that could be associated with the population change resulting from these residential units on Prince George's County or the Washington, D.C., MSA.

The greatest percentage change in the year-over-year population in recent history for Prince George's County was approximately 1.8 percent, which occurred between 2000 and 2001. The greatest year-over-year change in population for the Washington, D.C., MSA was 3.3 percent which occurred between 2005 and 2006. The increase in population under the No-action Alternative in both the Prince George's County and the Washington, D.C., MSA would be less than these area's respective percentage historical population changes. This change in population would result in an indirect and long-term impact to the local population. The length and strength of the impact and the adverse or beneficial nature of the impact resulting from a change in population are discussed in the following sections because a change in population impacts housing, employment, income, recreation, and community services in different ways.

### **GREENBELT POPULATION & HOUSING ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-action Alternative:** Indirect, long-term impacts to population; insufficient information available to determine the impacts to the homeownership and rental markets under this alternative.

**Greenbelt Alternative:** No measurable impacts to population in Prince George's County or the Washington, D.C., MSA. Impacts to housing in Prince George's County cannot be assessed due to insufficient information at this time.

## GREENBELT EMPLOYMENT & INCOME ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** Indirect, short- and long-term, beneficial impacts.

**Greenbelt Alternative:** Indirect, short- and long-term, beneficial impacts.

Under the No-action Alternative, the amount of housing available would increase in Prince George's County and the Washington, D.C., MSA by 2.4 and 0.04 percent, respectively. In recent history, the greatest year-over-year increase in housing vacancy occurred between 2006 and 2007 in Prince George's County (31.5 percent) and between 2005 and 2006 in the Washington, D.C., MSA (1.8 percent). The latest total housing vacancy statistics for these two areas are shown in section 5.1.7.1. The increase of 800 housing units under this alternative would be less than the greatest recent year-over-year increase in housing vacancy and would make up less than one percent of all vacant housing in both Prince George's County and the Washington, D.C., MSA. As the housing unit increase would provide more housing for local residents, this could lead to a slight decrease in housing prices by increasing housing supply. Therefore, this alternative could result in indirect, short-term, beneficial impacts to homebuyers, and, conversely, result in adverse impacts to home sellers due to increased housing supply in the local market. Should the units be marketed as rental units, similar beneficial and adverse impacts could occur to renters and landlords, respectively. Since the number of residential units that would be owner- or renter-occupied is unknown at this time, there is insufficient information available to determine the impacts to the homeownership and rental markets under this alternative.

In addition to new residential units and commercial space, new retail establishments and two hotels would be also added to the site. Given the nature of the retail and hotel jobs and the current employment trends in Prince George's County and the Washington, D.C., MSA, it is assumed that these new retail establishments and hotels would be staffed predominantly by individuals who would not relocate to Prince George's County or the Washington, D.C., MSA to work at these businesses. However, some owners and managers of these businesses may relocate to Prince George's County or the Washington, D.C., MSA to operate these retail stores or the hotel. Because the number of individuals relocating to Prince George's County or the Washington, D.C., MSA is likely to be very small relative to the total population, there would be no measurable impact to population or housing as result of the construction and operation of ground-floor retail and hotel establishments.

## Greenbelt Alternative

### Population

The Greenbelt Alternative would result in a potential relocation of a portion of FBI HQ's employed workforce. It is possible that some, but not all, of these employees and their families would relocate their primary residences to be closer to the Greenbelt site while others would alter their commuting patterns to the consolidated FBI HQ at Greenbelt. It is assumed that most of the current FBI HQ employees reside within the Washington, D.C., MSA. As any movement of their primary residences or commutes would likely be from one area to another within the Washington, D.C., MSA, there would be no measurable impact to population as a result of FBI HQ employees relocating their primary residence or changing commute patterns under this alternative. Some FBI HQ employees may choose to relocate to Prince George's County from outside of Prince George's County in order to be closer to the new FBI HQ location under this alternative. However, the amount of employees that would relocate to the County from outside the County is unknown; therefore, the population impacts of these relocations on Prince George's County cannot be assessed. Additionally, some current FBI HQ employees may choose to quit the FBI as a result of this alternative and new employees may be hired that live closer to the new FBI HQ site.

### Housing

It is assumed that most of the current FBI HQ employees reside within the Washington, D.C., MSA. If these employees relocated their primary residences as a result of this alternative it is likely that they would relocate to another area of the Washington, D.C., MSA. Therefore, there would be no net impact to housing within the Washington, D.C., MSA which would result in no measurable impact to housing as result of this alternative. Some current FBI HQ employees may relocate to Prince George's County from outside of Prince George's County. However, the total amount of employees that would relocate to the County from outside the County is unknown; therefore, the housing impacts of these relocations on Prince George's County cannot be assessed due to insufficient information at this time.

## 5.2.7.2 Employment and Income

### No-action Alternative

#### *Construction; Commercial, Hotel, and Retail Operations; and Residential-related Spending*

For the purpose of this analysis, it is assumed that a majority of spending associated with the construction of the mixed-use community under the No-action Alternative at the Greenbelt site would occur within the Washington, D.C., MSA. Once construction is complete and the commercial space at this site houses employees, there would be daily expenditures by employees and office-related spending on maintenance, office supplies, and services. This operations-related spending would lead to an indirect, long-term, beneficial impacts to sales, employment, and income in Prince George's County and the Washington, D.C., MSA.

There would be indirect, short-term, beneficial impacts to employment and income within Prince George's County and the Washington, D.C., MSA as a result of construction-related spending. Hotel and retail operations-related spending would result in indirect, long-term, beneficial impacts to employment and income in Prince George's County and the Washington, D.C., MSA. Therefore, there would be indirect, short- and long-term, beneficial impacts to employment and income in Washington, D.C., and the Washington, D.C., MSA as a result of construction-related spending and operations, hotel, and retail-related spending.

The new 800 residential units would be home to approximately 2,400 people who would likely spend their income in Prince George's County and the Washington, D.C., MSA. Residents who relocate to Prince George's County or the Washington, D.C., MSA from outside of these two areas would have indirect, long-term, beneficial impacts to income, sales, and employment in Prince George's County and the Washington, D.C., MSA as a result of their spending on rent, food, and other services.

### *Commercial, Hotel, and Retail Operations Employment*

Under the No-action Alternative at the Greenbelt site, the employed workforce of commercial, retail, and hotel operations associated with the new mixed-use development would have indirect, long-term, beneficial impacts to sales, income, and employment in Prince George's County and the Washington, D.C., MSA as a result of these employees spending their income on goods and services in these two areas.

### *Construction Employment*

In 2011, the latest year for which construction employment information for the Washington, D.C., MSA is available, the construction sector comprised 4.6 percent (181,745 jobs) of all of jobs in the Washington, D.C., MSA (BEA 2013; BLS 2014). In Prince George's County, the number of jobs in the construction industry comprised approximately 8 percent of all jobs in 2013. The total number of jobs in the construction industry in 2011 in the Washington, D.C., MSA was five times the number of jobs in the construction industry in Prince George's County in 2013.

The largest year-over-year increase (9.6 percent) in construction jobs in the Washington, D.C., MSA occurred between 2005 and 2006 (BEA 2013). The greatest year-over-year negative change in construction jobs in the Washington, D.C., MSA occurred between 2007 and 2008 with an approximately 15 percent decrease in construction full-time and part-time jobs (BEA 2013). This represents a loss of 38,044 jobs in the Washington, D.C., MSA<sup>4</sup> (BEA 2013).

<sup>4</sup>BEA data on construction employment in the Washington, D.C., MSA for 2012 and 2013 was not available so the historic year-to-year change was identified only for 2001 to 2011.

Similar to the RFDS 1 and 2 Scenarios under the JEH Alternative, a majority of the construction workers for this construction project are assumed to come from the Washington, D.C., MSA and would not relocate to the Washington, D.C., MSA as a result of the No-action Alternative. However, due to the amount of future construction planned for the Washington, D.C., MSA, it is possible that there would not be enough qualified construction workers available to work on this project in the future. Therefore, some construction workers could relocate to the Washington, D.C., MSA in order to construct the facilities under this alternative. Additionally, there may be some specialized construction workers that are needed for this project that do not reside in the Washington, D.C., MSA. These workers would have to temporarily relocate to the Washington, D.C., MSA during the construction period. Any temporary relocation of construction workers to the Washington, D.C., MSA would have indirect, short-term, beneficial impacts to the local lodging, food and beverage, and retail sectors as these construction workers spend their income in the Washington, D.C., MSA.

The impact of the No-action Alternative at the Greenbelt site on the available supply of local construction workers would depend on the total cost of the project. At this time, without further information on anticipated construction employment levels or total cost, it is not possible to determine the impacts of construction employment associated with the No-action Alternative in Prince George's County or the Washington, D.C., MSA.

### **Greenbelt Alternative**

#### *Construction and Operations-Related Spending*

For the purpose of this analysis, it is assumed that a majority of project-related spending associated with the Greenbelt Alternative would occur within the Washington, D.C., MSA.

During the operations period, daily expenditures by employees and office-related spending on maintenance, office supplies, and services would likely be similar to current FBI HQ levels. Because the existing FBI HQ and the Greenbelt site are both

in the Washington, D.C., MSA, there would be no measurable long-term impact to the Washington, D.C., MSA from operations-related spending. However, there would likely be some indirect, long-term, beneficial impacts to employment, sales, and income in the area surrounding the Greenbelt site as FBI HQ employees purchase food and beverages, gasoline, automobile services, and other retail goods.

Therefore, there would be indirect, short-term, beneficial impacts to Prince George's County and the Washington, D.C., MSA as a result of construction-related spending and indirect, long-term, beneficial impacts to Prince George's County and no measurable impact to the Washington, D.C., MSA as a result of operations-related spending.

### *Construction Employment*

Under the Greenbelt Alternative, it is expected that there would be approximately 2.6 million gsf of construction. According to the St. Elizabeths EIS, this level of renovation would require 6,720 full-time equivalent construction workers for a one-year period. These workers would earn an average salary of approximately \$46,900, resulting in approximately \$315 million in construction wages that would result directly from project spending. However, it is not likely that all 6,720 construction workers would be employed for only one year and, instead, the project would occur over multiple years which would reduce the impact intensity to the local construction jobs.

Similar to the findings under RFDS 1 and the No-action Alternative at the Greenbelt site, most of the construction workforce is expected to come from within the Washington, D.C., MSA. However, due to the specialization requirements of some construction jobs and the high number of future construction project, it is possible that some construction workers could relocate to the Washington, D.C., MSA in order to construct the facilities under this alternative during the construction period. Any temporary relocation of construction workers to the Washington, D.C., MSA would have indirect, short-term, beneficial impacts to the local lodging, food and beverage, and retail sectors when these construction workers spend their income in the Washington, D.C., MSA.

**GREENBELT TAXES  
ENVIRONMENTAL CONSEQUENCES  
SUMMARY**

**No-action Alternative:** Indirect, long-term, beneficial impacts.

**Greenbelt Alternative:** No measurable impacts to property tax revenues. Indirect, long-term, beneficial impacts to sales and income tax revenues.

