1.0 Introduction and Purpose and Need for the Proposed Action

1.1 Introduction

The United States (U.S.) General Services Administration (GSA), as lead agency, with the Federal Bureau of Investigation (FBI), the National Capital Planning Commission (NCPC), and the National Park Service (NPS) as cooperating agencies, prepared this Draft Environmental Impact Statement (Draft EIS) to guide the evaluation of alternatives for a new, permanent location for a proposed consolidated FBI Headquarters (HQ). GSA has prepared this Draft EIS in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] 4321 et seq.), the Council on Environmental Quality (CEQ) implementing regulations (40 Code of Federal Regulations [CFR] §1500-1508), and GSA’s Public Buildings Service (PBS) NEPA Desk Guide (1999).

The FBI was established in 1908 through a combination of legislative and executive action during the presidency of Theodore Roosevelt. Since its inception, the FBI has grown to become an intelligence-driven and threat-focused national security organization with both intelligence and law enforcement responsibilities. The FBI is tasked with protecting and defending the U.S. against terrorist and foreign intelligence threats; upholding and enforcing the criminal laws of the U.S.; and providing leadership and criminal justice services to Federal, state, municipal, and international agencies and partners.

The FBI has occupied the J. Edgar Hoover (JEH) building, located at 935 Pennsylvania Avenue NW, Washington, D.C., since the building was completed in 1974. However, since 1974, the mission and operations of the FBI have expanded such that numerous other leased facilities in the National Capital Region (NCR) are required to fulfill its HQ functions. The mission of GSA is to deliver the best value in real estate, acquisition, and technology services to government and the American people. Given that the FBI does not have any general authority to acquire real property, the FBI has requested that GSA exercise its authority to acquire property to address FBI’s need for a consolidated HQ that meets the agency’s security requirements and transportation needs and provides space that would efficiently and effectively support the agency’s current and future mission, workforce, and operational requirements.¹

NCPC is the Federal Government’s planning agency for the NCR, and its work is centered on comprehensive planning, Federal capital improvements, the review and approval of Federal plans and projects, and special initiatives. NCPC also coordinates the planning efforts of Federal agencies that construct and renovate facilities within the NCR, represents the Federal Government on a number of local and regional planning boards, and encourages public participation in all aspects of the agency’s work.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. This includes parks throughout the United States as well as public spaces in the NCR.

1.2 Description of the Proposed Action

This project would leverage the value of the approximately 6-acre JEH parcel and exchange it for a complex that can accommodate the FBI’s entire HQ operations in one location. This new complex would be built by an exchange partner chosen by GSA and FBI on one of the three sites that have been identified as best meeting the criteria summarized in section 1.4 and closely examined in this Draft EIS.

The Proposed Action would encompass two parts:

- Acquisition of a consolidated FBI HQ at a new permanent location; and
- Exchange of the JEH parcel.

¹ Executive Order (EO) 12072: Federal Space Management requires that “site selection and space assignments take into account the management needs for consolidation of agencies or activities in common or adjacent space in order to improve administration and management and effect economies.”
The Proposed Action would allow GSA to leverage its current assets in exchange for property to support the space consolidation efforts of GSA and FBI. The exchange would convey the JEH parcel to the private sector, whose redevelopment would be consistent with local land use controls and redevelopment goals for Pennsylvania Avenue.

GSA would rely on various authorities to implement the exchange, including 40 U.S.C. §3304, which authorizes GSA to seek donated sites or no-cost assignable purchase options for sites. In addition, 40 U.S.C. §581(c) allows GSA to acquire, by purchase or otherwise, real estate and interests in real estate to meet the FBI’s space needs through exchange of the current HQ facility. GSA would notify and coordinate with its oversight and authorization committees in the context of an exchange. Section 2.4 contains a detailed description of the exchange process.

