

Final

Record of Decision Next NGA West Campus in the Greater St. Louis Metropolitan Area

Prepared for
National Geospatial-Intelligence Agency



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1.0 Record of Decision for the NGA Action

SUMMARY: The National Geospatial-Intelligence Agency (NGA) is issuing this Record of Decision (ROD) on the proposed siting, construction, and operation of the Next NGA West (N2W) Campus (Proposed Action). This ROD is informed by the Final Environmental Impact Statement (FEIS), dated April 1, 2016, public comments, and consideration of additional factors, including mission, site evaluation criteria, threat and risk assessment, costs, security, and programmatic requirements.

NGA has decided to implement the preferred alternative identified in Section 2.8 of the FEIS. Implementation of this alternative would result in the construction and operation of the N2W Campus at the St. Louis City Site in St. Louis, Missouri.

FOR FURTHER INFORMATION: The FEIS and appendices (approximately 1,500 pages), Executive Summary, and this ROD are available on the Internet at <http://www.NextNGAWest.com>. For more information or general questions about the EIS, contact Amy Snively at 601 E. 12th Street Kansas City, Missouri, 64016, or nextNGAwest@usace.army.mil.

Copies of the FEIS are also available for review at the following libraries:

- St. Louis County Library, Meramec Valley Branch: 625 New Smizer Mill Rd., Fenton, Missouri 63026
- O'Fallon Public Library: 120 Civic Plaza, O'Fallon, Illinois 62269
- St. Louis County Library, Grant's View Branch: 9700 Musick Road, St. Louis, Missouri 63123
- St. Louis Public Library, Divoll Branch: 4234 N Grand Blvd, St. Louis, Missouri 63107

2.0 Decision Process

2.1 Summary of Decision

The National Geospatial-Intelligence Agency (NGA) has prepared this Record of Decision (ROD) pursuant to the regulations established in the Council on Environmental Quality's (CEQ's) implementing regulations (Title 40 *Code of Federal Regulations* [CFR] Parts 1500–1508). NGA has decided to site, construct, and operate a replacement campus called Next NGA West (N2W) Campus for the NGA West facilities currently located at South 2nd Street, St. Louis, Missouri. The Agency requires a site that puts the Agency in the best position to fulfill its statutory mission for the future. NGA analyzed its proposed action in a Draft Environmental Impact Statement (DEIS) and a Final Environmental Impact Statement (FEIS) prepared by the U.S. Army Corps of Engineers (USACE) Kansas City District in accordance with the National Environmental Policy Act (NEPA), as amended (42 United States Code 4371, et seq.). The FEIS includes the Agency Preferred Alternative (APA) for the site of the N2W Campus in the greater St. Louis metropolitan area. Members of the public were invited to comment on the DEIS for a 45-day comment period starting October 9, 2015, and they were invited to comment on the APA provided in the FEIS from April 1, 2016, through May 2, 2016.

NGA is the proponent of this action and the U.S. Air Force (USAF) is a cooperating agency under NEPA because the USAF may be the ultimate property owner of the N2W Campus.

Following agency review of mission needs, security, cost, environmental analysis, schedule implications, laws, policy, regulations, and executive orders (E.O.'s), the Agency decided the St. Louis City Site is the right choice for the future of the NGA and those that depend upon the Agency's services.

2.2 Background

NGA and its predecessor agencies have existed within the City of St. Louis at 3200 South 2nd Street, St. Louis, Missouri, since 1952. NGA's mission is to provide timely, relevant, and accurate geospatial intelligence in support of national security. The Agency delivers geospatial intelligence, providing a decisive advantage to warfighters, policymakers, intelligence professionals, and first responders. Many missions, such as geospatial intelligence analysis, global positioning system support, aeronautical safety of navigation, and precision targeting support, are accomplished at the South 2nd Street facility.

The new campus will include 800,000 square feet of office space, a visitor control center, central utility plant, structured parking, a secure perimeter, and a remote inspection facility. The N2W Campus will accommodate approximately 3,150 government and contractor personnel.

2.3 Purpose and Need

The site selected for the N2W Campus must satisfy requirements in the Purpose and Need for action by the Agency as declared in the DEIS on October 9, 2015, and the FEIS on April 1, 2016.

Purpose – The purpose of the N2W Campus is to enable future missions, improve resiliency, and resolve the risks associated with the South 2nd Street facility. Challenges associated with the South 2nd Street facility include the proximity to floodplains and incompatible industrial activities, as well as the age and physical setting of existing buildings, which limit their ability to be economically renovated to meet current facility standards. In addition, the South 2nd Street facility cannot meet post-9/11 requirements for protection of the workforce and mission.

Need – NGA requires a new campus capable of supporting current and future mission requirements at a location that complies with established standards for such facilities. Construction and operation of the campus must meet the following site location and campus requirements:

1. Allows for continuity and resilience for existing and future NGA operations.
2. Provides purpose-built facilities that are safe, secure, flexible, and efficient.
3. Is conducive to recruiting and retaining top-quality personnel.
4. Stays within anticipated funding limits for construction, operation, and maintenance.
5. Supports future changes to mission requirements.
6. Provides necessary utilities, telecommunication, and transportation infrastructure.
7. Contains a boundary that is a usable shape for necessary buildings and infrastructure and outside the 500-year floodplain.
8. Provides physical security and force protection with appropriate setbacks from adjacent roads, railroads, and property boundaries.
9. Provides potential to use topography and landscape to enhance security.
10. Is available for acquisition in 2017 and construction in early 2018. (Construction was formerly scheduled for fiscal year 2017, but it was delayed based on program funding and schedule impacts.)
11. Meets or exceeds current building standards and codes, particularly those related to the design, detailing, and construction of structural and non-structural components, to resist the effects of seismic and other natural or human-made events

2.4 Site Selection Process

NGA conducted a rigorous site selection process to identify and evaluate potential candidate sites for new campus construction. The site selection process was launched in 2012 and reached out to local communities, regional development agencies, realtors, and other stakeholders to identify potential sites. A total of 186 sites were suggested, after which NGA developed and implemented a filtering process. The initial filters included the following: 1) sites had to be within a 25-mile area surrounding the South 2nd Street facility and at least 50 acres in size, 2) sites had to be within 2 miles of a state or interstate roadway or four-lane divided roadway, and 3) Illinois sites had to be along either Interstate 255/Interstate 270 or Illinois Route 4/Interstate 64.