**GREENBELT SCHOOLS &  
COMMUNITY SERVICES  
ENVIRONMENTAL CONSEQUENCES  
SUMMARY**

**No-action Alternative:** Insufficient information available to determine impacts to community services. No measurable short-term impacts to schools. Insufficient information available to determine long-term impacts to schools.

**Greenbelt Alternative:** No measurable impacts to schools in the Washington D.C. MSA. Insufficient information to determine impacts to schools in Prince George's County. No measurable short-term impacts to community services. Insufficient information to determine long-term impacts to community services.

*Operations Employment*

Because current FBI HQ employees work within the Washington, D.C., MSA, there would be no new impacts to the Washington, D.C., MSA as a result of the employment of operations-related employees. However, there may be indirect, long-term, beneficial impacts to sales, income, and employment in Prince George's County as a result of commuting employees who spend their income locally during the workday and those employees that choose to relocate their primary residence to Prince George's County.

**5.2.7.3 Taxes**

**No-action Alternative**

Under the No-action Alternative at the Greenbelt site, the transfer of the Greenbelt site from a government agency owned parcel to a privately owned parcel would result in an increase in property tax revenues to Prince George's County. It is anticipated that private property taxes on the parcel would be higher than the current taxes paid on the site. If the property is transferred to the exchange partner, there would be indirect, short-term increases in property taxes; however, once the site is transferred to GSA, property taxes will no longer be collected.

There may be some impacts to sales and income taxes in Prince George's County and the Washington, D.C., MSA during the construction period as a result of income taxes that would be applied to the income of construction workers and sales taxes applied to goods and services that are procured to support the construction of this development. This would result in indirect, short-term, beneficial impacts to Prince George's County's sales and income tax revenues.

There would be an increase in sales and income tax revenues to Prince George's County as a result of the commercial developments (retail, hotel, etc.) under this alternative. Additionally, any products purchased within Prince George's County or the Washington, D.C., MSA by individuals who relocated there and any incomes earned by those same individuals would generate sales and income taxes for Prince George's County or the Washington, D.C., MSA, respectively. These

increases in sales and income taxes would result in indirect, long-term, beneficial impacts to Prince George's County and the Washington, D.C., MSA.

**Greenbelt Alternative**

The transfer of the Greenbelt site from a government agency (WMATA and the State of Maryland) ownership to a federally owned parcel would not result in a change to property tax revenues in Prince George's County as there are currently no property taxes paid on the site and none would be paid if it is transferred to the Federal Government.

There would be some impacts to sales and income taxes in Prince George's County and the Washington, D.C., MSA during the construction period as a result of income taxes that would be applied to the income of construction workers and sales taxes applied to goods and services that are procured to support the construction of the consolidated FBI HQ. This would result in indirect, short-term, beneficial impacts to Prince George's County's and the Washington, D.C., MSA's sales and income tax revenues.

There would be an increase in sales and income tax revenues to Prince George's County as a result of FBI HQ employees spending their income within the County. Additionally, any incomes earned by individuals who relocated to Prince George's County or the Washington, D.C., MSA from outside of these areas as a result of this project would generate income taxes for Prince George's County or the Washington, D.C., MSA, respectively. These increases in sales and income taxes would result in indirect, long-term, beneficial impacts to tax revenues in Prince George's County and the Washington, D.C., MSA, respectively.

**5.2.7.4 Schools and Community Services**

The affected environment of schools and community services is described in section 5.1.7.4, Schools, and section 5.1.7.5, Community Services. The impacts analysis for these two topics is described together.

**No-action Alternative**

The No-action Alternative at the Greenbelt site could result in indirect, short-term, adverse impacts to police services, fire and emergency services, and medical facilities by increasing the demand for these services during the construction period. However, there is insufficient information available at this time to determine these impacts as the amount of additional demand that would be placed on community services during the construction period is unknown. This alternative would result in additional commuters to the Greenbelt site which could result in the need for additional police and law enforcement support for a variety of reasons, including occasional traffic control and accident response in the local area. There may be some localized impacts to police services, fire and emergency services, and medical facilities from the operation of the new facilities at the site under this alternative. However, there would likely be no measurable impact to these services given the suburban nature of the project site and the concentration of businesses that are already served by these community services in the area.

Long-term Impacts to community services, such as fire and emergency services, police services, and medical facilities arising from employees that permanently relocate to Prince George's County or the Washington, D.C., MSA in order to work or live on the project site are expected to be proportional to the impacts described under the housing and population analyses. Therefore, impacts to community services as a result of families or operations-related employees permanently relocating to Prince George's County or the Washington, D.C., MSA is expected to be indirect and adverse as community services adjust to changes in the level of the serviced population. However, there is insufficient information available at this time to determine these impacts as the amount of additional demand that would be placed on community services during the operational period is unknown.

There would be no measurable short-term impacts to schools. Over the long-term, this alternative would result in the relocation of at least 2,400 persons and an unknown number of commercial, hotel, and retail operations employees that choose to relocate their primary residences as a result of this alternative. A portion of these persons could relocate with children that would attend schools within Prince George's County or the Washington, D.C., MSA. Impacts to schools in Prince George's County would occur as a result of those families that relocate from outside the County and have children that would attend schools in Prince George's County. Similar impacts to schools in the Washington, D.C., MSA would occur as a result of those families that relocate to the Washington, D.C., MSA under this alternative and have children that would attend schools in the Washington, D.C., MSA. However, it is likely that not all of these families would relocate to Prince George's County or the Washington, D.C., MSA from outside these areas. Furthermore, it is not likely that all of the families that relocate would have children. Therefore, the relocation of families into Prince George's County and the Washington, D.C., MSA could have an indirect, long-term, adverse impact to schools as a result of increasing the student load on the local school system until the system adjusts to the increase in the number of students and an indirect, long-term, beneficial impact as a result of increased school funding through increased property taxes. However, there is insufficient information available at this time to determine the impacts that would occur to schools as the amount of additional demand that would be placed on schools in the long-term as a result of this alternative is unknown.

### **Greenbelt Alternative**

The Greenbelt Alternative could result in the potential relocation of some of the current FBI HQ's total employed workforce. Some of these employees would relocate with their families. However, as described in the Population and Housing analysis, it is assumed that many of these employees currently reside in the Washington, D.C., MSA and if they relocate their primary residences as result of this alternative, their

new residence would likely continue to be located within the Washington, D.C., MSA. Therefore, there are no measurable impacts to schools in the Washington, D.C., MSA as a result of employees changing permanent residences within the Washington, D.C., MSA.

Impacts to community services during the construction period would be the same as those described under the No-action Alternative. However, impacts to community services during the operations period would be comparable to the impacts under the No-action operations period as the total daytime working population at the site under the No-action and Greenbelt Alternatives would be similar at the Greenbelt site. As there would not be two hotels and 800 residential units under the Greenbelt Alternative, it is likely that there would be fewer impacts to community services during non-business hours under this alternative than under the No-action Alternative.

Some FBI HQ employees may choose to relocate to Prince George's County from outside of Prince George's County in order to be closer to the new FBI HQ location under this alternative. However, the amount of employees that would relocate to the County from outside the County is unknown; therefore, the impacts of these relocations on Prince George's County schools cannot be assessed. Any movement of families into Prince George's County could have an indirect, long-term, adverse impact to schools as a result of increasing the student load on the local school system until the system adjusts to the increase in the number of students, and a long-term, beneficial impact as a result of increased school funding through increased property taxes. However, there is insufficient information available at this time to determine the impact to schools in Prince George's County as we do not know the number of persons that would relocate to Prince George's County as a result of this alternative.

Additional commuters to the Greenbelt site within the Washington, D.C., MSA might result in the need for additional police and law enforcement support for a variety of reasons (e.g., occasional traffic control, accident response) in the local area. However,

commuters would be moving within the Washington, D.C., MSA so there would be no change in the impacts to the public services in the Washington, D.C., MSA. Locally, there would likely be no measurable impacts to police services, fire and emergency services, and medical facilities from the operation of the consolidated FBI HQ under this alternative given the suburban nature of the area, the concentration of businesses already in the area that support these services, and because the FBI has its own police force that acts as security for FBI facilities, information, and personnel.

### **5.2.7.5 Recreation and Other Community Facilities**

#### **No-action Alternative**

Under the No-action Alternative at the Greenbelt site, the daily commuter population to the Greenbelt site could increase and there would be approximately 2,400 persons living on the site in addition to office employees and visitors that would travel to the site to shop in the retail establishments and stay in hotels that would be created under this alternative. These commuters, visitors, and residents could visit local parks, recreation centers, gyms, and other community facilities. These visits could occur at all times, including workdays and weekends. As the total commuter, visitor, and residential population could increase under this alternative, both indirect, adverse and beneficial indirect, long-term impacts to recreation resources and other community facilities could occur. These impacts could occur due to increased visitation at these sites which could lead to their overuse and damage, and as a result of commuters, visitors, and residents spending their income to support these resources which could support local employment, income, and sales, respectively. However, there is insufficient information available at this time to determine the impacts that would occur to recreation and other community facilities.

## **GREENBELT RECREATION & OTHER COMMUNITY FACILITIES ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-action Alternative:** Insufficient information available at this time to determine the impacts that would occur to recreation and other community facilities.

**Greenbelt Alternative:** Insufficient information available at this time to determine the impacts that would occur to recreation and other community facilities.

## GREENBELT ENVIRONMENTAL JUSTICE ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** No measurable impacts.

**Greenbelt Alternative:** No short- or long-term adverse impacts to minority or low-income communities.

### Greenbelt Alternative

Under the Greenbelt Alternative, the daily commuter population could increase by 11,000 persons. These commuters could visit local parks, recreation centers, gyms, or other community facilities during weekdays. These impacts are likely to occur during the early mornings, mid-day lunch hour, or in the evenings. The Greenbelt Alternative is expected to have an employee gymnasium on-site which could mitigate impacts to local recreation facilities as employees would likely use the on-site facility as opposed to community recreation facilities. Both indirect, long-term, adverse and beneficial impacts to recreation resources and other community facilities could occur due to increased visitation at these sites and as a result of FBI HQ employees spending their income at these resources, respectively. As shown under the No-action Alternative, increased site visitation can lead to overuse of sites and damage to sites and employee spending could support local employment, income, and sales. However, similar to the No-action Alternative, there is insufficient information available at this time to determine the impacts that would occur to recreation and other community facilities under this alternative.

#### 5.2.7.6 Environmental Justice

##### No-action Alternative

Of the 10 Census tracts within 1 mile of the Greenbelt site, there is one tract with more than 20 percent of its population living below poverty, two tracts with relatively high minority populations, and two tracts that meet both criteria. Therefore, half of the Census tracts within 1 mile of the Greenbelt site contain sensitive communities.