After careful review against Federal site evaluation criteria, three sites within the NCR (figure 1-2) were selected to comprise a short list of sites to be considered for the consolidation of the FBI HQ (refer to figure 1-1 for a regional overview of the respective sites). The site alternatives analyzed in the Draft EIS include:

- **Greenbelt**: This site is known as the Greenbelt Metro Station and is located near the intersection of Interstate I-495 and the Greenbelt Metrorail Station (exit 24) in Prince George’s County, Maryland (figure 1-3).

- **Landover**: This site is known as the former Landover Mall and is located along Brightseat Road near the intersection of I-495 and Landover Road (exit 17) in Prince George’s County, Maryland (figure 1-4).

- **Springfield**: This site is known as the GSA Franconia warehouse complex (GSA warehouse complex) and is located along Loisdale Road just south of the Franconia-Springfield Parkway overpass and east of I-95 in Fairfax County, Virginia (figure 1-5).
1.3 Purpose & Need for the Proposed Action

The purpose of the Proposed Action assessed in the Draft EIS is the consolidation of the existing FBI HQ into one location within the NCR to provide the FBI with an HQ complex that meets the Interagency Security Committee (ISC) Level V security standards. This standard is reserved for agencies with mission functions that are critical to national security or the continuation of government.

As previously stated, the FBI has occupied the JEH building since its completion in 1974. However, since that time, the mission and operations of the FBI have evolved in such a way that multiple leased facilities across the NCR are required to fulfill its HQ and mission functions. As a result, a consolidated FBI HQ is needed to support information sharing, collaboration, and the integration of strategic priorities. Currently, the aging JEH building houses only 52 percent of HQ staff with the remainder dispersed over multiple locations in the NCR. Fragmentation resulting from FBI HQ’s multiple locations diverts time and resources from investigations, hampers interoffice coordination, and decreases flexibility. Dispersion across multiple locations also gives rise to redundancy in operations and inefficient use of space. The consolidation is needed to eliminate redundancies and provide for significant space savings.

The Proposed Action is also necessary to provide an FBI HQ that adheres to ISC Level V facility standards. Currently, FBI HQ elements are housed in the JEH building and in multiple locations throughout the NCR that do not meet ISC Level V facility standards. The FBI requires a complex that supports its mission and allows it to defend against terrorists, weapons of mass destruction, and other threats. Additionally, as an integral agency for the management of intelligence and national security programs, the FBI needs an HQ that provides highly reliable utilities and infrastructure.

1.4 Project Background

Several studies have been developed related to the consolidation of the FBI HQ dating back to 2004, when the Director of the FBI requested that GSA recommend a strategy for consolidation. Over the following 2 years, GSA commissioned studies that estimated the cost of renovation and/or disposition of the JEH building. In 2009, Congress directed the U.S. Government Accountability Office (GAO) to review the security and design deficiencies of the JEH building and FBI HQ off-site locations. This report was issued in November 2011; a subsequent security assessment conducted by the FBI further documented threats and analyzed building security requirements consistent with ISC security standards. These reviews demonstrated the need for a new consolidated FBI HQ complex.

In December 2011, the Senate Committee on Environment and Public Works (EPW) adopted a resolution authorizing GSA to acquire a consolidated FBI HQ. This resolution required the following:

- GSA must utilize a ground lease-leaseback transaction to ensure the acquisition results in eventual Federal Government ownership
- The consolidated FBI HQ must be on a Federally owned site
- The site must provide for ISC Level V facility
- The site must be located within 2 miles from a Metrorail station and 2.5 miles from the National Capital Beltway
- The building must not exceed 2.1 million rentable square feet (RSF) to house 11,055 people, with an office utilization rate not greater than 109 usable square feet (USF)/person and 174 USF/person overall
- The project must include no more than 4,300 parking spaces

As a result, GSA issued a Request for Information (RFI) in January 2013 to solicit ideas from members of the development community, local and state jurisdictions, and other interested parties regarding feasibility, issues, and considerations of the proposed transaction structure. The 38 responses to the RFI helped to inform GSA and FBI’s strategic planning for the project.

