

Attachment 20A

Explanatory Note for General Services Administration (GSA) Report November 2, 2009

As required by Section 1609 of the American Recovery and Reinvestment Act (ARRA), GSA's NEPA status report is enclosed. Each of GSA's eleven Regional NEPA experts submitted spreadsheets for the projects funded in their region. Their submissions are based upon their review of existing project scopes and descriptions. Regional submissions were reviewed and consolidated by GSA Central Office staff in the Environment Division.

GSA's total number of ARRA Funded Projects is different than the total number of NEPA Actions (268 and 266, respectively). One project is "NEPA Not Applicable" and one project's level of NEPA has yet to be determined. Additional information about the NEPA N/A and NEPA TBD will be provided below.

GSA's report includes 115 projects reported as "Pending" NEPA Actions. Seven of these pending actions are projects that were identified within the last quarter and therefore are new to GSA's report (Page 2, Rows 60 and 218-223). The additional 108 pending actions have carried over from GSA's previous report. Of the pending actions that have carried over, 97 are expected to be Categorical Exclusions (CEs), 9 are expected to be Environmental Assessments (EAs), and 2 are expected to be Environmental Impact Statements (EISs). Explanations regarding the pending status of these 108 projects are provided below:

- Fifty-one of GSA's projects are undergoing scope clarifications and design development, and in some cases feasibility studies are underway. NEPA reviews have not yet been initiated for these projects.
- Of the remaining 57 pending actions, NEPA reviews are underway and no undue delays are expected. In several regions, EAs are underway with expected completion dates in early spring. In some regions, the majority of projects involve historic buildings, so GSA continues to work on National Historic Preservation Act (NHPA) consultations with State Historic Preservation Officers (SHPOs). CE's are expected for most renovation projects once scope details are defined and commissioning reports are completed. Other ongoing activities include Coastal Zone Consistency Determinations, flood hazard determinations, clarification of potential hazardous materials issues (e.g., asbestos), and public comment periods. Two regions reported that 35 pending CE's (approximately 30% of GSA's pending actions) are expected to be completed within the next reporting period.

Revisions Since the Previous Report

The following revisions have been made since the previous report:

- Changes in Appropriation Totals:
 - The Total ARRA Appropriations for the High Performance Green Building Full and Partial Building Modernization and Limited Scope Programs (Page 1, Rows 3 and 4) have been revised to reflect updated appropriations as submitted by GSA's regions.
 - Appropriations for High Performance Building Green Building Small Projects (Page 1, Row 6) have been added to the spreadsheet. Three categorical exclusions for these projects have been previously reported on Page 2 of the spreadsheet (Page 2, Rows 212-213 of GSA's spreadsheet for the November, 2009 report).
- The Herbert C. Hoover Building project Washington D.C. has been split into two separate NEPA Actions (Page 2, Rows 56-57). One action is an EA for perimeter security and one is a categorical exclusion for façade cleaning and utility upgrades.
- The Mary Switzer Building project in Washington D.C. has been split into two separate NEPA Actions (Page 2, Rows 59-60).
- A new High Performance Green Building Limited Scope project has been added at the Jackman, Maine Land Port of Entry (Page 2, Row 79).
- The Denver Federal Center Multiple Building tune-up project in Lakewood, CO has been split into two High Performance Green Building Limited Scope projects (Page 2, Rows 174 - 175 and four High Performance Green Building Small Projects (Page 2, Rows 219-222). The NEPA Action on Row 174 has not yet been determined and therefore has been left blank.
- Two additional projects have been identified under the High Performance Green Building Small Projects Program in Aberdeen, South Dakota and Pembino, North Dakota. These projects have been added on Rows 218 and #223. New projects and activities will continue to be incorporated into this Program and will be included the ARRA NEPA Status Report as they are identified.
- GSA has revised the "NEPA Status" Column on Page 2 of the spreadsheet to reflect appropriate designations for projects in which NEPA reviews have not been initiated.

Obligations

GSA was successful in meeting their target of committing \$2 billion to Recovery Act projects by the end of 2009. As of December 31, 2009 GSA has obligated \$2,340,841,622 to ARRA-funded projects. This figure is less than GSA's reported obligations found on the recovery.gov website,

totaling \$2,369,525,623. The discrepancy is explained in the obligations outlined below, which support administrative functions and programs that were not included on GSA's ARRA NEPA Status Spreadsheet:

- \$699,116 for rental of space;
- \$1,850,722 for the Training and Apprenticeship Program;
- \$6,479,407 for administrative actions and administrative support to various projects nationwide; and
- \$19,654,756 for the Buildings Operations Program.

NEPA N/A

The Acquisition of Fuel Efficient Vehicles on Page 1, Row 5 of the spreadsheet has been designated as "NEPA Not Applicable." This program involves the acquisition, allocation, and deliverance of motor vehicles procured with the \$300 million appropriated to GSA by ARRA. The vehicles acquired under this program shall not be added to GSA's inventory, are intended to replace existing vehicles, and will only be allocated to and used by agencies requesting the fuel efficient vehicles. The act in itself of procuring a piece of personal property for another agency's use is an administrative action taken on behalf of that agency. They are responsible for their own NEPA review.

Administration and Oversight of ARRA-funded Activities

The following programs included in GSA's ARRA appropriation are not listed on the spreadsheet because they are administrative programs supporting the management, oversight, and administration of ARRA projects and activities:

- Rental of Space;
- Building Operations;
- Training and Apprenticeship Program;
- Recovery Accountability and Transparency Board; and
- Office of High Performing Green Buildings.

Examples of NEPA Benefits

The following two examples indicate specific benefits that have resulted from the completion of NEPA reviews for GSA ARRA-funded projects.

1. Environmental Assessment for FBI Field Office Consolidation, San Juan, Puerto Rico (GSA Spreadsheet, Page 2, Row 7)

NEPA Benefit: Through the EA process and associated consultation with the Puerto Rico SHPO, a new building was identified as eligible for listing on the National Register of Historic Places.

The FBI Field Office Consolidation project involves the construction of a new parking garage adjacent to the existing Hato Rey Federal Building and Courthouse. Through consultation between GSA's Historic Preservation Officers and SHPO, the Hato Rey Federal Building was identified as a structure eligible for listing on the National Register, although it has not yet reached the age of 50 years. The NEPA review for the proposed parking garage will involve continued consultation with SHPO to ensure the new structure does not negatively impact the area of potential effect, or viewshed, of the Hato Rey Federal Building.

2. Environmental Assessment for Edith Green/Wendell Wyatt Federal Building, Portland, Oregon (GSA Spreadsheet, Page 2, Row 53)

NEPA Benefit: As a result of the EA and feasibility study, the NEPA process has encouraged the investigation of various energy efficient technologies such as the installation of a ground source heat pump.

Renovations to the Edith Green/Wendell Wyatt Federal Building involve modernizations to convert the federal facility into an efficient high performance green building. Through the NEPA review and feasibility study, GSA has identified the potential for installation of a ground source heat pump for the building. The NEPA process has also ensured that the public is involved with the entire process, by holding scoping meetings to disseminate information regarding the test well for the ground source heat pump, and the determination of whether or not it can meet specifications to work in the building.

In addition to the examples provided above, GSA has found that in many regions the NEPA review process and the expedited manner in which ARRA-funded projects are reviewed has helped to strengthen GSA's relationships with State Historic Preservation Offices. GSA has been working closely with SHPOs in various regions to complete Section 106 Consultations under the NHPA for renovations to historic buildings. In addition, internal GSA relationships have been strengthened between regional NEPA Program Managers and regional Historic Preservation Officers.

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