The development of the Greenbelt site as a mixed-use community could result in the creation of jobs in Prince George's County as businesses provide goods and services to construction workers, commuters, visitors, and residents. These businesses could positively impact the local community and the Washington, D.C., MSA through the creation of new income, employment, and sales in both the short- and long-term. Some new construction-related jobs would also be created in the short term, which could result in the creation of additional income and employment for local residents, while over the long term there would be additional employment opportunities created by retail establishments and hotel. Some of the local residents that fill these jobs could come from the low-income or minority communities identified in section 5.2.7.6. However, actual hiring practices would be determined by the construction contractor for this project or by proprietors who own these businesses; therefore, it is not certain that any jobs created under this alternative would be filled by persons from low-income or minority communities. Furthermore, the addition of new housing could result in lowered housing prices as a result of increased supply, leading to indirect, short-term, beneficial impacts to minority and low-income homebuyers. However, indirect, short-term, adverse impacts could occur to minority and low-income home sellers as home prices, independent of other factors, could be lower as a result of increased housing supply.

As indicated in section 5.2.9, there would be no adverse impacts to transportation or transit services under this alternative. Air quality impacts, while adverse, would disperse across an area wider than the 1-mile radius of the site used for the environmental justice analysis and would therefore impact more census tracts than those identified under this analysis. Furthermore, NAAQS would not be exceeded at the closest sensitive receptors, resulting in no adverse impacts. As any air quality impacts would occur to census tracts both within and outside the 1-mile boundary of the Greenbelt site, there would be no disproportionate impacts to sensitive populations. As national air quality standards would not be exceeded, there is no adverse impact.

Impacts from noise would be adverse during the short-term. However, it is expected that construction crews would follow local noise ordinances, including timing of construction noise, in order to mitigate adverse impacts to sensitive populations. Therefore, there are not anticipated to be any environmental justice impacts under this alternative.

##### Greenbelt Alternative

Impacts under the Greenbelt Alternative would be similar to those described under the No-action Alternative with the exception of impacts resulting from site visitors and residents. Some retail facilities could be constructed on the property, but these would likely be facilities that replace like-facilities at various FBI buildings throughout the Washington, D.C., MSA which would result in no new measurable economic impacts. There would be no residences constructed on the site under this alternative. Therefore, there would be no employment and income impacts associated with businesses selling goods and services to visitors or residents under this alternative. However, there could be still be a beneficial impacts to employment and income in the local community and the Washington D.C., MSA as businesses provide goods and services to construction workers and FBI HQ employees. These businesses could positively impact both low-income and minority communities through the creation of new income, employment, and sales in both the short and long-term. Some new construction-related jobs could also be created in the short-term, which could result in the creation of additional income and employment for local residents. Some of the local residents that fill these jobs could come from the low-income or minority communities identified in section 5.2.7.6. However, actual hiring practices would be determined by the construction contractor for this project or by proprietors who own these businesses; therefore, it is not certain that any jobs created under this alternative would be filled by persons from low-income or minority communities.

Traffic, air quality, and noise impacts and mitigation measures would be the same under this alternative as they are under the No-action Alternative. Therefore, as there would be no long-term adverse and disproportionate impacts to minority or low-income communities under this alternative, and as short-term adverse impacts would be mitigated to the extent practicable and permitted by law, there are not anticipated to be any environmental justice impacts under this alternative.

### 5.2.7.7 Protection of Children

#### No-action Alternative

As described in section 5.1.7.5, all four childcare centers that have been identified within 1 mile of the project site are located north of the site on the north side of I-95; therefore, no measurable impacts to these childcare centers are expected. Springhill Lake Elementary School, Greenbelt Middle School, and the Robert Goddard French Immersion School are located in a community that is southwest of the Greenbelt site. There are major roads that circumnavigate this community that could be used for construction traffic and may see an increase in commuter traffic. Hollywood Elementary School, the Al-Huda School, and Berwyn Christian School are located west of the Greenbelt site on the other side of the Metrorail tracks; therefore, no measurable impacts to these schools are expected. Neighborhoods that could be impacted by construction noise and air quality issues are located to the west of the site across the Metrorail tracks and southeast of the site across Cherrywood Lane. Under the No-action Alternative at the Greenbelt site, some impacts to children, such as releases of odor and dust during the construction of the mixed-use development, may occur as a result of children living in the neighborhoods in close proximity to the proposed location for this alternative. Additionally, an increase in construction and operations-related traffic to and from the project site could impact children that are commuting or walking to school. However, as the neighborhoods most likely to be impacted by this alternative are not made up predominantly of children and as children wouldn't be disproportionately and adversely impacted by this project's construction or operation, there are not anticipated to be any measurable impacts to children as a result of this alternative.

#### Greenbelt Alternative

Impacts to children would be the same as those described under the No-action Alternative. Therefore, no measurable impacts to children are expected from the Greenbelt Alternative.

### 5.2.8 Public Health and Safety/ Hazardous Materials

The following sections describe the environmental consequences for public health and safety and hazardous materials under both the No-action Alternative at Greenbelt and the Greenbelt Alternative.

#### PUBLIC HEALTH AND SAFETY/ HAZARDOUS MATERIALS ASSESSMENT OF SIGNIFICANCE

Impacts to public health and safety would not result in significant impacts, as defined in section 3.9.3.

#### 5.2.8.1 Public Health and Safety

##### No-action Alternative

Under the No-action Alternative at the Greenbelt site, the entire Greenbelt Metro Station would be redeveloped as a mixed-use community. During construction activities associated with development of the site, contractors would be required to ensure that workers receive proper safety training for operation of mechanical equipment and utilize proper safety clothing, equipment, and procedures at all times. These measures would be expected to minimize the risk of injury and the related need for emergency response.

Fire, emergency, and law enforcement response times to the Greenbelt site are rapid, as described under section 5.1.8, and improved roadway infrastructure, especially the improvement of Capital Beltway ramps, would be designed to accommodate increased vehicular traffic to the site. Therefore, accessibility of emergency personnel to the site under the No-action Alternative would be consistent with current levels of service. The increased commercial activity and residential population at the Greenbelt site associated with the No-action Alternative may generate increased demand for fire, law enforcement, and emergency response, however it is expected that Prince George's County Police and Fire and Emergency services would address any capacity issues as part of their long-range planning efforts. Therefore, under the No-action Alternative, indirect, short-term, adverse impacts to public health and safety would occur as a result of construction activity. There could be additional indirect, long-term, adverse impacts associated with lack of capacity for the additional demand that may be generated by the mixed-use development.

##### Greenbelt Alternative

Under the Greenbelt Alternative, construction activities would directly impact public health and safety in the same manner as they would under the No-action Alternative.

As a high profile Federal building, the presence of the FBI HQ at the Greenbelt site could increase the potential for intentional destructive acts; however, the FBI would maintain a site-specific emergency response plan to minimize any potential risks to FBI employees or the public. Likewise, the response time and capacity of existing law enforcement, fire, and emergency response agencies is expected to be adequate at the Greenbelt site.

Lastly, the operation of a firing range for employee use within the campus could pose safety concerns to employees using the facility. Public access would be restricted and employee use would be consistent with OSHA regulations (29 CFR Parts 1900–1999); however, a slight risk of injury would remain. Consequently, there could be direct, long-term, adverse impacts to emergency services and life safety at the Greenbelt site.

#### GREENBELT PROTECTION OF CHILDREN ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** No measurable impacts to children.

**Greenbelt Alternative:** No mitigation of disproportionate and adverse impacts to children is required under EO 13045.

#### GREENBELT PUBLIC HEALTH AND SAFETY ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** Indirect, short-term, adverse impacts.

**Greenbelt Alternative:** Direct, short-term, adverse impacts, and direct, long-term, beneficial impacts as a result of transportation mitigations.

#### GREENBELT HAZARDOUS MATERIALS ENVIRONMENTAL CONSEQUENCES SUMMARY

**No-action Alternative:** No measurable impacts.

**Greenbelt Alternative:** No measurable impacts.

## GREENBELT NO-BUILD CONDITION

Unlike the evaluation of conditions at the Greenbelt site under the No-action Alternative for all other resource topics in the FBI Headquarters Consolidation EIS, the transportation section analyzes a revised No-build Condition that allows a proper evaluation of transportation impacts among the various conditions. The revised No-build Condition deviates from the current developer's No-build plan in the following ways:

- 1) Only includes the amount of future development envisioned by the Greenbelt site owners if the FBI HQ is consolidated at the Greenbelt site, but without the FBI component.
- 2) Uses the roadway and intersection configuration of the Build Condition.

For more details, please see the "No-build Condition" section in section 3.10.2.

## Transportation Mitigations

The recommended traffic mitigation measures within the transportation study area would be beneficial to emergency services and life safety. Construction along approximately 4,300 linear feet of roadways requiring substantial widening, including along Edmonston Road and Powder Mill Road as shown in figure 5-47, would improve the flow of traffic and reduce response times for emergency vehicles. Therefore, impacts to emergency services/life safety associated with traffic mitigation measures would be direct, long-term, and beneficial.

### 5.2.8.2 Hazardous Materials

#### No-action Alternative

Under the No-action Alternative at the Greenbelt site, it is assumed that spill prevention and response procedures would be implemented in order to prevent spills of hazardous materials such as vehicle and equipment fuels and maintenance fluids, and the construction team would respond rapidly to any accidental spills that may occur during construction. Since there are no residual sources of contamination present on the site, the No-action Alternative would not be expected to have any potential to mobilize existing contamination into the environment. Spills and associated clean-up would result in no measurable impacts to hazardous materials under the No-action Alternative.

Following completion of construction, residential and commercial uses at the site would not be expected to generate hazardous materials. Therefore, under the No-action Alternative at the Greenbelt site, there would be no measurable long-term impacts related to hazardous materials.

#### Greenbelt Alternative

Under the Greenbelt Alternative, construction and operational activities would directly impact hazardous materials in the same manner as they would under the No-action Alternative. During operation of the facility, materials handling and storage protocols for the delivery and on-site use of hazardous materials

(for example, ammunition for the shooting range) would be implemented. Therefore, under the Greenbelt Alternative, there would be no measurable impact to hazardous materials at the Greenbelt site.

## 5.2.9 Transportation

### TRANSPORTATION ASSESSMENT OF SIGNIFICANCE

Impacts to transportation under both the No-action and Greenbelt Alternatives would result in significant impacts to traffic and public transit as defined in section 3.10. Other resources considered under transportation would not result in significant impacts.

The transportation impact analysis considers two conditions:

- No-build Condition assumes FBI remains at the FBI HQ building in Washington, D.C., and the Greenbelt site is redeveloped as a new, mixed-use development. In order to facilitate the comparison to the Build Condition, the No-build Condition at Greenbelt only includes the portion of the mixed-use development outside the site boundary.
- Build Condition is the consolidation of the FBI HQ at the Greenbelt site.

The analysis of the No-build Condition serves as the baseline against which the impacts of the Proposed Action would be compared.

### 5.2.9.1 No-build Condition

This section introduces the No-build Condition for the Greenbelt site, and provides a summary of each mode of travel and the potential impact caused if the Greenbelt Alternative does not occur. This includes descriptions of the pedestrian network, bicycle network, public transit system, parking conditions, truck access, and traffic operations.