In November 2013, the RFI was followed by a Request for Expressions of Interest (REOI) for sites within the NCR to be considered for the development of a new FBI HQ. The REOI advertisement signaled the beginning of the site evaluation process, described in detail in section 2.3.

As of the beginning of the site evaluation process, described in detail in section 2.3.

NATIONAL CAPITAL REGION (NCR)

The NCR encompasses Washington, D.C., Montgomery and Prince George’s Counties in the State of Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties in the Commonwealth of Virginia; and all cities within the boundaries of those counties (Figure 1-5). In addition to the concentration of Federal employees and facilities in the NCR, this region’s focal point, Washington, D.C., is the symbolic heart of the nation. It provides a sense of permanence and centrality and holds historic and cultural significance for the entire nation.

GSA would rely on the following authorities to implement the consolidation of FBI HQ and the exchange of the JEH parcel, including:

- 40 U.S.C. §3304
- 40 U.S.C. §584
- 40 U.S.C. §581(c)

There are two primary decisions to be made by GSA in coordination with FBI and NCPC as cooperating agencies:

- Whether or not to consolidate FBI HQ through the exchange of JEH, and
- To consolidate FBI HQ at either the Greenbelt, Landover, or Springfield site.
1.5 NEPA Process

NEPA establishes national policy for the protection of the environment. In 1978, CEQ issued Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR §1500-1508) to assist Federal agencies in complying with the provisions of NEPA. The major objectives of NEPA are to ensure the careful consideration of environmental effects of Proposed Actions in the Federal decision-making process and to disclose that information to the public. Furthermore, NEPA procedures require Federal agencies to evaluate reasonable alternatives that would avoid or minimize adverse impacts prior to making a decision and before proceeding with the action. There are two primary decisions to be made by GSA in coordination with FBI and NCPC, as cooperating agencies. First, GSA would decide whether or not to consolidate FBI HQ through the exchange of JEH, and second, to consolidate FBI HQ at either the Greenbelt, Landover, or Springfield site.

There are three levels of environmental review under NEPA: Categorical Exclusion (CE), Environmental Assessment (EA), and Environmental Impact Statement (EIS). Federal agencies must determine the appropriate level of NEPA review by evaluating an action’s potential to result in significant impacts. GSA, as Lead Agency, in conjunction with the FBI, NCPC, and NPS, as cooperating agencies, determined that an EIS would be performed to appropriately analyze potential significant impacts of the Proposed Action. The major steps of the NEPA process are outlined in figure 1-6.

1.6 Public Involvement

Public involvement is one of the cornerstones of the NEPA process. As specified in Title 40 CFR Part 1500.1(b), NEPA requires Federal agencies to make diligent efforts to involve the public before reaching a project decision. Public input is critical to allow public officials to make informed decisions. There are several opportunities throughout the EIS process for the public and government agencies to be informed about the Proposed Action and provide input to the Lead Agency.
The Notice of Intent (NOI) was published in the Federal Register on September 8, 2014, to notify the public of GSA’s intent to prepare an EIS for the proposed FBI HQ consolidation. The publication of the NOI initiated the scoping process, which is a procedural requirement of NEPA that serves to identify the full range of environmental issues and alternatives to be evaluated in an EIS (40 CFR §1501.7). The scoping process provides an opportunity for the public and agencies to learn about the Proposed Action and alternatives and to comment on potential environmental issues to be addressed in the EIS. The public scoping comment period began on September 8, 2014, with the publication of the NOI and continued through October 23, 2014. Open-house style public meetings were held at the following locations:

- Springfield, Virginia: Robert E. Lee High School on September 22, 2014
- Greenbelt, Maryland: Greenbelt Branch Library Auditorium on September 23, 2014
- Existing FBI HQ: District Architecture Center on October 1, 2014
- Landover, Maryland: Prince George’s Sports and Learning Complex on October 2, 2014

The public and agencies were notified of the scoping period and scoping meeting through publications in the Federal Register, advertisements in local newspapers, the project website (http://www.gsa.gov/fbi-hq-consolidation), via social media, and scoping letters and mailings to interested parties. Refer to chapter 9, Public Involvement, for a detailed summary of the scoping activities and other public involvement undertaken for the project.

