Attachment 19A

Explanatory Note for General Services Administration (GSA) Report
May 2, 2011

As required by ARRA 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 and verified with the GSA Central Office Project Management Office.

GSA's total number of ARRA Funded Projects is 513, while the total number of NEPA Actions is 512. This is because one project, Acquisition of Fuel Efficient Vehicles, has been determined as "NEPA Not Applicable." The "NEPA Not Applicable" designation is discussed in further detail below.

Since the last report, GSA has completed 3 NEPA Actions for ARRA-Funded Projects. However, the total number of NEPA Actions completed has decreased to 255. This is due to the consolidation of High Performance Green Building (HPGB) Small Projects into one line item (Row 258). These 234 HPGB Small Projects are reported as Pending because not all NEPA reviews are complete due to incomplete project scopes, as discussed in further detail below. Therefore, 71 HPGB Small projects reported as "Done" on the last quarterly report are now reported as "Pending." This brings GSA's total completed NEPA Actions down to 255.

The current report includes 251 projects reported as "Pending" NEPA Actions. One hundred and seven of these pending actions are projects that were identified within the last quarter and therefore are new to GSA's report. The additional 144 pending actions have carried over from GSA's previous report. Of the pending actions that have carried over, 140 are expected to be Categorical Exclusions (CEs), 3 are expected to be Environmental Assessments (EAs), and 1 is expected to be an Environmental Impact Statement (EIS). Explanations regarding the pending status of these 144 projects are provided below:

- All 140 expected CE actions are undergoing scope clarifications and design development. NEPA reviews have not yet been initiated for these projects.

- The remaining 4 pending actions (3 EAs and 1 EIS expected) are currently undergoing NEPA reviews and no undue delays are expected. GSA continues to work on National Historic Preservation Act (NHPA) consultations with State Historic Preservation Officers (SHPOs), Coastal Zone Consistency Determinations, flood hazard determinations, transportation studies, and public comment periods.

Revisions Since the Previous Report

The following revisions have been made since the previous report:

- A new Border Stations and Land Port of Entry project in Pembina, ND has been added to the spreadsheet (Row 5).

- The Washington DC Herbert C. Hoover Building Perimeter Security project (Row 67) was reported as withdrawn as of the April 15, 2010 report. This project has been reinvigorated and the NEPA Status has been appropriately changed to pending.

- The HPGB Limited Scope Project at the Boston, MA O'Neill Federal Building has been added back to the spreadsheet (Row 82). This project was removed in the previous quarterly spreadsheet, but a separate CE was prepared for the project.

- The HPGB Limited Scope Project, Oklahoma City Post Office Courthouse Exempt, has been removed from the spreadsheet. This project was erroneously reported twice in the last quarterly spreadsheet. This has been corrected, as it is covered under the CE for the Oklahoma City Post Office Courthouse HPGB Limited Scope Project (Row 207).

- The HPGB Small Projects, with the exception of one project (U.S. Mission to the United States, Row 257), have been grouped together into one line item (Row 258). Since the previous report, 107 HPGB Small Projects have been added to the spreadsheet, for a total of 234 actions represented on Row 258. These projects are small in scope and size and include activities such as advanced metering; recommissioning; and retrofits or replacements to roofs, HVAC systems, or lighting systems. These projects fall under GSA's definition of automatically categorically excluded actions that by their very nature are not major Federal actions that significantly affect the quality of the human environment. The NEPA Status for these projects is listed as pending, as many projects are receiving reappropriated ARRA funds and are still undergoing scope clarification. Given that these projects are automatic CEs, the NEPA will be completed for all actions when scopes are finalized.

- The three HPGB Small Projects that have been withdrawn from the spreadsheet are represented in Row 258. An explanation of these projects is provided below.

Withdrawn Projects

The following six projects have been withdrawn from the spreadsheet:

- ME-New LPOE at Ferry Point (Row 9);

- ME-New LPOE at Milltown – Feasibility Study (Row 10);

- Franconia, VA Warehouse (Row 255);
- NH-Portsmouth National Passport Center at Pease AFB (Row 258);
- Lakewood, CO Denver Federal Center – Building 85A Motor Replacement (Row 258); and
- Brownsville, TX USBS Brownsville & Matamoros (Row 258).

Each of these projects was added to the Section 1609 Report based on the expectation that they would be receiving reappropriated ARRA funding. However, it has been determined that each of these projects will be funded through alternative sources and therefore have been removed from GSA's list of ARRA projects.

Obligations

As of March 31, 2011, GSA Public Buildings Service Federal Buildings Fund has obligated $5,514,717,435 to ARRA-Funded Projects. This figure is less than GSA's reported obligations found on the recovery.gov website, totaling $5,716,024,116. 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:

- $91,720,552 for rental of space;
- $1,850,722 for the Training and Apprenticeship Program;
- $34,968,902 for administrative actions and administrative support to various projects nationwide; and
- $72,766,505 for the Buildings Operations Program.

NEPA N/A

The Acquisition of Fuel Efficient Vehicles 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 another agency which is responsible for the NEPA review of its actions.

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 (Row 16)

   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. Categorical Exclusion for Edith Green/Wendell Wyatt Federal Building, Portland, Oregon (Row 64)

   NEPA Benefit: The NEPA review process and feasibility study have 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.

Furthermore, the nature of GSA's ARRA-Funded Projects has helped to improve communication and strengthen internal relationships within GSA. The majority of GSA's projects involve minor renovations and alterations, which have often been overlooked in the past since they tend to be ordinary CE projects. GSA's NEPA Specialists have expressed the need to build relationships in this area to ensure that they are notified of these types of minor projects and consulted in the event that scopes are changed or potential issues are identified. GSA has found that the ARRA-Funded Projects have helped to open the door in establishing communication lines and improving working relationships between all parties involved with renovation and alteration projects.

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