## Planned Developments

According to the Greenbelt Site Transportation Agreement (Appendix A), four planned developments are included as part of the No-build Condition. These developments range from a small, 46,000 SF office development to a 450,000 SF office/retail, 800-unit residential, and 300-room hotel mixed-use development. The planned developments are located west of Cherrywood Lane between Greenbelt Road and I-95/I-495 as well as along Cherrywood Lane east of I-95/I-495. Table 5-25 provides the list of planned developments by name, type of construction and location as well as access and connection points.

Figure 5-36 shows the Greenbelt No-build Condition planned development locations.

## Planned Roadway Improvements

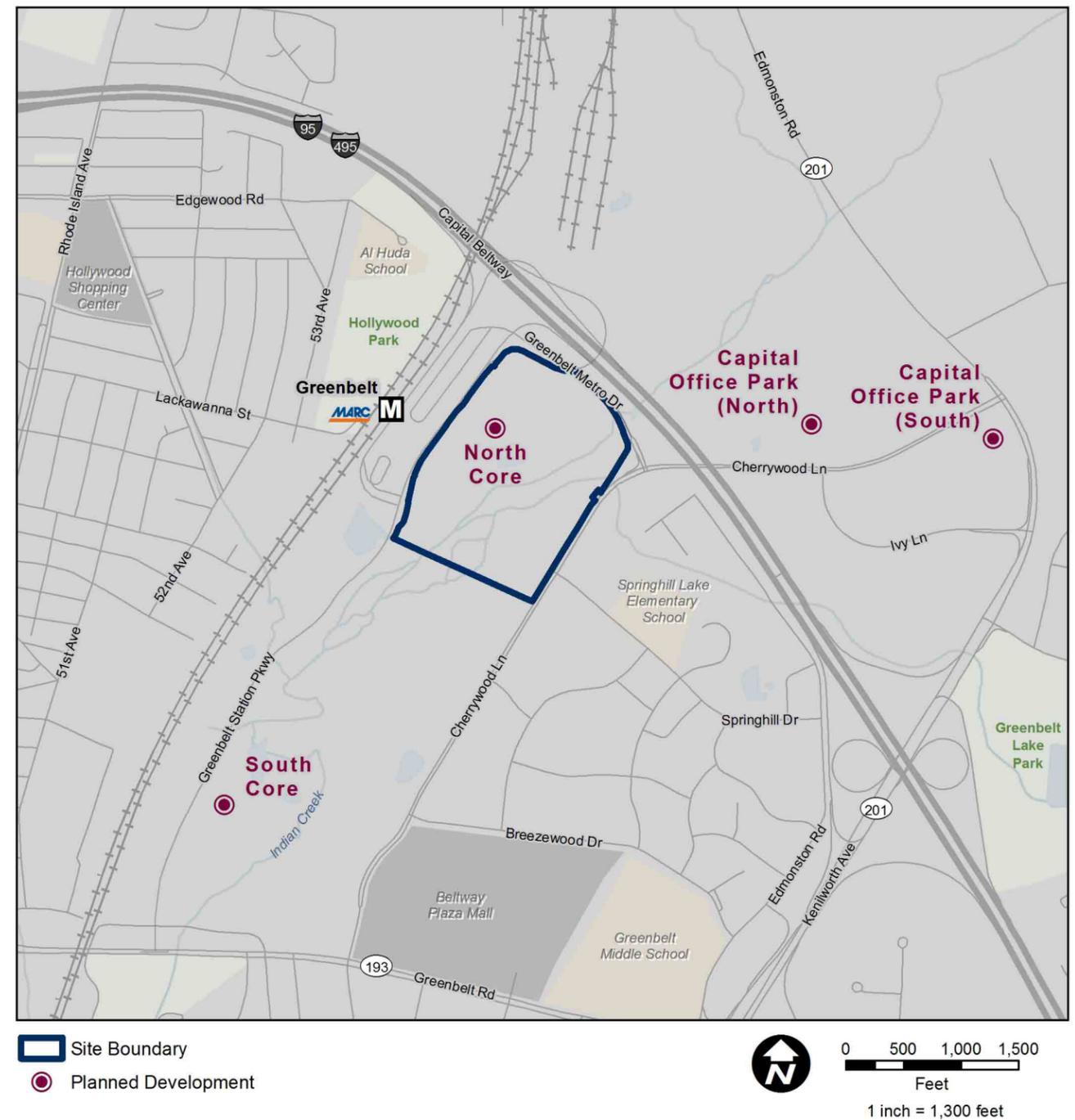
There are a number of planned roadway improvements scheduled to be constructed by the project horizon year (2022), including a new roadway system serving the Greenbelt Metro Station and the planned development between the station and Greenbelt Road and a new set of ramps connecting the station area to I-95/I-495 south. All of these improvements are part of the planned North Core and South Core developments (M-NCPPC 2005). Specific improvements were provided by Maryland SHA (ramps serving the interstate) and Renard Development Company, LLC (roadway network connecting the proposed land use to the interstate ramps and adjacent roadways). The roadways planned to serve the North and South Core developments are as follows:

**A. Greenbelt Station Parkway** would be a north-south oriented roadway connecting Greenbelt Road (MD 193) to Greenbelt Metro Drive. The road would consist of a divided roadway served by two or four lanes in the northbound direction and two lanes in the southbound direction through the North Core area. It would operate as a divided roadway with one lane in each direction with several roundabouts through the South Core area and provide a spine roadway connecting the North and South Core development areas. It would also connect to the planned WMATA parking garage and the planned or revised interstate ramps serving I-95/I-495.

Table 5-25: Greenbelt Planned Developments

Name	Type of Construction/Size	Location/Primary Access
North Core (Greenbelt Station Development)	350,000 SF office, 100,000 SF retail, 800 units of apartments, and a 300-room hotel planned to replace the western side of the existing Greenbelt Metro station parking/bus loops, Kiss & Ride area	West side of Greenbelt Station Parkway between Greenbelt Metro Drive and South Core. The primary access would be from the planned Greenbelt Station Parkway.
South Core (Greenbelt Station Development)	180,120 SF retail, 550 units of apartments, and 350 units of townhouses located between the existing Greenbelt Metro station parking area and Greenbelt Road	Both sides of Greenbelt Station Parkway between Greenbelt Road and North Core. The primary access would be from the planned Greenbelt Station Parkway.
Capital Office Park (North of Cherrywood Lane)	300,000 SF office located north of Cherrywood Lane east of I-95/I-495	North side of Cherrywood Lane at the Ivy Lane intersection. The primary access to the development would be from the Cherrywood Lane at Ivy Lane intersection.
Capital Office Park (South of Cherrywood Lane)	46,000 SF office located south of Cherrywood Lane east of I-95/I-495 near the southwest corner of the Kenilworth Avenue/Edmonston Road at Cherrywood Lane intersection	South of Cherrywood Lane between Ivy Lane and Kenilworth Avenue. The primary access to the development would be from Cherrywood Lane.

Figure 5-36: Greenbelt No-build Condition Planned Development Locations



Sources:  
ESRI (2013), GSA (2013)

**B. Greenbelt Metro Drive** is an east-west oriented roadway that would be realigned from its current path to connect to Greenbelt Station Parkway. It would primarily operate as a two-lane undivided roadway and continue to provide a connection between Cherrywood Lane and Greenbelt Station.

**C. I-95/I-495 Off-ramps** would follow a similar alignment as the existing off-ramp and would directly connect to the WMATA garage, the Kiss & Ride area, and Greenbelt Station Parkway. A new two-lane flyover ramp would be constructed between I-95/I-495 northbound and connect to the existing I-95/I-495 southbound off-ramp ramp.

**D. I-95/I-495 Southbound On-ramp** would originate at the proposed Greenbelt Station Parkway and Greenbelt Metro Drive intersection and connect to I-95/I-495 southbound. It would begin as a two-lane ramp and reduce to one lane before merging onto the interstate.

**E. I-95/I-495 Northbound On-ramp** would originate immediately south of the proposed Greenbelt Station Parkway and Greenbelt Metro Drive intersection and follow a horseshoe curve crossing over Greenbelt Metro Drive and I-95/I-495 connecting to the existing on-ramp. It would begin as a two-lane ramp and reduce to one lane before merging onto the interstate.

The new system of roadways would create seven new intersections through the North Core area, two roundabouts through the South Core area, and a new intersection along Greenbelt Road (MD 193). These intersections would be as follows:

**F. Greenbelt Road (MD 193) and Greenbelt Station Parkway** would include a new, 350-foot eastbound double left-turn lane and a new 150-foot westbound right-turn lane. The Greenbelt Station Parkway southbound approach would be composed of three lanes, two left-turn lanes (far left lane would be 225 feet) and a 225-foot right-turn lane. There would continue to be three through lanes for both directions of Greenbelt Road.

**G. Greenbelt Station Parkway and Residential Access to 300 Units** would include a two-lane northbound approach (Greenbelt Station Parkway) with one shared left-turn/through lane and one through lane, a two-lane southbound approach (Greenbelt Station Parkway) with one through lane (originating from the WMATA garage) and a shared through/right-turn lane, and a one-lane eastbound approach (residential Access to 300 Units) serving all moves. This intersection would be unsignalized with a STOP sign placed on the eastbound approach.

**H. Greenbelt Station Parkway and WMATA Garage** would include a two-lane northbound approach (Greenbelt Station Parkway) with one shared left-turn/through lane and one shared through/right-turn lane, a two-lane southbound approach (Greenbelt Station Parkway) with one through lane and one right-turn lane, and a two-lane eastbound approach (WMATA Garage) with one 150-foot left-turn lane and one right-turn lane. This intersection would be signalized.

**I. Greenbelt Station Parkway and I-95/I-495 Off-ramp/Kiss & Ride area/Site South Access** would include four approaches and a fifth departing segment. The northbound approach (Greenbelt Station Parkway) would have three lanes, one 375-foot left-turn lane and two through lanes. Two through lanes would originate from the WMATA garage along a parallel northbound approach immediately to the right of Greenbelt Station Parkway. The southbound approach (Greenbelt Station Parkway) would have a 400-foot left-turn/U-turn lane, one through lane, and one shared through/right-turn lane. The eastbound approach (I-95/I-495 Off-ramp) would have one left-turn lane, one shared left-turn/through lane, and one shared through/right-turn lane. The southeast approach (Kiss & Ride area) would have one lane serving all moves. There would also be three lanes departing the intersection to the east serving the Greenbelt site. This intersection would be signalized.

**J. Greenbelt Station Parkway and Residential Access to 500 Units** would include a two-lane southbound approach (Greenbelt Station Parkway) with one through lane and a shared through/right-turn lane, and a one-lane eastbound approach (Residential Access to 500 Units) serving right-turns only. This intersection would be unsignalized with a STOP sign placed on the eastbound approach.

