FINDING OF NO SIGNIFICANT IMPACT
FOR THE CONSOLIDATION OF U.S. CITIZENSHIP AND IMMIGRATION SERVICES HEADQUARTERS

In accordance with the National Environmental Policy Act (NEPA), Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), U.S. General Services Administration (GSA) Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide, I find that the proposed consolidation of the U.S. Citizenship and Immigration Services Headquarters in Camp Springs, Maryland, as described in the attached Environmental Assessment (EA), is not a major Federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement will not be prepared.

APPROVED: _________________________              _    Date:______________  
Mary D. Gibert  
Regional Commissioner  
Public Buildings Service  
U.S. General Services Administration  
National Capital Region

This FONSI will become final 15 days after publication of its Notice of Availability in The Washington Post and the Prince George’s Post provided that no information leading to a contrary finding is received or comes to light during the 15-day review period.
BASIS FOR FINDING

GSA prepared an environmental assessment (EA) in cooperation with the U.S. Citizenship and Immigration Services (USCIS) analyzing the environmental impacts that could result from consolidating the USCIS Headquarter offices in Washington, DC and Northern Virginia. The EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500-1508), GSA Order ADM 1095.1F: Environmental Considerations in Decision Making, and the Public Buildings Service NEPA Desk Guide. The EA documents the direct, indirect, and cumulative impacts for the action alternative and a no-action alternative.

The environmental issues addressed in the EA were identified through internal scoping and analysis; which included site visits, review of environmental documentation, and site information provided by the offerors. Based on this information, an EA was prepared. The Final EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

I. PURPOSE OF AND NEED FOR THE PROPOSED ACTION

GSA is proposing to acquire space through leasing in order to co-locate six of USCIS’ current leased locations in Washington, DC and Northern Virginia into one lease location to improve functional efficiency. GSA will enter into a lease agreement for up to 575,000 rentable square feet of space and will co-locate approximately 3,200 employees in Camp Springs, Maryland. The delineated area for the lease is Northern Virginia (Crystal City/Pentagon City), Southern Prince George’s County in Maryland (South of Route 4), and Washington, DC (Downtown, Southwest, Capitol Riverfront Business Improvement District, Southeast, St. Elizabeths East Campus; Parkside, North of Massachusetts Avenue; and Waterfront), which is found in the GSA Request for Lease Proposals (RLP) 2DC0546. The Proposed Action will consolidate USCIS’ multiple headquarters offices into one location in order to provide necessary security measures and provide collaboration and cohesiveness amongst USCIS.

II. DESCRIPTION OF ALTERNATIVES

Two alternatives were considered in detail in this EA, an action alternative and a no-action alternative. These alternatives are summarized below.

Alternative 1: No-Action Alternative

Under the No-Action Alternative, the consolidation of USCIS Headquarters at six leased locations across Washington, DC and Northern Virginia would not occur. USCIS would remain in leased space at 111 Massachusetts Avenue, NW; 20 Massachusetts Avenue, NW; 131 M Street, NE; 1200 First Street, NE; 633 Third Street, NE, Washington, DC; and 2121 Crystal Drive, Arlington, VA. No change
to their existing leases and current management and maintenance routines would occur. It is assumed that the developer/owner would address necessary repairs as they arise.

Under the No-Action Alternative, because the proposed project site has received approval for development from the Prince George’s County Office of Planning, it is assumed that the proposed project site would be developed even if the Federal government were not to issue a lease for this site. Implementation of the No-Action Alternative would not provide USCIS with a consolidated and more efficient work environment.

**Action Alternative: One Town Center Site**

The One Town Center site is located in Camp Springs, Maryland in Prince George’s County. The proposed project site is located on an approximately 10.7-acre parcel of undeveloped land. Currently, approximately half of the parcel is wooded and the other half is heavily vegetated with grasses, shrubs, and small trees. The proposed project site is within approximately 1,385 walkable linear feet (approximately ¼-mile) from the entrance to the Branch Avenue Metrorail Station, located on the Green Line. To accommodate the requirements of the RLP, this site will need to be cleared, graded, and a new building and parking garage built.

The developer has proposed a four-story building consisting of approximately 581,000 gross square feet (GSF). A six-story structured parking garage will be provided that will include approximately 1,400 parking spaces, some of which will be designated for USCIS employees and visitors. Eight parking spaces will be reserved for GSA fleet vehicles.