After applying the initial filters, 22 sites remained. These 22 potentially viable sites were evaluated using additional selection criteria as outlined in Section 2.3 of the FEIS. These criteria were as follows:

1. Overall Quality of Site Factors

- Site configuration, size, and geometry allowing for flexible design and expansion with appropriate security cushion
- Site topography
- Site safeguards (natural existing or manufactured opportunities)
- General site impressions

2. Development Suitability and Risk Factors

- Development cost
- Expansion capability and flexibility
- Ease of procurement (number of owners, public or privately owned, etc.)
- Geotechnical or environmental risks

3. Site Infrastructure Factors

- Power: Adequate reliable power at site with diverse service
- Traffic and Transportation: Adequate quality roadways, mass transit, low traffic volume, and multiple points of access
- Utilities: Proximate water, natural gas, sanitary, and sewer services

- Telecommunications: Adequate quality, diverse telecommunications infrastructure proximate to site

4. Site Location Factors

- Neighborhood Quality: Commercial planned development, non-industrial neighbors
- Staff commuting impact
- Zoning: Current and planned development aligns with mission facility
- Proximity to amenities such as childcare facilities, service stations, eateries, and hospital

Using these criteria, the sites were further screened to six that warranted more comprehensive review. Prior to initiating the detailed EIS, two of the remaining six sites were dropped from consideration because one was sold and the other did not meet the necessary site configuration requirements. Those two sites were referred to as Weldon Spring and NorthPark. The following four remaining sites were carried forward for environmental review:

- **Fenton Site (environmentally preferred)** – 1050 Dodge Drive, Fenton, Missouri. This site is located in south St. Louis County, Missouri, on a 167-acre tract adjacent to Interstate 44/U.S. Route 50 and was the former location of a Chrysler automobile assembly plant demolished in 2009. The site is located within a larger 294-acre parcel proposed for redevelopment as industrial/commercial use along the Meramec River. The construction footprint encompasses the entire site, which is flat and covered almost entirely in concrete and asphalt.
- **Mehlville Site** – 13045 Tesson Ferry Road, St. Louis, Missouri. This project area encompasses a 101-acre area in south St. Louis County, Missouri. The property is slightly graded with an existing 645,520-square-foot two-story office complex with interconnected buildings constructed for Metropolitan Life Insurance Company and completed in 1976. The office building consists of eight modules with connecting hallways. Because of NGA's unique requirements, the existing office complex cannot be renovated.
- **St. Louis City Site** – 2301 Cass Avenue, Missouri. The St. Louis City Site is a 99-acre site located within the city limits of the City of St. Louis. This area is predominantly vacant land with some residential, light industrial, and commercial use. It is situated just north of the City of St. Louis's downtown, at the intersection of Jefferson and Cass Avenues. The City of St. Louis recommended this site for review because it is part of an ongoing redevelopment effort. Disinvestment has occurred over decades at the site, leading to an 85 percent vacancy rate as of December 2015. The Pruitt-Igoe property is not part of this acquisition.

- **St. Clair County Site** – Wherry Road and Rieder Road. The St. Clair County Site comprises 182 acres and is situated between Scott Air Force Base (AFB) and MidAmerica St. Louis Airport near Shiloh, Illinois. The site is one mile south of the Interstate 64/Exit 19 interchange. The St. Clair County Site is relatively level and approximately 80 percent of the location has been used as agricultural land for the past century. Scott AFB and its Cardinal Creek Golf Course bound the site to the south. The golf course driving range, owned by St. Clair County and leased by Scott AFB, is included within the site boundary and would be removed as part of the Proposed Action.

As documented in the EIS, environmental analysis was performed on these alternatives, as well as the alternative of No Action, following a Notice of Intent that was published on November 10, 2014. Under the No Action Alternative, NGA would not build a new campus. The No Action Alternative does not meet the Purpose and Need of the Proposed Action.

Concurrent with the development of the environmental analysis in the EIS, the Agency also formed internal teams to consider other relevant factors, including cost and schedule evaluations, more detailed site planning studies, and security and mission assessments.

2.4.1 Process for Final Site Selection

In January 2016, a Site Selection Team (SST) was assembled to gather the findings presented in the individual analyses and assessments described previously and present them to the Director of NGA to inform his determination of the APA. Following the public comment period of the DEIS, the SST considered the comments and developed a tiered approach to narrow the site evaluation. This process resulted in three rounds of review and screening, as follows:

- **Round One:** Re-analyze Purpose and Need against each alternative.
- **Round Two:** Reduce sites from four to two based upon differentiating criteria.
- **Round Three:** Refocus the remaining differentiating criteria against the remaining two sites.

Round One – Re-analyze Purpose and Need against each Alternative

The SST re-confirmed that all sites met the Purpose and Need and determined that refining criteria were necessary to distinguish how each site could most effectively deliver the needs of the Agency. The refining criteria evaluated in this round were: 1) Mission Efficiency and Flexibility, 2) Security, 3) Environmental Considerations, 4) E.O.'s, Regulations, and Policies related to Land Acquisition, 5) Cost, and 6) Schedule.

Round Two – Reduce Sites from Four to Two based upon Differentiating Criteria

The SST next evaluated methods to narrow the field of alternatives. During Round Two, it was determined that cost and schedule were the criteria that demonstrated the greatest differentiation among the sites. Therefore, the four sites were reduced to two based upon these two criteria.

Cost

Cost estimates to acquire land, complete initial site development, and provide transportation improvements were factored into the costs to develop. The “Initial Cost” metric used in this evaluation is defined as the sum of the offer price, the estimated site development cost, transportation improvements, and the initial Information Technology (IT) trunk line cost. The offer price was the largest variance in price between the four sites, followed by site development, IT trunk line, and transportation improvements. At the low end, the St. Clair County site was formally offered for \$0 and the St. Louis City site was offered at \$14 million. At the high end, the offer prices for the Fenton and Mehlville sites were over \$30 million. The real estate offer prices in combination with the other site development costs provided a clear distinction, with the Fenton and Mehlville sites having the highest likely costs.

Schedule

The schedule risk assessment took into consideration the complexity of the activities necessary for the current owner to prepare the site for acquisition by the end of fiscal year 2017. The significant variance between the asking price and the appraised value for the Mehlville and Fenton sites introduced additional schedule risk in price negotiations that did not exist with the St. Louis City and St. Clair County sites.

The Fenton and the Mehlville Sites also were found to have higher schedule risk with site acquisition not occurring until fiscal year 2018. The Mehlville Site presented a measure of complexity that involved the need to vacate the current tenants and then demolish the existing facility prior to the start of any site work. With regard to the Fenton Site, it was anticipated that extensive work would need to be accomplished to bring the site to environmentally clean standards and make it eligible for purchase. In May 2015, USACE sent two separate formal letters to the landowners of the Fenton Site and the St. Louis City Site, requesting that any remaining investigations of hazardous materials be performed at their expense, and if necessary, a plan for remediation with the appropriate regulating entity be developed. No further progress toward site characterization or remediation had been undertaken by the owners of the Fenton Site.

Because the SST did not see any progress toward site remediation, additional schedule risk was assessed for the Fenton Site. The property owners of the St. Louis City Site responded by preparing partial Phase I and Phase II Environmental Site Assessments and securing funding through the Missouri Department of Natural Resources (MDNR) Brownfields/Voluntary Cleanup Program.

With regard to cost and schedule risks, the St. Louis City and St. Clair County sites presented the best value and the best opportunity to acquire the real estate in fiscal year 2017. Based upon these factors, the Mehlville and Fenton sites were recommended to be eliminated from consideration as the preferred alternative.