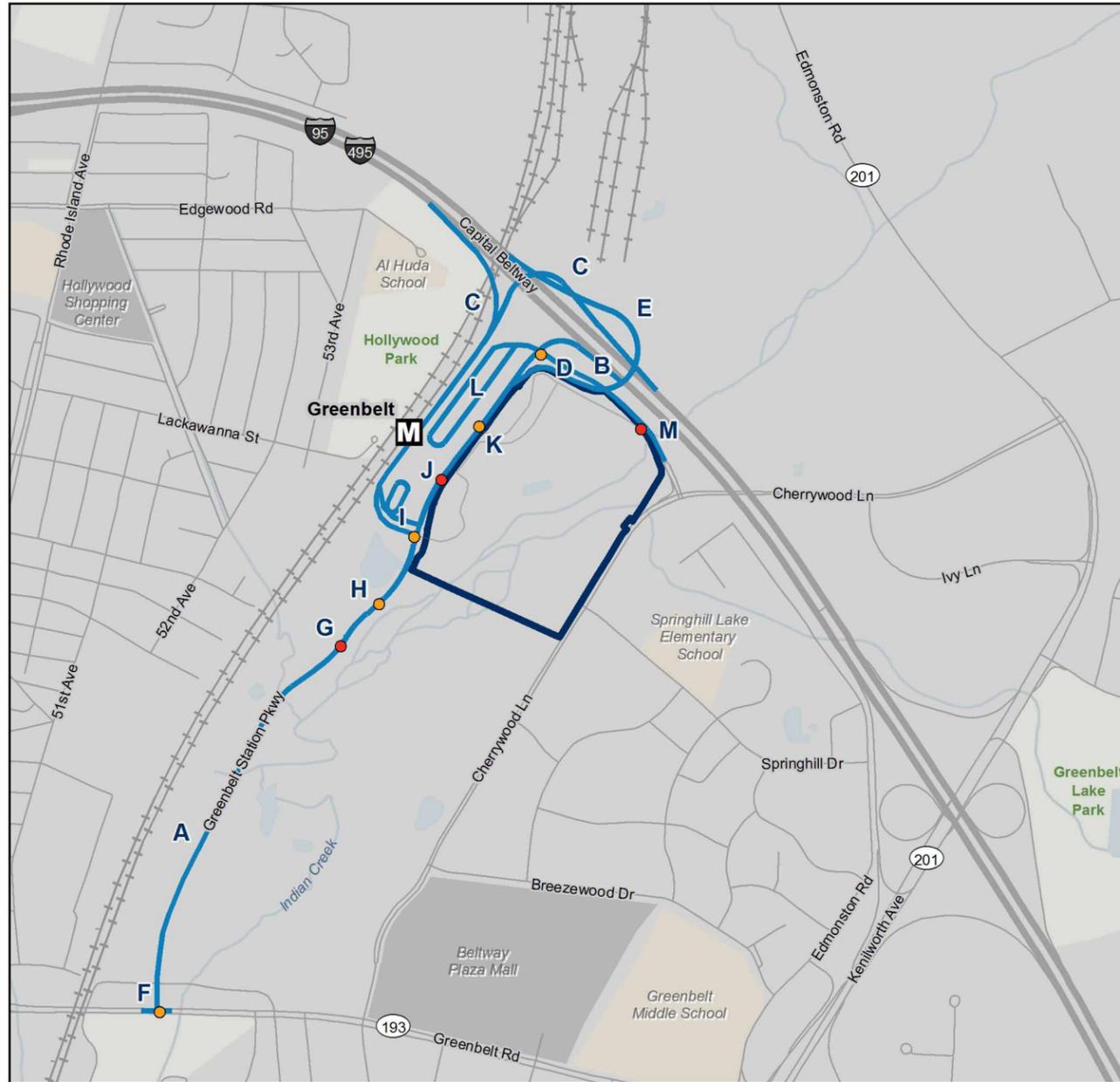
**K. Greenbelt Station Parkway and North Core Development/Site Northwest Access** would include a four-lane northbound approach (Greenbelt Station Parkway) with one left-turn lane, two through lanes and one shared through/right-turn lane, a two-lane southbound approach (Greenbelt Station Parkway) with one through lane and one shared through/right-turn lane, and a three-lane eastbound approach (North Core Development) with two left-turn lanes and one right-turn lane. This intersection would be signalized.

**L. Greenbelt Station Parkway and Greenbelt Metro Drive/Bus Loop** would include a four-lane northbound approach (Greenbelt Station Parkway) with a 250-foot left-turn lane, two through lanes and one right-turn lane, a two-lane eastbound approach (Bus Loop) with one left-turn/through lane and one right-turn lane, and a three-lane westbound approach (Greenbelt Metro Drive) with one left-turn/U-turn lane, one through lane and one right-turn lane. This intersection would be signalized.

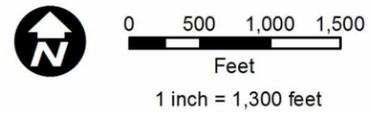
**M. Greenbelt Metro Drive and Site North Access** would be an intersection for use with the Build Condition, but was included as part of the design provided by Renard Development Company, LLC. The design includes three lanes for the northbound approach from the Greenbelt Site. For the eastbound approach, one lane would serve all moves, and the westbound approach would include a 150-foot left-turn lane and a through lane.

Figure 5-37 shows the No-build Condition planned roadway improvements. See figure 5-38 for the No-build Condition intersection map and the Greenbelt TIA for the updated lane geometry of the study area intersections (Appendix C).

Figure 5-37: No-build Condition Greenbelt Planned Roadway Improvements

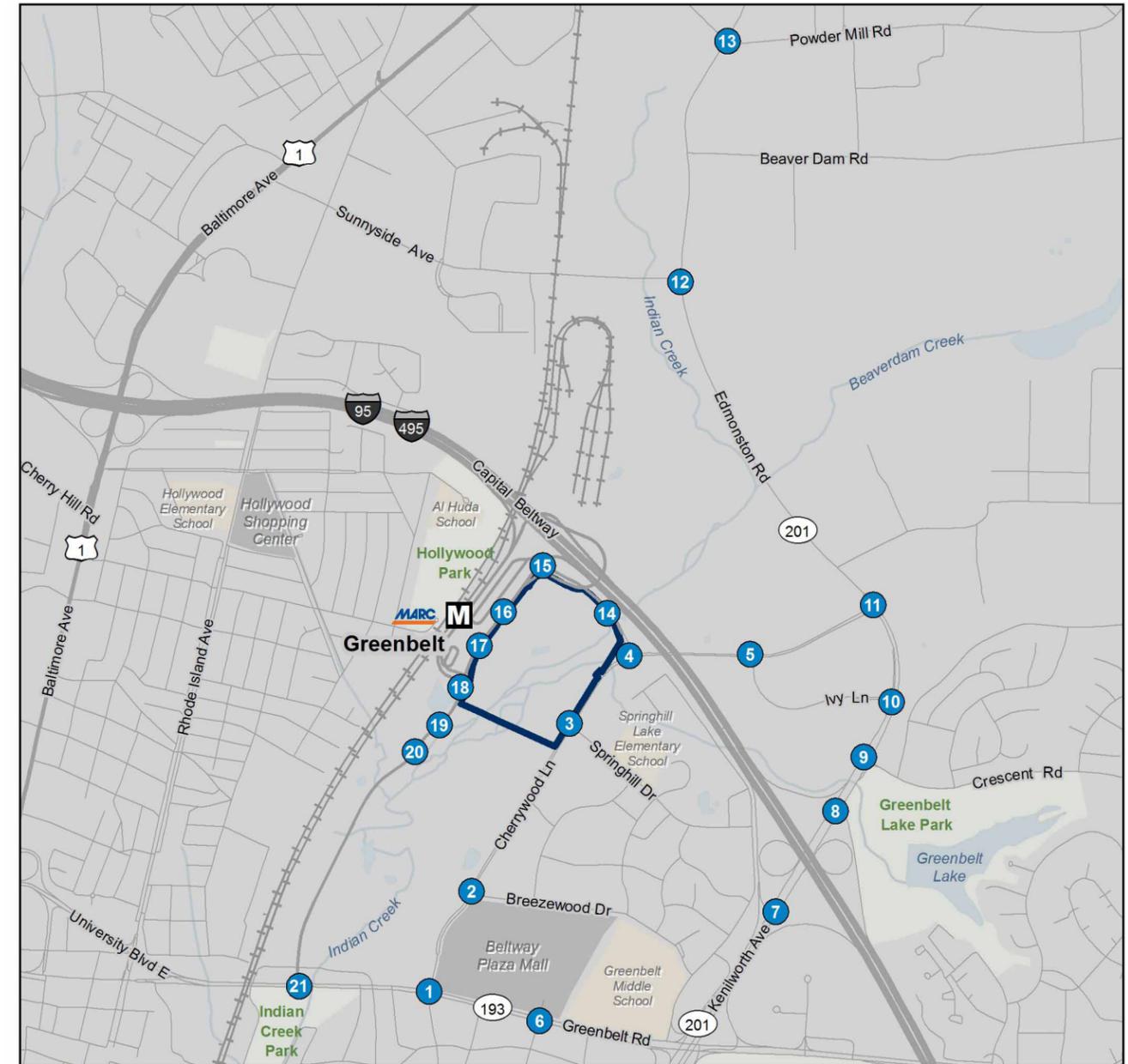


- Site Boundary
- Roadway Improvements
- Intersection Improvements (Signalized)
- Intersection Improvements (Unsignalized)

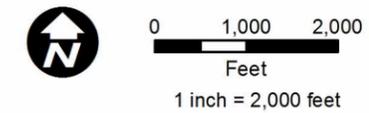


Sources:  
ESRI (2013), GSA (2013)  
Prince George's County (2013)

Figure 5-38: No-build Condition Intersection Map



- Site Boundary
- Study Intersection



Sources:  
ESRI (2013), GSA (2013)  
Prince George's County (2013), Louis Berger (2015)

Table 5-26: Proposed Bicycle Facilities in the Greenbelt Study Area

Roadway	From/To	Type	Future Status	Notes
Indian Creek	Greenbelt Road to Greenbelt Metro Station/Cherrywood Lane	Multi-Use Path	Proposed	Adjacent to site; similar alignment also proposed as part of the North Core development
Edmonston Road	Cherrywood Lane to Greenbelt Road	Multi-Use Path	Proposed	-
Cherrywood Lane	Breezewood Drive to Greenbelt Road	Bicycle Lane	Proposed	-
Breezewood Drive	Cherrywood Lane to Edmonston Road	Bicycle Route	Proposed	-
Springhill Drive	Cherrywood Lane to Edmonston Road	Bicycle Route	Proposed	-
Lackawanna Street	US-1 to 53rd Avenue	Bicycle Route	Proposed	-
Hollywood Road	US-1 to Narragansett Parkway	Bicycle Route	Proposed	-
Greenbelt Station Parkway	Greenbelt Road (Route 193) to Greenbelt Metro Drive	Bicycle Lane	No-build Condition	Proposed as part of the North Core development
Greenbelt Metro Drive*	Greenbelt Station Parkway to Cherrywood Lane	Multi-use Path	No-build Condition	Proposed as part of the North Core development

Source: Prince George's County (2009); M-NCPPC (2014)

Note: \*Although Greenbelt Metro Drive already has a multi-use path, with redevelopment of the North Core it is assumed at least a portion of this roadway and the associated mixed-use path would be reconstructed.