**III. ENVIRONMENTAL CONSEQUENCES**

The direct, indirect, and cumulative impacts of the alternatives are analyzed in Chapter 3, Affected Environment and Impacts to the Human Environment, of the EA.

No significant short-term or long-term adverse impacts to the natural, social, or cultural environment will occur under the Action Alternative. Please refer to Chapter 3 of the attached EA for more specific information on the impacts. While the mitigation proposed is not required to reduce impacts below a level of significance, GSA is proposing to undertake the following measures.

**Wetlands and Streams**

An Erosion and Sediment Control Plan (ESCP) and Stormwater Pollution Prevention Plan (SWPPP) will be developed in accordance with Maryland Department of the Environment (MDE) regulations for construction activities and
maintained onsite throughout construction. The erosion and sediment control plan and SWPPP will outline Best Management Practices (BMPs) including but not limited to silt fence, hay bales, and revegetation of exposed sediment, which will be employed throughout construction. These BMPs will reduce the amount of eroded sediment entering wetlands and streams during construction.

Aquatic Biota

An ESCP and SWPPP will be developed in accordance with MDE regulations for construction activities and maintained onsite throughout construction. The ESCP and SWPPP will outline BMPs including but not limited to silt fence, hay bales, and revegetation of exposed sediment, which will be employed throughout construction. These BMPs will reduce the amount of sediment entering local waterways thereby protect aquatic biota.

Climate Change

The proposed USCIS Headquarters building will be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®- CI. These buildings standards will result in reduced emissions in the region. The leased building must also earn the ENERGY STAR® label conferred by the US EPA, which will also reduce energy demand and emissions.

GSA, in coordination with USCIS, will develop a transportation management plan (TMP) which will outline transportation design management (TDM) strategies that will encourage employees to utilize other commute methods besides driving alone. USCIS will implement the TDM strategies in order to reduce the number of cars traveling to the proposed project site and therefore reduce overall vehicle emissions.

Noise

A noise pollution control plan will be prepared and implemented to protect adjacent public areas from excessive noise impacts during construction. Additionally, noise-reducing building materials including soundproofing windows and insulation will be used to protect USCIS employees from exterior noise pollution sources.

Environmental Contamination

Prior to construction, the developer/owner will remove the petroleum impacted soils from the site separately from other excavated materials. The soils will be characterized and disposed of in accordance with local, state and federal
regulations. During construction, a site safety plan will be developed and employed to keep site workers from direct contact with contaminated soils.

**Soil**

Prior to construction, the developer/owner will remove the petroleum impacted soils from the site separately from other excavated materials. The soils will be characterized and disposed of in accordance with local, state and federal regulations. An ESCP and SWPPP will be developed in accordance with MDE regulations for construction activities and maintained onsite throughout construction. The ESCP and SWPPP will outline BMPs including but not limited to silt fence, hay bales, and revegetation of exposed sediment, which will be employed throughout construction. These BMPs will reduce the amount of soil loss from erosion during construction.

**Groundwater & Hydrology**

The amount of impervious surface proposed at the proposed project location will be minimized as much as practicable. The developer/owner will be required to leave at least 10 percent of the site as open space which will allow for groundwater recharge. An ESCP and SWPPP will be developed in accordance with MDE regulations for construction activities and maintained onsite throughout construction in order to prevent the transport of contaminants to groundwater. Integrated pest management techniques will be used during landscaping and turf maintenance to reduce the potential for altering groundwater quality.

Prior to construction, the developer/owner will remove the petroleum impacted soils from the site separately from other excavated materials. The soils will be characterized and disposed of in accordance with local, state and federal regulations. Groundwater will not be used for either potable or industrial purposes at the proposed USCIS Headquarters building.

**Stormwater Management**

The majority of water quality volume retention will be provided by environmental site design (ESD) consisting of 31 approved micro-bioretention facilities, including a combination of graded micro-bioretention ponds, planter boxes, and Filterra units. The fire lane along the southeast edge of the parking garage will be constructed with pervious pavement or reinforced turf. The remaining water quality volume not provided through ESD will be directed to an underground stormwater management facility located underneath the fire lane along the southeast edge of the proposed parking garage. Stormwater overflow from a
100-year storm event will be directed to the adjacent WMATA stormwater pond to the east.

An ESCP and SWPPP will be prepared in accordance with MDE regulations for construction activities and maintained onsite throughout construction. These plans will include a description of BMPs to minimize erosion and off-site sedimentation during construction.

