

March 8, 2023

The Honorable Robin Carnahan  
Administrator  
General Services Administration  
1800 F Street NW  
Washington, DC 20405

Dear Administrator Carnahan:

As the General Services Administration (GSA) conducts the consultations required in the Consolidated Appropriations Act for Fiscal Year 2023, Maryland and Prince George's County are committed on all levels of government to providing the best sites for the new, consolidated Federal Bureau of Investigation (FBI) headquarters. In 2013, the GSA and FBI selected Greenbelt and Landover from among thirty-five submissions to be two of the three finalists. In restarting the process, Congress directed GSA in the Consolidated Appropriations Act for Fiscal Year 2022 to select a new headquarters site from among the three finalist sites including Greenbelt and Landover.

The goal of the new FBI headquarters project has always been to consolidate all headquarters employees into a single facility both to improve the mission of the FBI and to save the taxpayer money on costly leased facilities. In addition, unlike the J. Edgar Hoover Building, the new headquarters is to meet ISC Level V security standards to provide the highest level of security to a federal facility. Congressional resolutions by the Senate Committee on Environment and Public Works, and the House Committee on Transportation and Infrastructure in 2011 and 2016 reaffirmed the above goals and required that the headquarters be within 2 miles of a Metrorail station and 2.5 miles of the Beltway. In addition, the House resolution directed the GSA to consider "the total costs to the government for relocations, site preparation, and site acquisition." By any objective evaluation, Greenbelt and Landover meet all these criteria and provide the best opportunity for transportation access, the quickest construction schedule, and the least costly sites for this project.

The purpose of the current consultations is to provide the GSA, as the sole agency authorized by Congress to finalize the FBI headquarters site selection, with an opportunity to evaluate the viability of the current site selection criteria. We are concerned that 11 years into this process the surprise emphasis on proximity to Quantico and other non-consolidating FBI National Capital Region facilities was added to the criteria only to put a finger on the scale toward one site and is not based on any real needed requirement of the FBI to carry out its vital national security mission. While we applaud President Biden for issuing two executive orders on advancing racial equity, we remain concerned that the Biden Administration's high prioritization of equity is not reflected in the current site selection criteria and process. Not only does the consideration of equity appear to be marginalized in terms of its weighting, the criterion on equity is treated differently, in such a way that the site selection panel can too easily

overlook what are important, factual contrasts in implications for equity between the Maryland sites and the Virginia site. Finally, we are concerned that the weighting of the Cost criteria is not sufficient and that the Cost criteria do not even come close to accounting for the full cost to the Federal government of the Springfield site, and, as a result, fail to comply with Congressional intent.

We believe that GSA should take this opportunity to re-evaluate the inclusion of proximity to Quantico and other non-consolidating facilities, apply equal weights to all criteria, and include the full costs of relocating all of the current tenants at the Springfield site and of retaining, rather than selling, the land.

Maryland and Prince George's County are ready to work on this project with GSA and the FBI. Prince George's County has many exciting economic development projects underway that demonstrate we are ready to meet this opportunity. Those projects include Urban Atlantic at New Carrollton, Largo Carrilon including the new UMMS Hospital, National Capital Business Park, University of Maryland College Park Discovery District, National Harbor and MGM.

We look forward to discussing our concerns with the current site selection plan and how Greenbelt and Landover can meet the needs of a new FBI headquarters.

### **Criteria #1: FBI Mission Requirement**

*1.a Proximity to the Site to the FBI Academy Quantico*

*1.b Proximity to the Site of Non-consolidating Operationally Significant FBI/NCR Real Estate*

Many of us have been working on this project since its beginning. We were all alarmed at the inclusion of proximity to Quantico and other non-consolidating FBI National Capital Region facilities in the FBI Mission criteria. Reviewing all the applicable documents from the history of the project, we could only find one passing reference to a GSA project survey that asked the new headquarters to be in "reasonable distance to the White House, the U.S. Capitol, and Quantico." Both Greenbelt and Landover are within a "reasonable distance of the White House, the U.S. Capitol, and Quantico." But now proximity to Quantico and these non-consolidating sites has become the highest weighted criteria in the process and is measured solely in mileage. We want to ensure a fair process on what is expected to be the largest public works project in a generation in the National Capital Region. We know that if our Virginia colleagues were concerned that a federal competition would disadvantage a majority Black community they represented, the Virginia Delegation would also raise this concern.