Round Three – Refocus the Remaining Differentiating Criteria against Remaining Two Sites

In Round Three, the SST's analysis focused exclusively on the St. Louis City and St. Clair County sites to provide information to NGA on criteria that refined the comparison between the two sites. During this comparison, NGA reviewed its comprehensive analyses of all security requirements for the new campus.

Counsel from both NGA and USACE compiled and evaluated E.O.'s, Regulations, and Policies that had bearing on the site selection and land acquisition. Upon further evaluation, the SST determined six of these were relevant for Round Three analysis. While it was determined that these E.O.'s, Regulations, and Policies do not dictate or exclude one site over another, they were either required or applicable considerations of the Refining Criteria that further demonstrated differences between the alternatives.

The SST considered the following Refining Criteria in the comprehensive analysis of the two sites in Round Three:

Mission Efficiency and Mission Flexibility

- Team GEOINT – Defined as the ability to attract and maintain industry partnerships. Assesses the positive or negative impact of the proposed site on partnerships with NGA customers, academia, and industry.
- Team NGA – Defined as the ability to attract and maintain quality staff. Assesses the positive or negative impacts of the proposed site on recruiting and retention of employees.
- Proximity to NGA Arnold Facility – Assesses the impact of the distance between the proposed site and the NGA Arnold facility.

Security

- Undetected Surveillance and Direct Fire Weapons – Assesses the level to which the site allows for unimpeded monitoring of the surrounding area to discover and address threats from surveillance and/or direct fire weapons.
- Violent Crime – Assesses violent crime statistics composed of four offenses: murder and non-negligent manslaughter, rape, robbery, and aggravated assault.
- Compatible Surroundings – Assesses surrounding area compatibility with N2W Campus.

Environmental Impact

- Assesses the effect of the Agency's planned action on the human and natural environment.

E.O.'s, Regulations, and Policies

- Department of Defense Instruction (DoDI) 4165.71, *Real Property Acquisition* – Sets out the applicable laws and E.O.'s that guide the selection of the location. Requires land to be acquired at the least cost, with preference being given to donated land.
- E.O. 12072, *Federal Space Management* – Requires federal agencies locating in urban areas to give first consideration to central business districts, and requires agencies to consider whether the selection conforms with the programs and activities of other federal agencies and the development goals of the local government.
- E.O. 12898, *Environmental Justice (EJ)* – Directs consideration be given to the effects of planned Federal projects on minority populations and low income populations.
- E.O. 13693, *Planning for Federal Sustainability in the Next Decade* – Along with Unified Facilities Criteria (UFC), requires agencies to take into account sustainability goals in determining location, including location-efficient sites, maximizing the use of existing resources, protecting the natural environment, and advancing local and regional planning goals.
- E.O. 13062, *Strong Cities, Strong Communities Initiative (SC2)* – Creates partnerships and encourages coordination between federal programs and local redevelopment goals. Provides local government access to tools and resources to facilitate redevelopment of targeted locations.
- *Promise Zones* – Presidential initiative that provides local governments with access to tools and resources to facilitate the redevelopment of targeted locations.

Schedule

- Assesses the likely availability of the site in terms of planned schedule to begin construction.

Cost

- Assesses the cost of real estate and site development which includes foundation costs, transportation improvements and IT trunk line costs.

Comparison of Final Two Sites

NGA leadership identified the Agency's priorities and placed Mission Efficiency and Mission Flexibility and Security as highest. Below is a narrative summary of the final conclusions on how the two sites were evaluated against the Refining Criteria, along with a notation of each criteria's prioritization.

Mission Efficiency and Mission Flexibility (High) – Mission efficiency attributes exist at both sites, and NGA can meet its mission at either location. However, when focusing on flexibility and vision of the future for NGA, the St. Louis City Site holds an advantage. Locating the campus at the St. Louis City Site will help NGA enhance existing partnerships and develop new relationships. NGA relies on an increasingly cutting-edge set of skills in areas such as data science, imagery science, and geodetic and geophysical sciences, and NGA uses all tools available to attract talented people with these skill sets. One way is by locating in a central setting to draw upon synergies with the City of St. Louis's expanding technology and innovation base, such as the 200-acre district referred to as the Cortex Innovation Community. Proximity to this district, as well as to existing industry and academic partners located in St. Louis, maximizes access to a strong and growing culture of technological innovation. The St. Louis City Site will better enable NGA to attract the new, high tech professionals needed to succeed in the future. The existing long-term relationships with, and proximity to, Washington University, Saint Louis University, and Southern Illinois University at Edwardsville is attractive to new talent. The relationships provide a strong recruitment pool for NGA, and the proximity of the St. Louis City Site to the universities is helpful in making the most of student and faculty relationships with the Agency.

By locating the NGA campus centrally within the St. Louis metropolitan area, opportunities for recruitment of employees from all demographics are maximized. The central location also maximizes opportunity for employee recruitment by providing many living options for new hires and their families within communities across the entire metropolitan area.

The relationship to the existing NGA Arnold facility is of importance to NGA. The distance between the new campus and NGA facility located in Arnold, Missouri has an impact on the effectiveness of operations. Due to needs for collaboration and shared resources between the two locations, the St. Louis City Site was identified to have an advantage over the St. Clair County Site. The St. Louis City Site would only increase the distance by four miles over the current distance between Arnold and Second Street of 21 miles, in comparison to a distance of approximately 42 miles from the St. Clair County Site.

Based on these findings, the St. Louis City Site was determined to best meet the Mission Efficiency and Mission Flexibility criteria.

Security (High) – Security requirements for the N2W Campus were developed per UFC 4-020-01, *DoD Security Engineering Facilities Planning Manual*, dated September 11, 2008. The standards require minimum standoff distances for buildings and functional areas, unobstructed space around buildings, design of delivery areas, configuration of access roads, and parking restrictions. The standards for minimum standoff distances also take into account building populations for inhabited or uninhabited buildings and primary gathering buildings.

All sites meet these requirements. The Agency also completed a classified design analysis that included more stringent standards, and all sites met those requirements as well. The new campus must provide protection levels appropriate for the workforce and the facilities. The UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*, establishes standards for the construction and location of DoD buildings. Those protection levels were built into early planning for each alternative. Both the St. Clair County and St. Louis City sites met the requirements, and neither site requires a security waiver.

In Round Three, the SST evaluated threats of undetected surveillance and direct fire weapons, violent crime, and compatible surroundings. These criteria present challenges for the St. Louis City Site. To mitigate these challenges, vehicle access control will be much like the environment at NGA Campus East, where large vehicles are forced to the Remote Inspection Facility. There will be a 500-foot setback between the entry control points, the Remote Inspection Facility, and inhabited buildings. In addition, security will be enhanced through building design, security engineering, traffic queuing, onsite covered parking, close cooperation with local police officials, the presence of NGA security police, and coordination with the City on nearby development. Both sites meet the established standards for construction of a DoD installation. However, it is recognized that the St. Clair County Site offers a comparative advantage to the security posture with its adjacency to a military base and open landscape.