As a second opportunity for public input, agencies and members of the public are encouraged to provide written comments on the Draft EIS during the 45-day comment period.

Please send written comments on the Draft EIS to:

U.S. General Services Administration
Attention: Ms. Denise Decker, NEPA Lead
Office of Planning and Design Quality
7th Street SW, Room 4004
Washington, D.C. 20407
fbi-hq-consolidation@gsa.gov

During the preparation of the Draft EIS, GSA and the FBI have consulted with numerous agencies and organizations to provide information on the proposed undertaking, identify potential issues, and solicit information related to the preparation of the Draft EIS. The following agencies were consulted during the preparation of this Draft EIS:

**FEDERAL**
- Advisory Council on Historic Preservation (ACHP)
- Federal Highway Administration (FHWA)
- U.S. Commission of Fine Arts (CFA)
- U.S. Environmental Protection Agency (EPA)
- National Park Service (NPS)
- U.S. Fish & Wildlife Service (USFWS)
- U.S. Army Corps of Engineers (USACE)
- National Capital Planning Commission (NCPC)

**STATE**
- DC State Historic Preservation Office (DC SHPO)
- DC Office of Planning (DCOP)
- DC Department of Transportation (DDOT)
- Maryland State Highway Administration (Maryland SHA)
- Maryland Historical Trust (MD SHPO)
- Maryland Department of Business and Economic Development (MDBED)
- Maryland Department of Natural Resources (MDDNR)
- Maryland Department of the Environment (MDE)
- Virginia Department of Transportation (VDOT)
- Virginia Department of Historic Resources (VDHR)
- Virginia Department of Conservation & Recreation (DCR)

**REGIONAL & LOCAL**
- Fairfax County Department of Transportation (FCDOT)
- Maryland-National Capital Park and Planning Commission (M-NCPPC)
- Prince George’s County Department of Public Works & Transportation (DPW&T)
- Washington Metropolitan Area Transit Authority (WMATA)
1.7 Regulatory Background

Concurrent with the NEPA process and the preparation of the Draft EIS, GSA is engaged with local, state, and Federal agencies concerned with historic preservation to identify historic properties that may be potentially affected by the consolidation of the FBI HQ or the exchange of the JEH parcel, and to resolve any adverse effects of the Proposed Action. This consultation is being carried out under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. §300101 et seq., and in accordance with the 1996 Memorandum of Agreement (MOA) that transferred the authority of the Pennsylvania Avenue Development Corporation (PADC) to GSA, NPS, and NCPC.

Similar to NEPA, the NHPA of 1966, as amended through 2014, requires Federal agencies to consider the potential effects of their undertakings on historic resources, including historic buildings, districts, structures, and objects that have significant scientific, historic, or cultural value. NHPA establishes that it is the Federal agencies’ clear responsibility to protect and preserve any historic and prehistoric resources.
Section 106 of the NHPA requires Federal agencies to consider the effects of their proposed undertakings on these and any properties that are listed in or eligible to be listed in the National Register of Historic Places (NRHP). Section 106 also requires, as part of the historic review process, consultation with local and Federal agencies responsible for historic preservation as well as any local citizen groups interested in historic preservation. As part of GSA’s Section 106 responsibilities, GSA initiated consultation with the DC State Historic Preservation Office (SHPO) on February 6, 2015, and the Maryland and Virginia SHPOs on May 14, 2015. GSA has identified draft Areas of Potential Effect (APEs) for the Proposed Action, included as part of the initiation letters. Consultation with the SHPOs and other consulting parties is ongoing.