When Senator Cardin ushered the 2011 Senate Committee on Environment and Public Works (EPW) resolution through the Committee he relied on two documents to inform the requirements. One was the GSA project survey and the second was the FBI's 2011 "Federal Bureau of Investigation Headquarters Project Report." That FBI report did not ask that the site be close to Quantico or other non-consolidating facilities. The resolution itself did not add a requirement for proximity to Quantico.

The 2013 Request for Expressions of Interest that GSA issued as an initial site selection document did not include any mention of proximity to Quantico. The 2017 Prospectus submitted by the Obama-Biden Administration also did not mention a requirement that the final site be close to Quantico or other non-consolidating facilities. Neither the 2016 Senate EPW or the House Transportation and Infrastructure resolutions mentioned proximity to Quantico.

The first time non-consolidating facilities were raised was in a June 2022 memo from the FBI to GSA. The first time that proximity to Quantico was mentioned was in the release of the September 2022 Site Selection Plan. Director Chris Wray's February 2018 plan to keep the headquarters at the existing site did not mention proximity to Quantico or other non-consolidating facilities.

The Maryland Congressional Delegation has asked the FBI for the data on why proximity to Quantico needs to be included and weighted the most of any criteria. How many headquarters employees travel to Quantico on a daily basis? How long do FBI headquarters employees stay at Quantico? What is the purpose of the FBI employees' trips to Quantico or other non-consolidating facilities? In fact, we learned in a briefing that two of the 5 non-consolidating facilities are also located in Northern Virginia in Fairfax County. In response to our request, we were told that in July and August 2022 that only 500 employees from the headquarters consolidation visited Quantico with no additional information.

We are engaged in this process because we know the vital mission that the FBI plays in our national security. We want to work with GSA and the FBI to demonstrate how the FBI can better perform its mission.

Director Wray has identified cybersecurity as a top priority for the FBI's mission. He said "That's why cyber is one of the FBI's highest priorities. And it'll stay near the top of our list as long as nation-states and cybercriminal syndicates keep innovating." Maryland stands at the center of cybersecurity with the National Security Agency and Cyber Command at Fort George G. Meade. In addition, the Maryland sites provide access to the Federal Courthouse at Greenbelt, the Defense Information Systems Agency also at Ft. Meade, the U.S. Secret Service Training Center, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) National Laboratory, and the Federal Law Enforcement Training Center. Maryland sites also have close access to Joint Base Andrews, BWI Thurgood Marshall Airport, and Ronald Reagan National Airport.

The University of Maryland, College Park; Bowie State University; and University of Maryland, Baltimore are prepared to launch a Maryland Academy for Innovation in National Security for the FBI to nurture its future workforce, enrich its current workforce, and leverage subject matter expertise and cutting-edge research and development facilities across multiple campuses. This would create a pipeline of highly skilled and diverse employees to the FBI and support the FBI's mission by leveraging expertise in areas such as terrorism, cybersecurity, data analysis, artificial intelligence, criminology, and much more. As you may recall, the FBI went to Bowie State University, Maryland's first HBCU, to recruit a more diverse workforce just last year.

#### *1.c Proximity to the Site to Headquarters of the US Department of Justice (DOJ)*

Both Greenbelt and Landover sites are close to the Department of Justice (DOJ) headquarters. In addition, the Greenbelt site is located on the same Metro line as the DOJ headquarters so that FBI employees can take a short 25 minute ride between the Greenbelt and the DOJ headquarters. This will be a real asset to headquarters employees, particularly during rush hour.

## **Criteria #2: Transportation Access**

### *2.a Walking Distance from the Site to a Station on the Metrorail System Operated by the Washington Metropolitan Area Transit Authority (WMATA)*

	Greenbelt	Landover	Springfield
Walking Distance to Metro	464 feet or 140 steps about 1 minute 30 second walk	1.9 miles or 3,224 steps or 25 minute walk	.51 miles or 922 steps about 11 minute walk

#### Greenbelt Metro site:

The Greenbelt site is the closest to a Metro site and a MARC Commuter Rail station. Located in the City of Greenbelt, the site is owned by WMATA. The site currently is a WMATA commuter parking lot that Prince George's County will replace with a parking garage that will also include the bus bays and Kiss and Ride at no cost to the Federal government. Greenbelt is one of three planned communities that was created during the New Deal.