Environmental (Medium) – From an environmental standpoint, there are differences between the St. Louis City Site and the St. Clair County Site. These sites vary in degrees of existing conditions, present-day development, environmental contamination, and onsite natural and cultural resources. Both locations would adversely impact cultural resources under Section 106 of the National Historic Preservation Act, and as part of that concern, NGA and USACE have been actively engaged in consulting with organizations to develop a Programmatic Agreement to provide appropriate mitigation. The Programmatic Agreement covers Sections 106 and 110 of the National Historic Preservation Act, and is incorporated as Appendix A to this Record of Decision.

The existing conditions of the St. Louis City Site consist of a hardscape, urban environment with minimal natural resources present. As such, generations of development and settlement have occurred at this location, leaving behind environmental contamination and cultural and historical resources. Cleanup of

existing environmental contaminants, as reported in the environmental site assessments located in the Appendices of the FEIS, will result in long-term benefits to environmental conditions at the St. Louis City Site and will be remediated prior to federal ownership. The St. Louis City Site will also benefit from the transformation of many vacant properties, including the long-term benefit of revitalization of a blighted community, improvements to health and safety, and reduction in crime through the provision of a stabilizing institutional investment in the area. The St. Louis City Site will also require the relocation of current residents and business owners. The relocations by the City of St. Louis represent an adverse short-term impact as the residents would experience disruption of their normal routines and duress from changing their residencies.

In contrast, the St. Clair County Site presents a mix of agricultural, undeveloped land, and stream and wetland habitat. While impacts to wetlands were avoided through master planning, the St. Clair County Site could not altogether avoid impacts to waters of the United States or biological resources.

Development of the St. Clair County Site would result in impacts to undeveloped land, forested and riparian habitat, and associated wildlife habitat. During the EIS review process, the U.S. Fish and Wildlife Service had concerns about the St. Clair County's timber harvest and removal of Threatened and Endangered Species foraging habitat while the environmental analysis was being conducted. This location would require extensive Threatened and Endangered habitat mitigation if chosen by the Agency.

Environmental impacts are not insurmountable at the St. Clair County Site. But when compared to the long-term benefits to the human environment, the St. Louis City Site presents greater long-term advantages. The timeline to complete mitigations for both sites were assessed in the review of the schedules for property acquisition. Of the two sites, the St. Louis City Site was assessed to be environmentally preferred.

E.O.'s, Regulations, and Policies (Medium) – In addition to the numerous environmental laws and policies controlling this relocation action, the DoDI 4165.71, dated January 6, 2005, requires NGA to take into consideration certain laws and E.O.'s when selecting a location for a new facility. First among these, as statutory law, is the Rural Development Act of 1972, 7 U.S.C. Sec. 2204b-1. The Rural Development Act directs federal agencies to develop policies and procedures that give first priority to locating new facilities in rural areas. USACE regulation, ER 405-3-10, dated October 31, 2013, requires that agencies give first priority to the location of new facilities to rural areas, as defined by the Department of Agriculture. If the customer's mission does not require a specific location or geographical area, the USACE must give first priority to locating new facilities in a rural area. If the mission or program requires being in an urban area, the USACE must consider the Central Business District under E.O. 12072, *Federal Space Management*.

As defined in the Rural Development Act, 7 U.S.C. Sec. 1991(a)(13)(A), a rural area means any area other than – (a) a city or town that has a population of greater than 50,000 inhabitants; and (b) the urbanized area contiguous and adjacent to such a city or town. An “urbanized area” is further defined as “a statistical geographical area defined by the U.S. Census Bureau, consisting of a central place(s) and adjacent densely settled territory that together contain at least 50,000 people, generally with an overall population density of at least 1,000 people per square mile.” (41 CFR 102–83.60)

Using U.S. Census Bureau data, NGA determined that the entirety of St. Clair County is included in the St. Louis-MO-IL Metropolitan Statistical Area. Thus, St. Clair County constitutes an urbanized area and does not fall within the definition of a rural area.

The Department of Agriculture Economic Research Service uses several different classification methods to delineate “rural areas,” including the 2013 Rural-Urban Continuum Codes, Urban Influence Codes, County Typology Codes, Office of Management and Budget’s Metropolitan Statistical Areas, and the U.S. Census Bureau’s Urban-Rural Classification scheme. None of these classification schemes denotes St. Clair County as a rural area. Therefore, the Rural Development Act does not apply, and was not considered in this final list of criteria.

During the original Site Location Study conducted in 2012, NGA decided the new facility must be within 25 miles of its current location. Both sites meet this requirement. However, because the entire area of consideration for a new campus falls within the U.S. Census Bureau’s St. Louis-MO-IL Metropolitan Statistical Area and constitutes an urbanized area, NGA considered the policies set out in E.O. 12072 as per the DoDI 4165.71, *Real Property Acquisition*. The St. Louis City Site is more aligned with the objectives set forth in this E.O. to give first consideration to locating a new federal facility in a central business area and/or adjacent to an area of similar character, to make the city a more attractive place to work, to conserve existing resources, and to encourage redevelopment.

Additionally, NGA considered that both the St. Clair County and the St. Louis City sites were offered free of cost, also in accordance with DoDI 4165.71, *Real Property Acquisition*, Paragraph 6.5.3. Both project areas required consideration due to the preference for donated lands.

The SST further reflected on the provisions of E.O. 13693, *Planning for Federal Sustainability in the Next Decade*, recently released in 2015, Section 4(g), and its *Implementing Instructions*, which require federal agencies to incorporate sustainability goals in their relocation planning. The guidance requires that consideration be given to location efficiency, prioritizing the development of brownfields, grayfields, and infill, and avoiding the development of agricultural and undeveloped land.

E.O. 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* directs federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority populations and/or low-income populations. The St. Louis City Site includes a majority of minority and/or low income residences. The potential relocations represent a short-term adverse impact occurring in a predominantly minority and low-income neighborhood. However, these relocations would occur in an area that is blighted and lacking many key elements of a sustainable community with vital services. It is anticipated that the development of the campus at this location would provide a long-term beneficial effect to individuals that are relocated to an area with improved standard of living and community services.

E.O. 12072 requires NGA to take into account the compatibility of the site with local, State and regional redevelopment goals, and conformity with federal activities and programs. The SC2 and Promise Zones initiatives represent federal policies designed to elevate economic development in designated communities. Building on the local community's redevelopment goals, they create federal partnerships which assist the community in strengthening its capacity to create jobs and a more competitive business climate. The city of St. Louis has been designated as both a Promise Zone and SC2 partner.

Overall, the St. Louis City Site offers an advantage in meeting the consideration requirements for current federal priorities.