### No-build Condition Pedestrian Network

While the design and layout of the pedestrian network is not finalized, the No-build Condition pedestrian system would be convenient and comprehensively designed to encourage pedestrian activity within the development and to mass transit (M-NCPPC 2014). Pedestrian areas and public spaces would have high-quality urban design and amenities such as landscaping, street furniture, and lighting. Pedestrian crossings would be provided at all intersections along Greenbelt Station Parkway, the North-South connector road between the North and South Core development areas, unless waived by the appropriate agency. In addition, an east-west trail connection between Cherrywood Lane and Greenbelt Station Parkway and a north-south pedestrian/bike trail would be constructed; the latter would provide a direct connection between the North and South Core areas and connect the Greenbelt Metro Station to the South Core area. A direct pedestrian connection is also proposed from the Greenbelt Metro Station to the office development planned on the east side of the roadway; this connection would provide more direct access for pedestrians and increase safety by creating special attention to pedestrian crossings at-grade. All of these improvements may not be complete by 2022 because the development would be staged, but significant improvements to the pedestrian environment at and around the site are planned with the Greenbelt Station project development.

Additionally, according to the Maryland Department of Transportation (DOT)/SHA's 2015-2020 Transportation Improvement Program, several regional and Prince George's County funding categories include funds for sidewalk, signing, lighting, pedestrian crossing, safety improvements, ADA improvements or retrofits, and/or traffic management improvements to benefit pedestrians. Specific details are not available about what projects would receive these funds, but areas within the non-vehicular study area could receive improvements as a result.

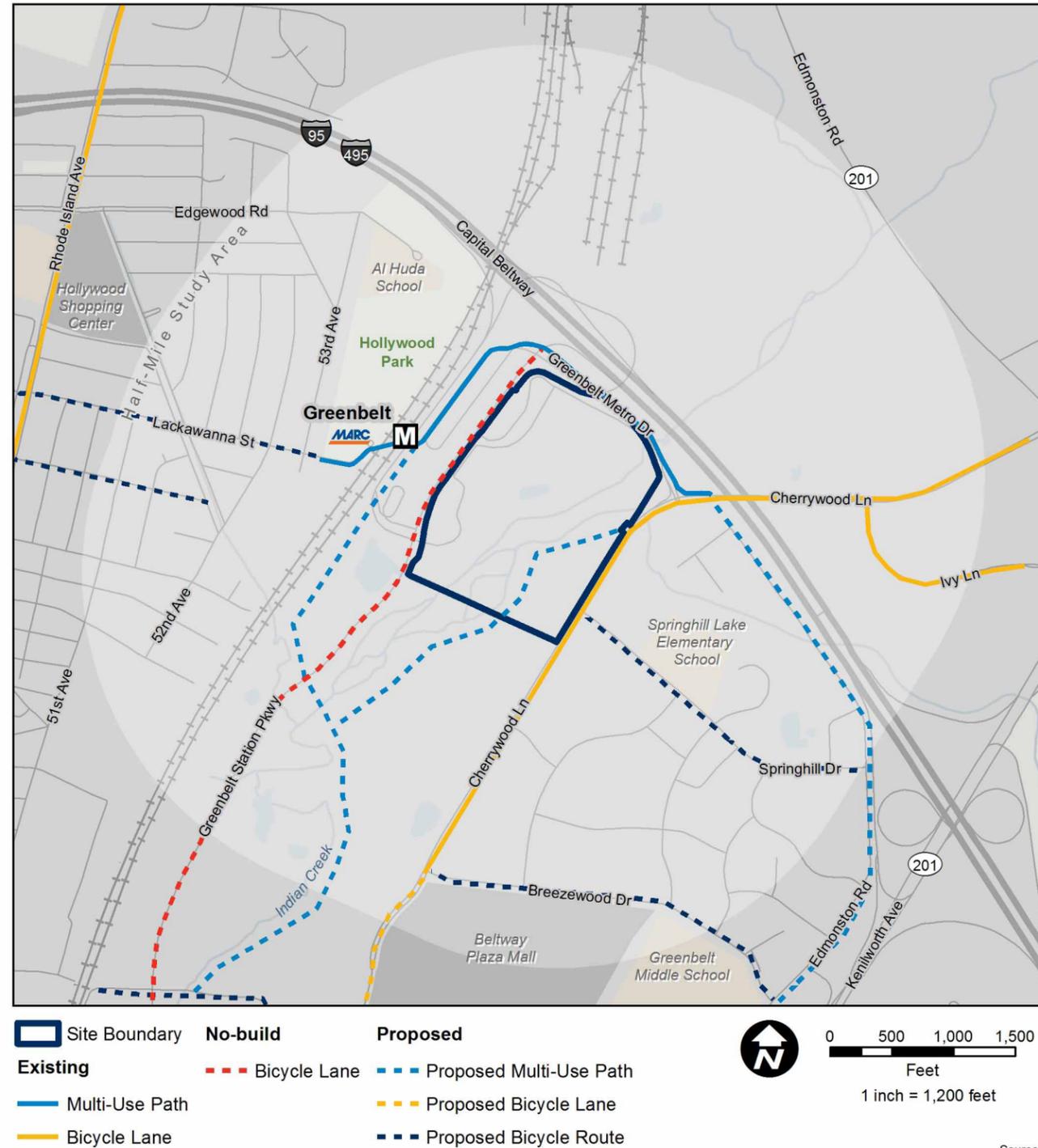
With the development proposed with the Greenbelt Station project (North and South Cores) and annual transit growth, the amount of pedestrian traffic in the area would increase. The improvements planned with Greenbelt Station, however, should accommodate any increases in pedestrians and improve the overall pedestrian environment around the site. Under the No-build Condition, assuming planned improvements are implemented for the Greenbelt Station project, impacts to pedestrians would be direct, long-term, and beneficial. The planned pedestrian improvements would have a beneficial impact by creating spaces specifically designed for pedestrians and to improve pedestrian safety. The proposed Greenbelt Station improvements would also increase the overall walkability and pedestrian connections in the area around the site.

### No-build Condition Bicycle Network

The Prince George's County Bicycle Master Plan (Prince George's County 2009) recommends several bicycle facilities within the Greenbelt study area (see table 5-26 and figure 5-39). Overall, two new multi-use paths, one bicycle lane, and four bicycle routes are recommended. Bicycle routes are roadways with signed bicycle route designations or shared lane arrow pavement markings (sharrows), but not actual marked bicycle lanes. Directly adjacent to the proposed site, the plan recommends a multi-use path along Indian Creek, connecting to Greenbelt Road and Cherrywood Lane. There is no dated implementation plan included in the Master Plan, and therefore, it is not clear whether any of these recommendations would be implemented by 2022. Therefore, these improvements are shown as "proposed" in both table 5-26 and figure 5-39.

In addition to the planned County improvements, the developer of the Greenbelt Station project has committed to construct several bicycle features in the North Core area around the site (M-NCPPC 2014). These improvements include bicycle lanes along Greenbelt Station Parkway, a north-south pedestrian/bike trail providing a connection between the North and South Cores and the Metrorail station, and an east-west trail connection between Cherrywood Lane and Greenbelt Station Parkway, at this point assumed to be along Greenbelt Metro Drive (figure 5-39). Since Greenbelt Station Parkway and at least some portions of Greenbelt Metro Drive are assumed to be constructed or reconstructed as part of the No-build Condition, in order to have a comparable road network to the Build Condition, it is assumed that the bicycle facilities adjacent to these roadways would also be completed at that time. Therefore, the Greenbelt Station Parkway bicycle lane and the Greenbelt Metro Drive mixed-use path would be constructed, or existing, as part of the No-build Condition, and there would be indirect, long-term, beneficial impacts to the bicycle network as part of the No-build Condition. However, all of these improvements may not be complete by 2022 because the development would be staged.

Figure 5-39: Proposed Greenbelt Area Bicycle Facilities



Sources:  
ESRI (2013), GSA (2013), Prince George's County (2013)  
Google Maps (2015), Louis Berger (2014), M-NCPPC (2014)

**GREENBELT PEDESTRIAN ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-build Condition:** Indirect, long-term, beneficial impacts.

**GREENBELT BICYCLE NETWORK ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-build Condition:** Indirect, long-term, beneficial impacts.

Table 5-27: Greenbelt Projected Trips Associated with Planned Development Projects

Period	Total Non-SOV Trips Per Hour			Metrorail Proportion of Non-SOV	Metrorail Passenger Trips Per Hour			Peak Hour Factor	Metrorail Passenger Trips Per 15-Minute		
	IN	OUT	TOTAL		Exits	Entries	Total		Exits	Entries	Total
AM Peak	262	240	502	47.58%	125	114	239	27.72%	35	32	66
PM Peak	300	330	630	47.58%	143	157	300	28.02%	40	44	84

Source: WMATA (2014b)

### No-build Condition Public Transit

The following sections describe the No-build Condition for the Metrorail and bus modes within the Greenbelt study area.

#### Projected Transit Growth

Growth in the transit mode was calculated for the year 2022 using regional transit growth rates and projected ridership associated with large planned developments in proximity to the site. Refer to section 3.10.4.3 for more detailed information about the Metrorail and bus growth calculations.

There are several planned projects located in proximity to the Greenbelt site with associated transit trips, including the North Core and South Core developments. Transit trips associated with these developments were calculated based on ITE trip generation rates and the transit mode split determined in the Greenbelt Site Transportation Agreement (Appendix A). Prince George's County agreed to a non-SOV credit between 10 and 45 percent for these developments (see trip generation in Appendix C, section 4.8, Traffic Analysis, for more details). The non-SOV trips were further disaggregated (divided) into bus trips and Metrorail trips using bus and subway proportions from the 2009-2013 American Community Survey (U.S. Census Bureau 2009-2013) means of transportation data for the census tract containing the study area. The American Community Survey is an on-going annual sampling of demographic data across the U.S. conducted by the U.S. Census Bureau. The resulting bus and Metrorail trips were added to the projected background growth.

### Metrorail Analysis

The Metrorail analysis was conducted using projected ridership growth in the system at the Greenbelt Metro Station and ridership projected for planned development projects in the study area.