Transit-oriented development around the Greenbelt site is also a priority for WMATA that was expressed in their Joint Development Strategic Plan. The Greenbelt site also represents a "reverse commuting site" meaning that trains that are normally empty will travel to the site in the morning and reverse in the afternoon rush hours.

#### Landover site:

The Blue Line Corridor (BLC) – the roughly five mile stretch of Prince George's County that runs from Capitol Heights Metro at the DC/Prince George's border, out to Downtown Largo Metro, and including Central Ave (MD 214) – is the County's next big opportunity to focus on all of their economic development goals and to create a model for place-based economic development that can be replicated in other places.

The County began a study of the public land assets, looking for prime opportunities to restore vacant and underutilized parcels to the tax rolls, while also meeting key economic development goals. During the course of that study, Prince George's County confirmed a significant number of opportunities along the Blue Line Corridor, the coordination of which could represent a chance for the type of dense, walkable urban core with a mix of uses that would set a prototype and send signals to the market for the kind of transformation we are looking for across the entire County.

Over the course of two Maryland General Assembly sessions, the County and the Maryland General Assembly has secured \$400M in bonding authority and over \$66M in grants and other funding sources to make catalytic investments in near-term, high-visibility multimodal infrastructure and placemaking projects, including:

- 7.5-10K Capacity Amphitheater
- Downtown Library & Cultural Center
- Market Hall
- Civic Plaza (at the County's Administration Building)
- Youth Sports Fieldhouse (International Competition-Grade)
- "Complete Streets" infrastructure investments on several major thoroughfares (Arena Drive, Morgan Boulevard and Central Avenue) and Pedestrian Safety Improvements (at Metro nodes)

- New public streets near Downtown Largo and Morgan Boulevard Metro stations (to improve connectivity and walkability in these areas)
- Micromobility Services at Downtown Largo and Morgan Boulevard Metro Stations
- Central Avenue Connector Trail (Phase 1)

Maryland Purple Line:

The Purple Line project will provide reliable and convenient connectivity to Greenbelt when the system is projected to open in 2026, with a station just one stop away at the University of Maryland, College Park.

The 16-mile light rail alignment includes 21 stations, four of which will provide connection to Metro stations that “connect the spokes” at Bethesda, Silver Spring, College Park and New Carrollton. The University of Maryland Station is also a short ride by bus or shuttle to Greenbelt and is served by Metrobus, The Bus, Shuttle-UM, Maryland Department of Transportation (MDOT) Maryland Transit Agency (MTA) Commuter Bus, and the FDA Shuttle.

*2.b Walking Distance from the Site to Virginia Railway Express (VRE) or the Maryland Area Regional Commuter (MARC)*

MARC provides passenger train service over 203 miles on three different routes including the Brunswick, Camden, and Penn lines. These lines deliver direct access to Washington, D.C., Baltimore, MD, Frederick, MD, Martinsburg, WV, and Baltimore/Washington International Thurgood Marshall Airport (BWI) while providing numerous connections to other transit services. MARC carries 36,700 passengers daily (recovered to 10,000 post-pandemic) and provides transit linkages throughout the Washington and Baltimore metropolitan areas. MDOT is investing in future MARC expansion, with several plans and projects underway including the recently announced investment of \$450 million in the Frederick Douglass Tunnel program. Engineering for a new Bayview Station, Elkton Station, Germantown station enhancements, expansion to add a fourth track near BWI, and enhanced service modeling are underway this year.

The planned MARC run-through service to Virginia will extend MARC’s service area, providing a seamless connection beyond Washington Union Station to L’Enfant Plaza, which houses 18 federal agencies, and to Alexandria, Virginia. MARC service plans include doubling service on the Penn Line and adding midday, peak and weekend service on the Camden and Brunswick Lines. MTA constructed a new terminal station at Camden in downtown Baltimore and a new BWI station in 2019. MDOT also continues to support a robust transit-oriented development program to expand and enhance housing, jobs and destinations accessible by transit.