Schedule (Low) – Risks involved with schedule and acquisition were assessed and considered in the decision for all four sites. Both the St. Louis City and St. Clair County sites support planned land acquisition in fiscal year 2017. The schedule risks for the St. Louis City Site associated with hazardous waste remediation, relocation of existing property owners, and cultural resources mitigation at both sites were considered in the final decision. The St. Louis City site's risk was assessed through partial Phase I and Phase II Environmental Site Assessments, provided by the City, as well as documented in the FEIS. The Phase II Environmental Site Assessment has been conducted on property available to the City for testing, and will be concluded on the remaining parcels by the City after land acquisition from the current property owners. The site's acceptance into the MDNR Brownfields/Voluntary Cleanup Program in October 2015 provides an early funding stream for environmental remediation and alleviates schedule risk.

The City of St. Louis has prepared a detailed schedule to complete all site preparation tasks prior to federal ownership, including its land acquisition from the current property owners, to create a single and complete parcel for sale. As of May 2016, agreements of sale have been reached with 94 of the 101 property owners. The City is continuing negotiations with the seven remaining property owners, and it is

expected that these negotiations will be concluded shortly. NGA has reviewed this schedule and determined it to be reasonable to achieve land acquisition in fiscal year 2017.

Cost (Low) – Cost was a decisive factor in eliminating both the Mehlville and Fenton sites in Round Two. In Round Three, both the St. Clair County Site and the St. Louis City Site were formally offered at no cost to NGA. Therefore, site development costs were more closely considered in Round Three. The USACE requires a single and complete parcel from the City of St. Louis. All site relocation costs, demolition, utility removal, archeological survey work, and environmental remediation will be performed prior to federal ownership and at the expense of the City of St. Louis. Therefore, these site development costs were not factored into the federal government costs. Similarly, St. Clair County was asked to perform site cultural resources mitigation and habitat mitigation at the County's expense. While the level of site preparation varies between the two sites, there is no federal investment.

Site development costs evaluated for the two sites included estimates to prepare the foundation to withstand seismic events, make necessary transportation improvements, and construct an IT trunk line servicing the new campus. Based on these site development factors, the cost estimate to develop the St. Clair County Site is approximately 20 percent more than the St. Louis City Site, mainly due to the foundation costs for the building. A more robust and expensive structural mat foundation to account for seismic loading would be required at the St. Clair County Site.

In Round Three, site development costs were considered a lower priority following the removal of the Mehlville and Fenton sites. Between the remaining two sites, the St. Louis City Site is estimated to be less expensive for NGA to develop, which offers an advantage to the St. Louis City Site.

2.4.2 Final Decision

Based upon the Agency's adherence to the NEPA process and the evaluation of all of the information available to the NGA Director, Robert Cardillo, NGA has chosen the St. Louis City Site for the N2W Campus. The decision is based on the following assessment:

A focus on **Mission Efficiency** revealed no clear differences between the sites. **Mission Flexibility** uncovered an advantage for the St. Louis City Site, given its proximity to current and future partners as well as an area that is accessible to a diverse pool of employees with a wide range of commuting and living opportunities. Additionally, the shorter distance between the St. Louis City Site and NGA facility located in Arnold, Missouri was considered advantageous to the effectiveness of ongoing and future operations.

With respect to **Security**, the St. Clair County Site holds an advantage. Its adjacency to Scott AFB, clear lines of observation, and history of low crime are benefits to NGA's mission. However, both final

locations met the security standards for construction and location of DoD buildings established in the UFC 4-010-01, *DoD Minimum Antiterrorism Standards for Buildings*.

The **Environmental** criterion was documented in the EIS. The EIS identified an impact difference between the long-term effects of the two sites. Development of the St. Clair County Site would result in impacts to undeveloped land, water resources, forested and riparian habitat, and associated wildlife habitat. While the St. Clair County Site did not have insurmountable environment impacts, the long-term environmental benefits through remediation of environmental contamination, visual transformation, and revitalization of a recognized blighted community resulted in an advantage for the St. Louis City Site.

A review of all applicable **E.O.'s, Regulations, and Policies** pointed to an advantage for the St. Louis City Site. While there was no law, policy, or regulation that dictated choosing one site over the other, the preponderance of applicable guidance favors the St. Louis City Site.

An analysis of the proposed **Schedule** and associated risks resulted in an advantage for the St. Clair County Site. The extent and future risk of environmental remediation, cultural resource mitigation, and the City of St. Louis's land acquisition from the current property owners represent a risk to the schedule for the St. Louis City Site that does not exist with the St. Clair County Site, although NGA assesses that either site can be acquired in fiscal year 2017 and meet construction schedule requirements for fiscal year 2018.

Based on **Cost** estimates, it would cost approximately 20 percent less for the Agency to develop the St. Louis City Site than the St. Clair County Site, including cost to acquire the property, perform site development and foundation work, make transportation improvements, and install an IT trunk line at the St. Louis City Site than it would for the St. Clair County Site. This results in an advantage for the St. Louis City Site.

The St. Clair County Site's security and schedule advantages do not outweigh the mission flexibility, environmental, cost, and policy advantages to the Agency by siting in the City of St. Louis. The opportunity to cultivate and foster relationships with academia, industry, and governmental partners and technological incubators that are emerging near the St. Louis City Site will better enable NGA's mission success in the future.

3.0 Environmentally Preferred Alternative

The findings of the EIS identified both adverse and beneficial impacts to the human environment. The SST evaluated the environmental effects for each site using the information described in the DEIS and input obtained as a result of the public comment period. Short-term and long-term, direct and indirect, and cumulative effects were assessed. The environmentally preferred alternative was based on an analysis of the lasting, long-term impacts to the environment. Relative differences between impacts of each alternative formed the basis for the selection of the environmentally preferred alternative.

The Fenton Site resulted in the fewest long-term, adverse impacts along with the greatest benefits when compared to the other alternatives. It provides opportunities associated with the redevelopment of a concrete-covered landscape. Specifically, redevelopment of this property would result in minor to moderate benefits through the remediation of environmental contamination from past operations of the former Chrysler automobile assembly plant. This would also represent a major visual benefit, as the site would be transformed into a new campus comprising buildings and green space. Locating the N2W Campus at either the Fenton Site or St. Louis City Site would avoid impacts to aquatic and biologic resources. What distinguishes the Fenton Site from the other sites is that it resulted in no/negligible impacts to the long-term service levels on area roadways. Additionally, the Fenton Site did not require the major impacts to historic buildings or cultural resources found with the St. Louis City Site.

Of the four alternatives considered, the Mehlville and St. Clair County sites were determined to have the greatest adverse impacts with the fewest environmental advantages. Both of these sites were of concern to the U.S. Fish and Wildlife Service because of long-term impacts to habitat corridors supporting federally listed Threatened and Endangered Species. If the construction and operation of the N2W Campus were to occur at either of these locations, the purchase and/or compensation of offsite habitat would be required as mitigation. Construction and operation of an NGA campus at the Mehlville and St. Clair County sites would impact regulated waters of the United States. In addition, a long-term major impact to a known cultural resources site would occur at the St. Clair County Site. While the adverse environmental impacts at either location could be mitigated, the impacts are nonetheless more significant than the impacts associated with other alternatives.