### Ridership Growth from Planned Projects

As previously mentioned, additional transit trips associated with the North Core and South Core developments were added to future projected ridership at the Greenbelt Metro Station. The peak hour non-SOV trips associated with the developments (see Appendix C, section 4.5.1, Projected Transit Growth) were disaggregated into peak hour Metrorail trips using the subway proportion from the 2009-2013 American Community survey (U.S. Census Bureau 2009-2013) means of transportation data for the census tract containing the development. The peak hour Metrorail passenger trips were then disaggregated into peak AM and PM 15-minute totals using the current AM and PM peak hour factors (PHF) at the station (WMATA 2014a). A PHF is the proportion of peak hour ridership that occurs during the peak 15-minute period in that hour. The additional Metrorail trips associated with the North Core and South Core development are summarized in table 5-27. AM peak 15-minute ridership is used in the station platform and fare vending capacity analysis. PM peak 15-minute ridership is used in the station vertical and faregate aisle capacity analysis, the passenger load analysis, and the emergency evacuation (National Fire Protection Association [NFPA] 130) analysis. Each represents the peak use.

**Regional Transit Growth Rate**

Background ridership growth at Greenbelt Metrorail Station for 2022 was calculated based on the 2.1 percent Metrorail growth rate from the MWCOG travel demand model. Table 5-28 summarizes projected 2022 weekday entries at the station, including background growth and growth from planned projects. Average weekday exits would theoretically be the same or similar to average weekday entries.

**Metrorail Passenger Loads**

Refer to section 3.10.4.3 for a detailed explanation of how Metrorail passenger loads were calculated. At Greenbelt Metro Station under No-build Conditions, the AM peak period entries were used to calculate loads, since they were the highest of AM peak entries, AM peak exits, PM peak entries, and PM peak exits, and therefore would result in the highest passenger load. Projected passenger loads by 2022 are below 100 passengers per car, and therefore would be considered acceptable. Table 5-29 summarizes passenger loads per car in 2022 under the No-build Condition using AM peak 15-minute entries.

**Station Capacity Analysis**

Refer to section 3.10.4.3 for a detailed description of how station capacity was analyzed. Table 5-30 summarizes ridership growth during the peak exiting periods at the Greenbelt Metro Station.

Table 5-28: Weekday No-build 2022 Projected Metrorail Ridership at Greenbelt Metro Station

Station	Average Weekday Entries			
	2014	2022 with Background Growth	2022 Planned Development Projects	2022 Total No-build
Greenbelt	6,098	7,185	271	7,456

Source: Greenbelt Site Trip Generation Summary, WMATA, (2014b); MWCOG (2015)

Table 5-29: Projected Maximum Metrorail Passenger Loads at Greenbelt Metro Station

Measure (AM Peak 15-Minute Entries)	Unit
2014 Maximum 15-minute Passengers	361
2022 Passengers with Background Growth	426
2022 Passengers with Development Projects	32
2022 Total No-build Passengers	458
2022 Minimum Trains <sup>a</sup>	3
2022 Train Cars <sup>b</sup>	18
2022 Maximum Passengers Per Car	25

<sup>a</sup> A 4-minute headway equates to 3.75 trains every 15 minutes. This figure was rounded down to 3 minutes to provide the most conservative load estimate.

<sup>b</sup> Assuming three 6-car trains at Greenbelt.

Source: WMATA (2014b); MWCOG (2015)

Table 5-30: Greenbelt Weekday Peak 15-Minute Exiting Period Ridership Growth

Metro Station	Time	2014		2022 No-build	
		Entries	Exits	Entries	Exits
Greenbelt	5:00 PM – 5:15 PM	55	353	109	456

Source: WMATA (2014b)  
MWCOG (2015)

**GREENBELT PUBLIC TRANSIT ENVIRONMENTAL CONSEQUENCES SUMMARY**



**No-build Condition:** No measurable impacts to public transit capacity. Indirect, long-term, major adverse impacts to bus operations in the Greenbelt study area.

Table 5-31: Greenbelt Weekday Peak 15-Minute Entering Period Ridership Growth

Metro Station	Time	2014		2022 No-build	
		Entries	Exits	Entries	Exits
Greenbelt	7:15 AM – 7:30 AM	361	36	458	77

Source: WMATA (2014b); MWCOG (2015)

Table 5-32: Greenbelt Projected Bus Passenger Trips Associated with Greenbelt North Core and South Core Developments

Period	Total Non-SOV Trips Per Hour			Bus Proportion of Non-SOV	Bus Passenger Trips Per Hour		
	IN	OUT	TOTAL		IN	OUT	TOTAL
AM Peak	262	240	502	7.06%	18	17	35
PM Peak	300	330	630	7.06%	21	23	44

Note: Values may not appear to calculate correctly due to rounding.

Source: Greenbelt Site Transportation Agreement (Appendix A); U.S. Census Bureau (2009-2013)

Table 5-33: Current and Projected Bus Capacity Analysis in the Greenbelt Study Area

Measure	2014		2022 Background Growth		2022 Planned Development Projects		2022 Total No-build	
	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak	AM Peak	PM Peak
Total Volume	671	654	778	758	35	44	813	803
Total Capacity	1,337	1,273	1,337	1,273	256	336	1,593	1,609
Volume to Capacity Ratio (V/C)	0.50	0.51	0.58	0.60	-	-	0.51	0.50

Sources: WMATA (2014a);

MWCOG (2015); Greenbelt Site Trip Generation Summary

Table 5-31 summarizes ridership growth during the peak entering period at Greenbelt Metro Station.

Overall, vertical elements (escalators and stairs), faregate aisles, and fare vending machines at Greenbelt Metro Station are projected to operate within capacity, or below a v/c of 0.7. Additionally, platform peak pedestrian LOS (based on the available spacing between passengers) on the busiest platform sections are projected to be at the acceptable LOS B. Further details on the station capacity analysis and emergency evacuation analysis are found in the Greenbelt TIA (Appendix C).

#### Bus Analysis

As a part of the North Core and South Core planned developments, six additional AM peak hour bus trips and eight additional PM peak hour bus trips are planned to be added to existing bus services within the study area (see Appendix C, section 4.8, Trip Generation for more details). This would result in an additional passenger capacity of 256 passengers during the AM peak hour and 336 passengers during the PM peak hour. The overall analysis was limited to Metrobus service because no ridership data were available for TheBus, and the Central Maryland RTA G route only serves Greenbelt Metro Station on weekends. It can be assumed, however, that TheBus would see some minor increases in ridership on routes that serve the site.

To calculate peak hour bus volumes within each study area, the 2014 maximum weekday passenger loads for each route and direction at stops within the study area were averaged by stop; this figure was then multiplied by the number of peak trips per hour to calculate ridership per peak hour by route and direction. These totals were grown to the year 2022 using the 1.9 percent annual regional growth rate for the bus mode. The 2022 totals were then summed to calculate a total ridership per peak hour for the study area.

The peak hour non-SOV trips associated with the North Core and South Core developments (see Appendix C, section 4.5.1, Projected Transit Growth) were disaggregated into peak hour bus passenger trips using the bus mode proportion from the 2009-2013 American Community Survey (U.S. Census Bureau

2015) means of transportation data for the census tract containing the development. This additional ridership, approximately 35 AM peak hour passengers and 44 PM peak hour passengers (see table 5-32), was then added to each route and direction proportionally based on existing ridership.

To calculate the peak hour capacity of bus services within the study area, the capacity per trip of each bus route during the peak hour was multiplied by the number of trips scheduled in the peak hour. Capacities per trip for each Metrobus route were based on the typical number of seats available on each trip and the WMATA load standard (WMATA 2013a). The additional capacity associated with the six additional AM peak hour and eight additional PM peak hour bus trips planned with the North Core and South Core developments was then added to the overall study area capacity (Renard 2014). This was done by adding additional bus trips per peak hour to the route/directions with the most severe capacity issues (Routes 87 north, 87 south, 89 north, 89 south, 89M south, C2 east, G13 west, R11 north, and R12 south, see Appendix C for more details).

Total 2014 peak hour bus ridership (Existing Condition) and projected 2022 peak hour bus ridership (No-build Condition) are summarized in table 5-33. The 2014 and No-build 2022 bus ridership are below the calculated capacity of current and future projected bus services in the study area, meaning the additional passenger trips projected can be adequately handled by current service levels.

Even though the study area as a whole would not be over capacity, several individual routes are projected to have capacity issues, including Routes 87, 89, and 89M. However, the capacity issues on these routes would be alleviated with the addition of the planned bus trips associated with the North Core and South Core developments. Additionally, WMATA has completed studies of Routes 87, 89, 89M, and C2. Certain recommendations from these studies have already been implemented, and are all intended to help alleviate overcrowding on these routes. Further analysis would be required to determine the extent to which the recommendations would impact capacity on these routes. Specific recommendations from WMATA's studies to improve bus capacity are found in Appendix C.

The Greenbelt TIA (Appendix C) contains the Greenbelt Metro Station bus bay analysis and further details on the bus capacity analysis.