**Vegetation and Wildlife**

More than 10 percent of the proposed project site will be retained as open space. The developer/owner will plant a minimum of 129 shade trees and 86 ornamental trees in accordance with the 2010 Prince George’s County Landscape Manual. Trees and other landscaping will consist of native plant species to the extent feasible, at a minimum of 50 percent for shade and ornamental trees and 30 percent for evergreens.

The developer/owner will minimize impacts to vegetation and wildlife by limiting the area of ground clearing for structural components (e.g., building, parking lot). Open space with no plans for development will not be used for staging or other construction-related clearing unless it is the only feasible option. Open areas to remain on the site will be re-vegetated and/or landscaped after construction. Site landscaping will consist of native plant species to the extent feasible. If any nests are present on-site, a Migratory Bird Permit will be obtained from the USFWS.

**Community Facilities**

The proposed USCIS Headquarters building will be designed in accordance with national fire protection standards and will be subject to building code compliance inspections prior to and during occupancy of the building. A noise pollution control plan will be prepared and implemented to protect adjacent public areas from excessive noise impacts during construction. This plan will include time-of-day restrictions, periodic noise monitoring, use of sound attenuation barriers or other devices, inspections of construction vehicle exhaust systems, idling restrictions within and outside of construction limits, warning signage, and public posting of a phone number that allows public concerns to be placed to the project manager. Additionally, noise-reducing building materials including soundproofing windows and insulation will be used to protect USCIS employees from exterior noise pollution sources.
Safety and Security

Access to the USCIS Headquarters building will be restricted to USCIS employees and visitors, and security checkpoints will be in place to control vehicular and pedestrian access. Measures that will be taken to provide a secure campus include, but are not limited to:

- Vehicular barrier system
- Minimum setback distances from the building
- Separate visitor screening area
- Well-lit parking and pedestrian areas equipped with 24-hour video surveillance
- Perimeter Security

The site design for the proposed USCIS Headquarters building will comply with the Interagency Security Committee Level IV standards for leased space.

Traffic and Transportation

GSA, in coordination with USCIS, will develop a TMP which will outline TDM strategies that will encourage employees to utilize other commute methods besides driving alone. USCIS will implement the TDM strategies in order to reduce the number of cars traveling to the proposed project site and therefore reduce impacts to the local roadway network.

Air Quality

The developer/owner will be required to adhere to accepted state and local construction site air quality control measures in the handling of materials and as part of grading activities. The developer/owner will also be required to implement a dust abatement/emissions control plan for construction activities. BMPs to reduce emissions from construction equipment and control fugitive dust include water spraying of access roads and stockpiles, placing dust covers on vehicles that transport dust-emitting materials, and keeping disturbed areas to a minimum by developing the site in stages, all of which have been shown to be effective in controlling emissions.

GSA, in cooperation with USCIS, will develop a TMP which will outline TDM strategies that will encourage employees to utilize other commute methods besides driving alone. USCIS will implement the TDM strategies in order to reduce the number of cars traveling to the proposed project site and therefore reduce impacts to air quality.

The proposed USCIS Headquarters building will be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of
LEED®-CI. These buildings standards will ensure that indoor air quality is maximized and will result in reduced emissions in the region.

Utilities

The proposed USCIS Headquarters building will be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®-CI which will minimize the adverse impact to utilities. The proposed building will include water-efficient landscaping and fixtures that will reduce potable water usage by 30 percent. Groundwater would not be used for either potable or industrial purposes at the proposed USCIS Headquarters building. The Washington Suburban Sanitation Commission (WSSC) would provide water utilities to the building. Other sustainable design measures will include high-efficiency lighting, modern and efficient heating and cooling equipment, and ENERGY STAR® appliances. A combination ESD and structural methods will be implemented to retain and treat stormwater onsite, which will reduce stormwater discharges to public storm drains to below current levels. In addition, potable water consumption will be reduced by 2 percent through 2025.

Waste Management

To meet the objectives of EISA and EO 13693, as well as the Prince George’s County Code and the Ten-Year Plan, the developer/owner will be required to divert recyclable material from the municipal solid waste to the maximum extent practical and to reduce construction waste by recycling and reusing materials whenever possible. Recyclable and non-recyclable waste generated during construction will be disposed of at licensed facilities and will be the responsibility of the developer/owner. The developer/owner will be required to operate the USCIS Headquarters facility in a sustainable and waste-efficient manner in accordance with EISA and EO 13693.