*2.c Accessibility to Major Bus Line Stops(s)*

Greenbelt is currently served by both WMATA and Prince George’s County’s TheBus local bus routes, providing connections to key local destinations including New Carrollton, College Park, and the Greenbelt Federal Courthouse. TheBus fixed route system consists of 28 routes that cover more than 10,000 miles throughout the County, and Prince George’s County is planning a five route BRT network to expand transit capacity and quality in the area. WMATA’s planned Priority Corridor Network includes enhanced bus service to Greenbelt.

The State's MTA provides 27 commuter bus routes connecting the Baltimore and Washington metropolitan areas through contracted service agreements. These services provide convenient commute options and the contracts provide the flexibility for Maryland to adjust service quickly to meet emergent travel demands. Furthermore, as part of the multistate compact for WMATA transit service, additional WMATA bus service can be added to support growing centers in Maryland through increasing Maryland's annual contributions.

#### *2.d Site's Proximity to the Nearest Commercial Airport*

Greenbelt and Landover provide similar access to Reagan International Airport, as the proposed Springfield site does, and additional access to Baltimore/Washington International Thurgood Marshall Airport (BWI Marshall). Located approximately 20 miles from Greenbelt/Landover and 32 miles from Washington D.C., BWI Marshall provides easy, multi-modal access and cost-effective air travel to over 80 direct domestic and international destinations. With a current average of more than 250 daily departures, flight options and destinations continue to increase. BWI Marshall offers non-stop service to major U.S. cities, including most destinations with FBI field offices, with the lowest average fares in the National Capital Region. Travelers have easy access to both Baltimore and Washington, D.C. with Amtrak and MARC commuter trains, and Baltimore's Light Rail directly serves the BWI Marshall terminal with routes into the city and beyond. Offering a range of parking and hotel options, the airport and the BWI Business District are truly an 'easy come – easy go' gateway to the world and the Washington-Baltimore Region. Because of its amenities and outstanding customer service, BWI Marshall was recognized as the 2020 Best North American Airport of its Size based on passenger satisfaction surveys.

### **Criteria #3: Site Development Flexibility**

#### *3.a Site Area and Site Geometry*

#### *3.b Earliest Time the Government could Commence Construction Activities*

The Greenbelt and Landover sites are the largest two sites under consideration and have the quickest schedule to start construction on the new, consolidated FBI headquarters.

The Greenbelt site is 61 acres and adjacent to state-owned land that will not be developed. This state-owned land will provide a natural security barrier to ensure that the new headquarters ISC Level V security standards. In addition, WMATA has 14 acres at the site that could accommodate future growth through public private partnerships. The Greenbelt site currently is a WMATA commuter parking lot that will be replaced at no cost to the Federal government by Prince George's County. WMATA is committed to beginning construction at this site as early as possible, committing to GSA that construction would commence in 6-9 months.

The Landover site is the largest site at 80 acres that could easily accommodate future growth at the FBI headquarters. At Landover, the federal government could commence construction immediately.

The Springfield site has both GSA warehouses and a classified tenant currently on the site. The classified tenant move is not yet fully funded, and no work has commenced on moving the significant

GSA warehouse space. Estimates are that it would take at least 3-5 years to relocate the tenants on the Springfield site leading to a significant delay in the construction of the new headquarters.

#### **Criteria #4: Promoting Sustainable Siting and Advancing Equity**

*Advancing racial equity and support for the underserved communities through the Federal Government*

President Biden has recognized the need to prioritize racial equity considerations in federal decisions and issued his first executive order to “advance racial equity and support for underserved communities through the Federal government.” The executive order makes clear that equity needs to be a “whole of government effort” and that federal resources should be invested in communities such as Prince George’s County that have historically been underserved. This past February, the President issued a second executive order entitled “Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.” We commend President Biden for making equity a priority of his Administration and expect that GSA match the President’s whole of government effort by increasing the weighting of the equity category and making it competitive from site to site like the other criteria.