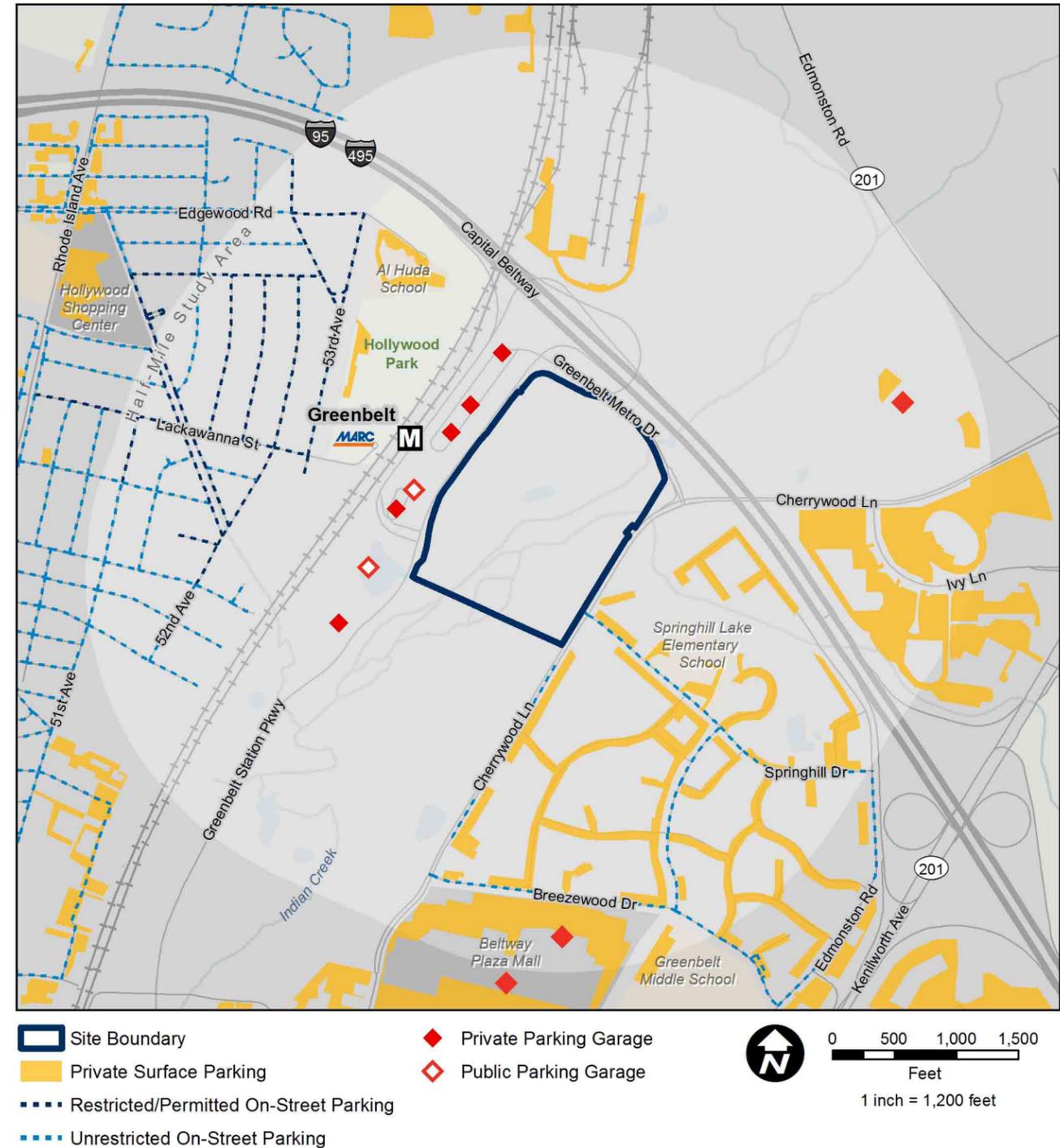
### No-build Condition Parking

Parking is proposed in several garages in the North Core area, including a parking garage to replace the current WMATA surface parking for Greenbelt Metro Station users. According to documents submitted by developers during the consolidated FBI HQ site selection process, there would be approximately 4,200 parking spaces in the new Greenbelt Metro Station garage. It is anticipated that this number of spaces would accommodate demand, since it is a substantial increase from the current number of parking spaces at the Metrorail station. On-street parking may also be part of the future development; if so, locations would be determined during the detailed site plan review process. Parking as currently proposed for the No-build Condition would be as shown in figure 5-40. While the total number of parking spaces for the Greenbelt Station project is not yet known, the development would be required to provide adequate parking for all portions of the development as determined by M-NCPPC requirements (M-NCPPC 2014).

**GREENBELT PARKING ENVIRONMENTAL CONSEQUENCES SUMMARY**

**No-build Condition:** Indirect, long-term, beneficial impacts.

Figure 5-40: Greenbelt No-build Condition Parking



Sources:  
ESRI (2013), GSA (2013)  
Prince George's County (2013), Google Maps (2015), Louis Berger (2015)

Table 5-34: Planned Development and WMATA Trip Generation Summary

PROJECT	AM Peak Hour Trips			PM Peak Hour Trips		
	IN	OUT	TOTAL	IN	OUT	TOTAL
North Core (West side of Greenbelt Station Parkway)						
TOTAL VEHICLE TRIPS	429	256	685	338	463	801
South Core						
TOTAL VEHICLE TRIPS	164	427	591	456	338	794
Capital Office Park (North of Ivy Lane)						
TOTAL VEHICLE TRIPS	415	46	461	78	336	414
Capital Office Park (SW Corner of Cherrywood Lane and MD 201)						
TOTAL VEHICLE TRIPS	83	9	92	16	69	85
Greenbelt Station Kiss and Ride						
TOTAL VEHICLE TRIPS	48	59	107	55	44	99
Greenbelt Station Bus Service						
TOTAL VEHICLE TRIPS	6	6	12	8	7	15
Greenbelt Station Parking Garage						
TOTAL VEHICLE TRIPS	82	3	85	6	61	67

**GREENBELT TRUCK ACCESS  
ENVIRONMENTAL CONSEQUENCES  
SUMMARY**

**No-build Condition:** No measurable impacts.

**No-build Condition Truck Access**

Truck access routes would use the new roadway and access points determined through the detailed site plan process with Prince George's County and M-NCPPC. The roadways and access points would be designed to safely and adequately provide truck access to the No-build development.

**No-build Condition Traffic Analysis**

According to the Greenbelt Site Transportation Agreement (Appendix A), the future No-build traffic volumes relied on two primary sources, Maryland SHA and M-NCPPC, which provided the background growth rates, planned roadway improvements, and approved list of planned developments.

The following section describes the process for analyzing traffic for the No-build Condition and the results of the analysis.

**Background Growth**

Refer to section 3.10.4.3 for a detailed description of background growth and how it was calculated. As agreed in the Greenbelt Site Transportation Agreement, a 0.33 annual growth rate was selected for all non-interstate roadways, excluding the newly planned roadways serving the North Core, South Core, and Greenbelt Metro Station (Site Transportation Agreement, Appendix A). These excluded roadways had a separate growth process that would result in double counting if the background growth rate were included.

**Development of Existing Vehicle Volumes through Proposed North and South Core Roadway Network**

The next consideration within the No-build Condition analysis involved modeling the redistribution of vehicle volume in conjunction with the planned roadway improvements. The process of populating the proposed North Core and South Core roadways with the existing Greenbelt Metro Station vehicle volumes (WMATA-based trips) required several steps. The WMATA-based trips were first extended through the proposed roadways. The percentage shift in WMATA-based trips to and from I-95/I-495 South was then calculated. Lastly, the WMATA-based trips were shifted. The Greenbelt TIA (Appendix C) contains the detailed step-by-step process for populating the proposed North Core and South Core roadways with the existing Greenbelt Metro Station vehicle volumes.

**Trip Generation/Modal Split**

The process to add each development for the No-build Condition followed the M-NCPPC/Prince George's County guidelines by using the County's prescribed trip generation formulas (M-NCPPC 2012). Depending on the type of development and size, the trip generation either relied on the Prince George's County trip rates or ITE trip rates. Prince George's County supplies trip rates for a number of typical land uses such as office and residential. The Greenbelt TIA (Appendix C) contains the trip generation rates used to cover the planned developments.

Table 5-34 presents the planned development and WMATA trip generation summary. A more detailed trip generation summary is contained in the Greenbelt TIA (Appendix C).

### Cut-through Traffic

In addition to the planned developments, the WMATA-based trip growth and the forecasted cut-through traffic (traffic from adjacent areas both inside and outside the study area that would be expected to change their travel pattern to access I-95/I-495 using the new available roadway connections) was calculated.

The cut-through traffic would be a result of the connection provided by the new set of roadways between Greenbelt Road/Cherrywood Lane and I-95/I-495. These new connections would provide an alternative to using the existing U.S. Route 1 and Kenilworth Avenue interchanges to access I-95/I-495. The Greenbelt TIA (Appendix C) contains the detailed steps to incorporate the cut through traffic.

### Trip Distribution

Once the total number of new vehicle trips was calculated through the trip generation process, the trips were systematically and logically distributed across the road network. This is typically a straightforward process, emulating the existing travel patterns on roadways. However, in this case, with new developments and new roadways introduced as part of the No-build Condition, the process required several additional steps to complete including the following:

1. Add the planned development trips.
2. Add the growth in Greenbelt Metro Station trips (WMATA garage and Kiss & Ride).
3. Add the growth in buses serving the Greenbelt Metro Station.
4. Add the background growth rate trips.
5. Add the cut-through vehicle trips.

### Planned Development Trip Distribution

The planned developments included the North and South Core developments, plus the two Capital Office Park developments. The study followed the North Core distribution values based on the Greenbelt WMATA, Mixed-Use, and FBI HQ Study for the North and South Core planned land uses and MWCOC travel demand model trip tables from the Travel Demand Model Version 2.3.52 for 2020 for the Capital Office Park developments (Renard 2014; MWCOC 2014).

The Greenbelt WMATA, Mixed-Use, and FBI HQ study provided distributions for office, retail, hotel, and residential uses. Because the South Core development is in proximity to the North Core, the same distribution patterns were followed except for trips destined to Kenilworth Avenue to the south. It was assumed that these trips would use Greenbelt Road to access Kenilworth Avenue rather than Cherrywood Lane.

Trip tables from the 2020 model were obtained from MWCOC representing all trips originating at home for all purposes such as work or shopping. A transportation analysis zone (TAZ), which is the smallest geographical unit within a travel demand model, was selected to capture the travel patterns to and from office uses. TAZ 893, representing a 2020 forecast of 3,299 jobs, is located between Sunnyside Avenue and I-95/I-495. This zone represents the largest employment adjacent to the Greenbelt site TAZ.

Table 5-35 contains the distribution percentages for each planned development. Appendix C contains maps showing the distribution patterns for each planned development.

The Greenbelt TIA (Appendix C) contains the detailed steps to distribute the future forecasted WMATA-based trips, new bus trips, and cut-through trips.

Table 5-35: Planned Development Trip Distribution

Origin / Destination	North Core				South Core		Capital Office Park
	Office	Residential	Retail	Hotel	Residential	Retail	Office
I-95/I-495 North	35%	30%	10%	50%	30%	10%	31%
I-95/I-495 South	30%	30%	10%	50%	30%	10%	26%
US 1 North	0%	0%	0%	0%	0%	0%	12.5%
Edmonston Road North	7.5%	7.5%	12.5%	0%	7.5%	12.5%	2%
Kenilworth Avenue South	7.5%	7.5%	12.5%	0%	0%	0%	9.5%
Greenbelt Road West	7.5%	12.5%	12.5%	0%	12.5%	12.5%	11%
Greenbelt Road East	7.5%	12.5%	12.5%	0%	20%	25%	8%
Breezewood/Springhill Drive	5%	0%	30%	0%	0%	30%	0%
Total	100%	100%	100%	100%	100%	100%	100%

### GREENBELT TRAFFIC ENVIRONMENTAL CONSEQUENCES SUMMARY



**No-build Condition:** Indirect, long-term, major adverse impacts to corridor-level traffic, and indirect, long-term, adverse impacts to intersections in the study area.

#### *Background Growth Rate*

Once all the vehicle trips were properly shifted, the planned development growth applied, and the WMATA-based growth applied, the vehicle background growth trips were applied. This consisted of applying a 0.33 annual growth factor to all roadways (non-interstate and interstate) based on the volumes after shifting existing vehicle trips due to the opening of the new North and South Core roadway network and new interstate ramps. The new North and South Core roadways themselves were not grown to avoid double-counting because they already contained the growth from the planned developments and Greenbelt Metro Station-based growth. In addition, the cut-through volumes were added to these roadways based on the new connections to/from the interstate becoming available. Appendix C contains a map showing the background growth pattern for both peak hours.

#### *Development of No-build Condition*

The planned developments, Greenbelt Metro Station growth, background growth, cut-through trips, and planned roadway improvements were summed together to create complete No-build Condition vehicle volumes covering all study area intersections. Figure 5-41 shows the No-build Condition turning movement volumes. Section 3.9.3.4 contains a description of the PHF and how it was used to provide a conservative traffic operations analysis.

Figure 5-41: Greenbelt No-build Condition AM and PM Weekday Peak Turning Movement Volumes



Figure 5-40: Greenbelt No-build Condition AM and PM Weekday Peak Turning Movement Volumes (continued)