Overall, the Fenton Site would result in relatively fewer negative, long-term environmental impacts while providing the greatest benefits. It would avoid impacts to water, biological, and cultural resources and would have long-term benefits associated with transforming the site into a campus with green space. The cleanup of existing hazardous contamination associated with the former Chrysler automobile assembly plant was identified as beneficial. For these reasons, the Fenton Site was identified as the environmentally preferred alternative by USACE.

4.0 Public Involvement and Agency Coordination

NGA posted a Notice of Intent in the *Federal Register* on November 10, 2014, a Notice of Availability for the DEIS on October 9, 2015, and another Notice of Availability for the FEIS on April 1, 2016.

Copies of these documents are presented in Appendix 1A of the FEIS. Involvement activities completed include scoping; formal public meetings during scoping and the DEIS public comment period; informal stakeholder contacts, including phone calls, meetings, and e-mails; direct announcements mailed to residences and businesses within 0.33 mile of the proposed sites; ad hoc agency meetings; elected and public official briefings; media briefings; a project website (www.NextNGAWest.com); distribution and review of the DEIS; and press releases. The public was also invited to comment on the APA for 30 days after publication of the FEIS on April 1, 2016.

A detailed summary of the scoping meetings can be found in Appendix 1B of the FEIS, and a full list of comments received during scoping along with government responses is provided in Appendix 1C of the FEIS. A detailed summary of the comments received during the DEIS public comment period can be found in Appendix 1D of the FEIS.

The U.S. Environmental Protection Agency reviewed the DEIS and sent a letter, dated November 23, 2015, requesting additional information for each of the four action alternatives in the DEIS. The U.S. Environmental Protection Agency followed up with a letter dated April 29, 2016, expressing that its comments had been addressed.

Minority and low-income households could be affected by the Proposed Action. In accordance with E.O. 12898, efforts were made to engage these groups through phone calls to community leaders, direct mailings to homes, and follow-up meetings to identify project-related impacts that could disproportionately affect these populations. As part of community engagement, the City of St. Louis is planning to form a Neighborhood Consultant Committee (NCC) to develop commemorative projects to help define and commemorate the neighborhood. The City shall invite neighborhood leaders and residents to public meetings to discuss components of the project, define features of particular meaning within the project footprint, and support the development of the area surrounding the project footprint. The members of the NCC shall be selected by the City of St. Louis in consultation with Tillie's Corner, an area activist group with representation within the project footprint, and shall include Tillie's Corner and other representatives of the neighborhood.

USACE engaged parties interested in potentially affected historic properties in accordance with Section 106 of the National Historic Preservation Act. NGA and USACE have actively engaged with consulting organizations, such as a local community group called Tillie's Corner and area tribes, during the National

Historic Preservation Act Section 106 Consultation process. Engagement through the development of a Programmatic Agreement with these consulting parties, the Missouri State Historic Preservation Office (SHPO), Illinois SHPO, interested tribes, and the Advisory Council on Historic Preservation have helped reduce concerns earlier expressed by the community and tribes. The Programmatic Agreement was signed by all parties on May 27, 2016, and is included in Appendix A.

Within one year of executing this ROD, NGA and USAF will develop an interagency support agreement, an addendum to the existing support agreement, or another appropriate agreement to identify any proposed allocation of responsibility for managing or funding necessary real property facility activities or expenses. In the absence of any such agreement addressing overarching responsibilities, NGA will retain responsibility for potential activities and expenses following property purchase, including environmental contamination, cleanup, and other environmental obligations and costs. Any such agreement must be signed by the properly authorized USAF official prior to that Service assuming any responsibility for real property facility activities or expenses at the selected site, other than real property accountability for maintaining real property records and reporting.

A complete list of the agencies and tribes contacted can be found in Section 7.0 of the FEIS.

5.0 Avoidance, Minimization, Mitigation and Environmental Protection Measures

All practicable means to avoid or minimize environmental harm from the alternative selected have been adopted. The St. Louis City Site consists of existing community with minimal terrestrial and no aquatic habitat. The site did not contain any identified waters of the United States. Through the selection of the St. Louis City Site, impacts to regulated aquatic resources and forest corridors have been avoided.

While aquatic and biological resources have been avoided, impacts to cultural resources will be required to prepare for site construction. Within the footprint of the St. Louis City Site, there are known historic properties listed on the National Register of Historic Places. The construction of the project would require the demolition of the Buster Brown-Blue Ribbon Shoe Factory and buildings within the footprint of the St. Louis Place Historic District. This adverse effect has been resolved through the stipulations and a proposed mitigation plan outlined in the Section 106 Programmatic Agreement, dated May 27, 2016.

The St. Louis City Site is the only project area with substantial minority and low-income populations that may be affected by the construction and operation of the N2W Campus. However, the analysis of the community impacts in Section 3.2 of the FEIS, *Land Use and Community Cohesion*, found that the sparsely occupied development, surrounded by vast areas of vacant parcels and businesses, does not support a sustainable community, and the development of the N2W Campus would result overall in a minor to moderate long-term benefit to community. In the short term, the residents would experience disruption of their normal routines and duress from changing their residencies. The City of St. Louis's proposed relocation process is to voluntarily relocate home and business owners consistent with the Missouri relocation statutes. By law, the City of St. Louis would fully mitigate the cost and efforts associated with the relocation and provide comparable property situated either nearby or in areas where more sustainable community services are available.

Mitigation for both cultural resources and the short-term relocation disturbance to the community will be handled by the City of St. Louis. Initiatives through the City have already been underway with neighborhood residents to develop meaningful mitigation projects, affording the residents the opportunity to help select ways to commemorate the historic resources and the community. NGA will continue to coordinate with the community and NCC on the design of the security feature around the N2W Campus. The feature will be in the form of either a fence or wall and is to be compatible with the community and the surrounding historic district. Design considerations shall include, but not be limited to, construction materials, color, and architectural details.

In addition to the mitigation elements described in the FEIS, site construction and development will require adherence to many environmental protection measures. The following summary table describes the necessary environmental protection measures outlined in the FEIS and the responsible entities.