GSA is the Lead Agency for the proposed FBI HQ consolidation and exchange of JEH and the associated NEPA and NHPA compliance for both actions. The FBI is a partner in the site evaluation and is a cooperating agency for NEPA and a consulting party for any NHPA agreement that may be necessary for the new FBI HQ site. NCPC and NPS are cooperating agencies for NEPA and signatories for any NHPA agreement that may be necessary for the JEH parcel.

In addition to NEPA and Section 106, GSA must comply with other related applicable statutes, regulations, plans, and Executive Orders (EOs) throughout the EIS and design/development processes. These regulations include, but are not limited to, the regulations.

<table>
<thead>
<tr>
<th>EXECUTIVE ORDERS</th>
<th>PLANS</th>
</tr>
</thead>
<tbody>
<tr>
<td>• EO 11990 – Protection of Wetlands</td>
<td>• District of Columbia Bicycle Master Plan, District of Columbia Department of Transportation (2005)</td>
</tr>
<tr>
<td>• EO 13508 – Chesapeake Bay Protection and Restoration</td>
<td>• Capital Space Plan, NCPC (2010) Monumental Core Framework Plan</td>
</tr>
<tr>
<td>• EO 13186 – Responsibilities of Federal Agencies to Protect Migratory Birds</td>
<td>• GSA Fiscal Year (FY) 2014 Strategic Sustainability Plan</td>
</tr>
<tr>
<td>• EO 12072 – Federal Space Management</td>
<td>• GSA FY 2014 Climate Change Risk Management Plan</td>
</tr>
<tr>
<td>• EO 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations</td>
<td>• Department of Justice Strategic Sustainability Performance Plan (2010)</td>
</tr>
<tr>
<td>• EO 13287 – Preserve Americas</td>
<td>• 1974 Pennsylvania Avenue Plan (PAP), including the 1996 GSA, NCPC, and NPS MOA Memorandum of Agreement among GSA, NCPC, and NPS that identified responsibilities of each PADC successor agency (1996)</td>
</tr>
<tr>
<td>• EO 13006 – Locating Federal Facilities on Historic Properties in Our Nation’s Central Cities</td>
<td></td>
</tr>
</tbody>
</table>
ABOUT GSA

GSA's PBS acts as the landlord for the civilian Federal Government, acquires space on behalf of the Federal Government through new construction and leasing, and acts as a caretaker for Federal properties. In the NCR, GSA NCR manages approximately 43.9 million RSF of space in 205 Federally owned buildings. Of these buildings, 150 are listed or eligible to be listed as historic buildings in the NRHP and 7 are national landmarks. Additionally, GSA PBS manages 56.5 million RSF in 485 leased buildings. FBI has requested that GSA exercise its authority to consolidate existing FBI HQ operations into a new, permanent location that meets its security, transportation, and operational needs.

ABOUT FBI

The major priorities of FBI include protecting the U.S. against terrorist attacks, foreign intelligence operations, espionage, cyber-based attacks, and high-technology crimes; combating public corruption at all levels; protecting civil rights; combating transnational and national criminal organizations and enterprises; major white-collar and significant violent crime; supporting Federal, state, and local, and international partners; and upgrading technology to successfully perform FBI's mission.

The executives, special agents, and professional staff who work at FBI national HQ in Washington, D.C., direct, organize, and coordinate FBI activities around the world. This work includes setting the priorities and policies for the agency; ensuring centralization and coordination at the highest levels; helping lead the fight against terrorism by serving as a hub for intelligence and information; providing operational and administrative support to field divisions and overseas offices; coordinating the U.S. Intelligence Community's domestic counterintelligence and counter-terrorism activities; and taking the lead during times of national crisis or emergency, directing major cases and operations.