While Prince George’s County currently has 48% of the federal warehouse space and 20% of the federal workforce in the National Capital Region, the County has only 4% of the federal office leased space. Fairfax County has almost triple the federal office leased space and about half the federal warehouse space as Prince George’s County. According to Prince George’s County officials, 72% of all county residents must leave the county for work each day. Prince George’s County has only 61% of the federal jobs that Fairfax County has. These numbers highlight a historical imbalance in the federal presence in the National Capital Region that has translated into more wealth and opportunity in Fairfax County than Prince George’s County. In a study of the 150 largest counties in the country measuring growth potential for income and wealth, Fairfax County was listed as 2<sup>nd</sup> while Prince George’s County was 107<sup>th</sup>. Most significantly, the median household income for Fairfax County is \$40,000 more than the median household income in Prince George’s County.

Regrettably, the imbalance in warehouse and leased office locations within the region follows a pattern of racial disparity. Prince George’s is now the only majority Black jurisdiction in the National Capital Region and the above statistics highlight the need for a more robust consideration of equity in the site selection process. The GSA has an opportunity to consider this racial and economic imbalance as it selects the site for the new FBI headquarters. The site selection plan put forth by the GSA on September 22 not only precludes a full consideration of equity, it risks perpetuating and exacerbating existing disparity by favoring site characteristics that are themselves the result of historical inequity. The process rewards locations that benefit from the imbalance resulting from federal site decisions over time as described above. Rather than addressing this disparity, the GSA’s proposed site selection process penalizes Prince George’s County for its previous decades of disadvantaged status.

Under GSA’s criteria, while other categories such as FBI Mission are graded as a competition “between” the three sites, the consideration of equity calls for the possibility of all three sites to be scored equally and with the highest rating. Without GSA scoring the sites to demonstrate which site promotes equity the most, the system can be subjectively used to eliminate any kind of advantage for equity. Furthermore, equity and sustainability considerations are bundled together under the same criterion and weighted 15/100, significantly lower than the new “FBI Mission Requirements.”

We can see that communities like Rosslyn and Crystal City in Arlington have benefited from federal office leased space as federal workers, residents, and government contractors want to be located close to those facilities. Over time, GSA decisions about the locations of offices and warehouses have repeatedly translated into more wealth and opportunity in Fairfax County than Prince George's County.

Director Wray said that "The diversity and inclusion of [the FBI] workforce is something I care deeply about...because the success of our efforts impacts our operations, our culture, and our future." Placing the new headquarters in Prince George's County will give the FBI greater access to diversify its workforce. The Greenbelt and Landover sites are the only ones close to an HBCU, Bowie State University. We know that recruiting from Bowie State has been a priority for the FBI and having the new headquarters near the university would provide a pipeline of diverse employees.

The FBI has often had a tortured past with the Black community especially under former Director J. Edgar Hoover. Placing the headquarters in the only majority Black jurisdiction in the National Capital Region provides the FBI with the opportunity to reset that relationship and chart a new future.

*Promoting sustainable locations for Federal Facilities and strengthening the vitality and livability of the communities in which Federal facilities are located*

Greenbelt is the only site that allows for transit-oriented development. In fact, development of the Greenbelt Metro site is a priority for WMATA in their Joint Development Strategic Plan. Because the Greenbelt site is proximate to a Metro and MARC station, no shuttle buses would be required at the site, dramatically reducing the emissions and eliminating an ongoing operational expense.

President Biden made a commitment that 40 percent of the overall benefits of certain Federal investments flow to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. This Justice40 initiative is an important commitment on environmental justice by President Biden. The communities surrounding the Greenbelt and Landover sites meet the definition of underserved communities more than those communities around Springfield achieving another of President Biden's priorities. Placing the new FBI headquarters at those locations would help further help advance President Biden's Justice40 initiative.

Both Greenbelt and Landover are priority areas for development by the City of Greenbelt, Prince George's County and the State of Maryland.