Table 1. Environmental Protection Measures by Resource Area

Resource	Environmental Protection Measures	Responsible Entity
Socioeconomics	Not applicable	
Land Use and Community Cohesion	<p>Prepare and approve a site development plan.</p> <p>Ensure all acquisitions will be in compliance with Missouri statutes governing acquisition and relocations.</p> <p>Conduct construction primarily during weekdays and working hours.</p> <p>Make efforts not to obstruct the streets surrounding the site to the extent practical during construction.</p> <p>Crosswalks may be installed at intersections with sidewalks and stoplights.</p>	<p>NGA</p> <p>City of St. Louis</p> <p>NGA</p> <p>NGA</p> <p>NGA and the City of St. Louis</p>
Health & Safety	<p>Develop and implement a construction Health and Safety Plan.</p> <p>Comply with applicable Occupational Safety and Health Administration and DoD- and NGA-specific safety protocols.</p> <p>Install fencing and signage around construction site for the protection of children.</p> <p>Coordinate site plans with local emergency responders.</p>	<p>NGA</p> <p>NGA</p> <p>NGA</p> <p>NGA</p>
Traffic & Transportation	<p>Coordinate with the City of St. Louis to install traffic signals.</p> <p>Implement a Construction Management Plan.</p>	<p>NGA and City of St. Louis</p> <p>NGA</p>
Noise	Comply with the St. Louis Noise Ordinance for construction and operation activities.	NGA

Resource	Environmental Protection Measures	Responsible Entity
Hazardous Materials & Solid Waste	<p>Complete site characterization and removal or remediation of contamination. The site will be remediated through the MDNR Brownfields/Voluntary Cleanup Program. Obtain a letter of “No Further Action” from the state agency prior to property purchase.</p> <p>Execute a long-term overarching agreement with the USAF within one year to handle any contamination.</p> <p>Complete vapor intrusion assessment prior to construction and implementation of mitigation measures.</p> <p>Use, store, dispose of, and transport hazardous materials during construction in compliance with all applicable laws and regulations.</p> <p>Create a spill response plan for accidental spills/releases during construction activities and operation.</p> <p>Create a construction management plan, including hazardous materials protocols.</p> <p>Implement a secondary containment measure for diesel storage.</p> <p>Use, when possible, demolition materials, such as soil from grading.</p> <p>Reuse and recycle a large portion of the debris.</p> <p>Implement solid waste management and waste reduction, including recycling programs.</p>	<p>City of St. Louis</p> <p>NGA and City of St. Louis</p> <p>NGA for all remaining actions under Hazardous Materials and Solid Wastes</p>
Utilities	<p>Avoid outages to the greatest extent possible.</p> <p>Incorporate DoD energy policies and Leadership in Energy and Environmental Design or Green Globes green building goals.</p>	<p>NGA</p> <p>NGA</p>

Resource	Environmental Protection Measures	Responsible Entity
Cultural Resources	Uphold stipulations specified in the Programmatic Agreement with the Missouri SHPO.	NGA and City of St. Louis
	Comply with Unintended Discovery Plan if prehistoric- or historic-period archaeological sites are encountered after purchase of the property.	NGA
Visual Resources	Design landscaping and architecture commensurate with viewer sensitivity and campus security.	NGA
Water Resources	Implement appropriate best management practices (BMPs), such as silt fencing, during construction to avoid and minimize potential indirect impacts (erosion, sedimentation, and pollution) to offsite wetlands and surface waters.	NGA
	Obtain a Missouri State Operating Permit from MDNR.	NGA
Geological Resources	Implement appropriate BMPs such as silt fencing during construction to minimize potential soil erosion and sedimentation.	NGA
	Follow all federal procedures pertaining to the management of discovered resources in accordance with the Paleontological Resources Preservation Act of 2009.	NGA
Air Quality & Climate Change	Implement a Dust Control Plan to control onsite and offsite fugitive dust emissions, as prescribed in the Missouri Code of State Regulations.	NGA
	Implement a BMP to reduce onsite and offsite heavy-duty diesel vehicle emissions by limiting the time that vehicles can idle to no more than five minutes in any 60-minute period.	NGA
	Implement a BMP to reduce sulfur dioxide emissions into the atmosphere from industrial boilers, and thereby, also reducing emissions of fine particulate matter (PM _{2.5}).	NGA

Resource	Environmental Protection Measures	Responsible Entity
	Implement the U.S. Environmental Protection Agency's diesel emission reduction checklist.	NGA
Airspace	Coordinate with the Federal Aviation Administration during the design phase to avoid or minimize glint and glare through the selection of building materials and by modifying orientation and angles that could cause glint or glare.	NGA

6.0 Response to Comments

On April 1, 2016, the USACE Kansas City District and the NGA publicly released the FEIS discussing the APA for the site of the N2W Campus in the greater St. Louis metropolitan area. Members of the public were invited to comment on the APA during a 15-day comment period, which was extended to a 30-day comment period. The official FEIS comment period was from April 1, 2016, through May 2, 2016. This period was the third opportunity for the public to comment after the scoping period in November 2014 and December 2014 and after the DEIS was made public in October 2015.

All public comments were reviewed and evaluated by NGA and USACE. The comment period for the FEIS resulted in 1,556 inputs. While many comments articulated site preference and personal opinion, the following responses address those comments that were deemed most substantive. Substantive was defined by the NGA/USACE team as where the comment identified information not contained in the FEIS, or where additional explanation was considered helpful.

6.1 Comments that Pertain to the Site Selection Process

Comment: Costs were not properly accounted for in the decision or were not properly disclosed.

Response: *Initial cost estimates include the offer price, the site development cost, transportation improvements, and the initial IT trunk line cost as part of the site cost analysis and assessment. NGA evaluated the total site development costs of each alternative and carefully weighed the cost differences. A major distinguishing difference between the costs for the development of the remaining four sites was the cost of preparing the foundation due to the depth to bedrock.*

As it came down to the final two sites, a major distinguishing cost factor was the depth to bedrock. A facility built at the St. Louis City Site would tie into bedrock. A facility built at the St. Clair County Site would not tie into bedrock, and it would require a more robust and expensive mat foundation to account for seismic loading.

Comment: Several comments were received questioning the Agency's consideration of E.O. 12072 while not considering the Rural Development Act of 1972

Response: *The definition of "rural" was reviewed by NGA Counsel under the Rural Development Act of 1972, and NGA determined that the entirety of St. Clair County is included in the St. Louis-MO-IL Metropolitan Statistical Area. St. Clair County constituted an urbanized area and did not fall within the definition of a rural area. Thus, the Rural Development Act does not apply.*

NGA considered the policies set out in E.O. 12072. The St. Louis City Site was determined to be more aligned with the objectives set forth in E.O. 12072 given its adjacency to nearby business area and

opportunity to make the city a more attractive place to work, conserve existing resources, and encourage redevelopment.

Comment: There were several comments that identified the results of a survey of prospective NGA West employees on preferred site locations were cited as evidence that NGA's ability to recruit members of the millennial generation would be significantly greater at the St. Louis City site.

Response: *NGA recognizes that the survey of the next class of student hires is not a statistically relevant data point, and the Agency was open about the small numbers. The questionnaire was simply used as a means to either corroborate or discount whether other data NGA had researched on the workplace desires of the millennial generation holds true in terms of the types of young people who are drawn to a career in the intelligence community. While the future student employees did have a slight preference for the St. Louis City Site, this information was not significant in the overall evaluation of the Mission Efficiency and Flexibility criteria.*

Comment: There were several statements that the decision does not align with a Department of Defense 2005 Base Realignment and Closure (BRAC) document to relocate NGA onto Scott Air Force Base.

Response: *The 2005 BRAC Commission recommendations for reshaping the Defense Department's infrastructure and force structure became official on November 9, 2005. At the time, NGA was considered for co-location on Scott Air Force Base as it was the only option meeting the intent of that BRAC. The 2005 BRAC guidance does not apply to this decision.*

Comment: Concerns were expressed that the preparation of the St. Louis City Site would require more time to complete than the St. Clair County Site.