ABOUT NCPC

NCPC is the Federal Government’s planning agency for the NCR. The 12-member Commission meets monthly to adopt, approve, or provide advice on plans and projects that impact the nation’s capital and surrounding areas. The Commission is supported by a staff of planners, architects, urban designers, and other professionals. NCPC’s work is centered on comprehensive planning, Federal capital improvements, the review and approval of Federal plans and projects, and special initiatives. NCPC also coordinates the planning efforts of Federal agencies that construct and renovate facilities within the NCR; represents the Federal Government on a number of local and regional planning boards; and encourages public participation in all aspects of the agency’s work.

ABOUT NPS

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. This include parks throughout the United States as well as public spaces in the NCR.
1.8 Content and Structure of the EIS

The Draft EIS evaluates the potential for environmental impacts on the natural and built environment resulting from the Proposed Action and the No-action Alternative for each site. Potential direct, indirect, and cumulative impacts of each alternative are evaluated on the following resource categories: water, biological and earth resources; cultural resources; land use, zoning, public policy; visual resources; air quality and noise; public health and safety; hazardous materials; socioeconomics and environmental justice; transportation; infrastructure and utilities; and greenhouse gas emissions and air quality. Measures to mitigate potential adverse impacts, where appropriate, are also identified in the document.

The analysis of environmental impacts for each of the three alternatives is based on conceptual site plans informed by both site planning principles and design requirements based on FBI program needs. These site plans are conceptual in nature and represent a program-compliant layout that would yield the most conservative estimate of the environmental impacts associated with each alternative. Ultimately, the layout and design of the proposed FBI HQ could potentially be altered during the final design process with the selected exchange partner. GSA would perform supplemental NEPA analysis, as necessary, if there is substantial variance from what is considered in this EIS.

This EIS also addresses potential redevelopment scenarios for JEH to ultimately be implemented by a third party. It should be noted that this Draft EIS does not evaluate the potential environmental impact associated with the backfilling of other leased sites occupied by the FBI, should they be vacated as part of the HQ consolidation process.

This Draft EIS includes the following sections:

Chapter 1 provides an introduction, purpose, and need for the Proposed Action, as well as the NEPA and public involvement process.

Chapter 2 presents the Proposed Action and project alternatives and provides a summary of the site selection and site planning process. A description of the exchange process and the Reasonably Foreseeable Development Scenarios (RFDSs) for the future development of the JEH parcel are also described.

Chapter 3 describes the criteria for determining and measuring impacts as well as the regulatory background for each resource category.

Chapter 4 describes affected environment and environmental consequences associated with the exchange of the JEH parcel and RFDSs.

Chapter 5 describes the affected environment and environmental consequences and potential mitigation and permitting requirements associated with the Greenbelt Alternative.

Chapter 6 describes the affected environment and the environmental consequences and potential mitigation and permitting requirements associated with the Landover Alternative.

Chapter 7 describes the affected environment and identifies the environmental consequences and potential mitigation and permitting requirements associated with the Springfield Alternative.

Chapter 8 describes the cumulative and unavoidable adverse impacts associated with all action alternatives as well as climate change considerations for the project.

Chapter 9 details public involvement and agency coordination activities that have taken place during public scoping and the development of the EIS.

Chapter 10 provides a list of individuals who prepared the document.

Chapter 11 provides the distribution list for the Draft EIS.

Chapter 12 provides a list of acronyms and an index of keywords used in the EIS.

Chapter 13 provides a list of references.

Five technical appendices accompany this EIS, as follows:

Appendix A: Public Scoping and Agency coordination (correspondence with local, state, and regional agencies; letters received during the public scoping period; Section 106 consultation)

Appendix B: Transportation Impact Analysis (TIA) for the JEH parcel

Appendix C: TIA for the Greenbelt site

Appendix D: TIA for the Landover site

Appendix E: TIA for the Springfield site

Appendix F: Air Quality Technical Report