**Criteria #5: Cost:**

- 5.a Cost to Acquire the Site*
- 5.b Cost to Prepare the Site*

The cost of acquiring and preparing the Greenbelt and Landover sites are far less than the Springfield site. We believe that GSA needs to account for the full cost of relocating all the tenants at Springfield including the cost of the classified tenant, as well as the opportunity cost of retaining, rather than selling, the Springfield land. We also believe that GSA has weighted the cost criteria much too low for this project. While the construction of the new headquarters is estimated to cost between \$3 and 4 billion, we

must be good stewards of the taxpayers' dollars as we move forward. We ask that GSA include the full cost of relocating all the Springfield tenants and increase the weighting of the cost criteria.

In addition, the commitments made to GSA by the State of Maryland – both Governor Moore and the Maryland General Assembly – and Prince George's County would ensure no cost to the Federal government to prepare the sites.

MDOT SHA has a project team assembled ready to deliver transportation infrastructure improvements to the roadway network at both the Greenbelt and Landover sites. The improvements at the Greenbelt site include additional ramp connections to I-495 Capital Beltway and improvements to the roadway network within the site in conjunction with the redevelopment of the WMATA Metro Station. There has been close coordination with Prince's George's County and WMATA on these efforts. For the Landover location, design is already underway for the Medical Center Drive interchange improvements which is a key component for the roadway network at this site.

President Biden's career has been grounded in a strong commitment to partnerships with organized labor. The President recently traveled to Maryland to announce a project labor agreement for the construction of the Frederick Douglass Tunnel. In addition, Maryland put in place a project labor agreement for the construction of the Maryland Purple Line last summer. We believe that this once in a generation project should be coupled with a strong commitment to the workforce that will help deliver the project and the subsequent, supporting infrastructure upgrades around the site. Not only should the construction of the headquarters honor President Biden and our commitment to labor, but so should the projects around the sites that need to be completed. We believe that Maryland is the best place to complete the project in honoring strong commitments to the workforce.

Although the Springfield site is owned by GSA, it is the most encumbered site. As noted, on the site are GSA warehouses and a classified tenant that would need to be relocated. This would add both cost and schedule delay into building the new FBI headquarters. Estimates are that the GSA warehouse would cost \$120 million to relocate and that the classified tenant would be in the hundreds of millions of dollars. Moreover, GSA should not consider the Springfield land as zero value. In the initial consideration of the FBI headquarters project, the sale of the Hoover Building was considered a benefit to the government ranging up \$750 million. The 58 acres at the Springfield location also have a value.

Finally, relocating these existing tenants would also result in at least an estimated 3–5-year delay in constructing the new project. This delay would inevitably add to the overall cost of the project, as GSA itself has conceded. In its presentation to the Senate Environment and Public Works Committee in 2018, GSA and FBI noted that the cost of delay in moving the FBI from the Hoover building is \$84 million a year in construction price increases, \$142 million annually for FBI leases, \$42 million annually in building maintenance, and potentially \$160 million in emergency repairs. As GSA noted simply in its presentation, "Delay=Increased Cost."

The Greenbelt and Landover sites are the best deal for the taxpayer and will cost the Federal government hundreds of millions of dollars less than Springfield.

### **Conclusion:**

We know that the Maryland sites were the most competitive as all three development teams in the 2016 process for selecting and constructing a new headquarters submitted bids on our sites, while the site in Springfield, Virginia only had one bid submitted.

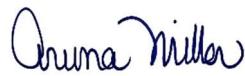
We stand ready to work with GSA and the FBI to ensure that a fair process is used to select the site of the new FBI headquarters.

Sincerely,



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Wes Moore  
Governor of Maryland



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Aruna Miller  
Lieutenant Governor



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Angela Alsobrooks  
Prince George's County  
Executive



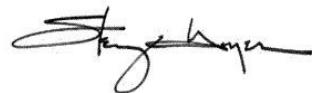
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Benjamin L. Cardin  
US Senator



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Chris Van Hollen  
US Senator



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Steny H. Hoyer  
Member of Congress



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Glenn Ivey  
Member of Congress



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Dutch Ruppersberger  
Member of Congress



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John Sarbanes  
Member of Congress



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Kweisi Mfume  
Member of Congress



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Jamie Raskin  
Member of Congress



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David Trone  
Member of Congress

CC: Jeff Zients, White House Chief of Staff  
Shalanda Young, Director, Office of Management and Budget  
Chris Wray, Director of the FBI