Response: *NGA assessed and considered the risks involved with schedule and acquisition for all four sites. Based on that information, the risks to schedule and the acquisition of the St. Louis City Site were documented, including risks associated with hazardous waste remediation cost and time to complete. The St. Louis Development Corporation has prepared a detailed schedule to complete all site preparatory tasks prior to land acquisition, and NGA has determined the schedule to be realistic, reasonable, and able to meet timeline requirements.*

Comments: Several commenters asked whether NGA considered the exposure of the workforce to area crime.

Response: *Crime was a consideration of NGA in its final determination. The rate of violent crime near the St. Louis City Site is higher than that for the St. Clair County Site. NGA already works closely in coordination with the St. Louis City Police today to secure surroundings for our workforce at the Second*

Street facility. The City of St. Louis has committed to continuing that cooperation and improving security measures around the St. Louis City Site, to include enhanced lighting, streetscape improvements, and security cameras. NGA is confident that this continued partnership will provide strong security for our workforce both while at the site and when transiting to and from work.

Comments: There were several comments concerning the security considerations of the APA and the level of detail provided in the FEIS.

Response: *As part of the analysis that led to identifying the Agency Preferred Alternative (APA) in the FEIS, the Agency reviewed and studied all aspects of security. The security assessment was done in strict accordance with and adherence to the UFC 4-010-01, DoD Minimum Antiterrorism Standards for Buildings, October 1, 2013, and UFC 4-020-01, DoD Security Engineering Facilities Planning Manual, September 11, 2008. No waiver is required for the St. Louis City Site to meet UFC security requirements. All sites in the FEIS meet UFC security requirements to protect the workforce and the campus facilities and defend against numerous threats, including explosives, direct fire weapons, and covert surveillance. Moreover, the level of protection specifically established for the N2W Campus is commensurate with those in the UFC for the type of facility that will be designed and constructed.*

6.2 Comments that Pertain to the Environmental Analysis

Comment: Two documents citing St. Clair counties in Michigan and Missouri were mistakenly used in the EIS. These documents were cited in the “Utilities” and “Geological, Soil, and Paleontological Resources” sections of the FEIS, respectively.

Response: *USACE acknowledges that the FEIS contains two incorrect references regarding the St. Clair County Site. These incorrect references were not the basis for the analysis performed in the EIS. The impact findings for these resource areas in the FEIS are correct. Impacts to utilities are still determined to be minor to moderate for the St. Clair County Site and impacts to paleontological resources are still determined to be no/negligible for the St. Clair County Site. Consequently, the substance of the misidentified information had no bearing on the environmental analysis or the NGA’s decision. These errors will be corrected in an errata sheet.*

Comment: Comments that potential hazardous contamination was not properly accounted for in the FEIS and the impact designation underestimates the concern.

Response: *The FEIS incorporates the best available information for all four of the evaluated sites, and at the time of publication, had sufficient information to assess risk. The St. Louis City Site’s risk was assessed through a partial Phase I and Phase II Environmental Site Assessments provided by the City. The results from these assessments are included in Appendices 3.6B and 3.6C of the FEIS and existing*

site contamination is presented in Section 3.6.3.1. The St. Louis City Site was accepted into the MDNR Brownfields/Voluntary Cleanup Program in October 2015. The site's acceptance into this program ensures authorized funding, enabling the site to be remediated to the level required by the Brownfields/Voluntary Cleanup Program within the estimated construction schedule. This program also ensures MDNR oversight throughout the project.

Comment: Comments of Cold War Era testing near the Pruitt-Igoe site were not properly documented and analyzed.

Response: *The U.S. Army Center for Health Promotion and Preventative Medicine acknowledged that the Pruitt-Igoe location was one of four locations within the St. Louis area that had undergone aerial spraying of Zinc Cadmium Sulfide in the late 1950s and early 1960s. They conducted health risk assessments in 1994 of this Cold War Era program following the declassification of test reports. In a letter from the Department of the Army to Senator Roy Blunt, dated October 18, 2012, the U.S. Army Public Health Command confirmed that the test conditions reported would not result in a health risk to humans. These reports contain no evidence of a radioactive component to dispersion testing. Furthermore, subsequent site testing of the proposed project area has shown no signs of radioactive or nuclear-related material. Per USACE Engineering Regulation 405-1-11, Section 3-14e(2), USACE cannot and will not acquire property that is contaminated.*

Comment: Light Pollution was not considered in the analysis

Response: *Lighting at the N2W Campus is a design consideration and will be contained within the site. The security lighting for the N2W Campus will not have impacts to the surrounding community and will be consistent with existing urban lighting. By design, the light at the security perimeter will not extend out to adjacent parcels and will be comparable to the lighting provided by a typical street light. Cost considerations for lighting are not significant and therefore would not result in favorable impact for any site over another. By designing for LEED certification, lighting at the N2W Campus will be designed to minimize energy consumption, and the Campus will use as little light as possible to meet mission requirements.*

Comment: The FEIS failed to analyze impacts to the surrounding community of an explosive arc of vehicle borne detonations at the campus perimeter.

Response: *The new campus will have numerous measures to deter an attack, thereby making this a low probabilistic event. Risks will be managed through security engineering and design features for the facility and campus, NGA police force routine patrols, perimeter cameras, and close coordination with the St. Louis police force with whom NGA has a long-standing relationship to protect the current campus.*

Comment: Community statements express concern that regional groups and Tribes, such as Tillie's Corner and The Osage Nation, have spoken out against the St. Louis City Site.

Response: *NGA and USACE are aware of the concerns regarding the St. Louis City Site and have actively engaged with these organizations during the National Historic Preservation Act Section 106 consultation process to develop appropriate avoidance and minimization measures addressing their concerns. Please see the Programmatic Agreement, which is included as Appendix A to the ROD and includes a discussion of these measures.*

7.0 Signature Page

A handwritten signature in blue ink, reading "R. Cardillo". The signature is fluid and cursive, with a prominent "R" and a stylized "C".

ROBERT CARDILLO

Director, National Geospatial-Intelligence Agency

8.0 Acronyms

AFB	Air Force Base
APA	Agency Preferred Alternative
BMP	best management practice
CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
DEIS	Draft Environmental Impact Statement
DoD	U.S. Department of Defense
DoDI	Department of Defense Instruction
EIS	environmental impact statement
EJ	environmental justice
E.O.	Executive Order
FEIS	Final Environmental Impact Statement
IT	information technology
MDNR	Missouri Department of Natural Resources
N2W	Next NGA West
NEPA	National Environmental Policy Act
NGA	National Geospatial-Intelligence Agency
ROD	Record of Decision
SHPO	State Historic Preservation Office or Officer
SST	Site Selection Team
UFC	Unified Facilities Criteria
USACE	U.S. Army Corps of Engineers
USAF	U.S. Air Force
U.S.C.	United States Code

Appendix A

Programmatic Agreement with State Historic Preservation Office

Appendix B
Final Environmental Impact Statement Errata
Sheet
