

1.0 INTRODUCTION

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1.1 WHY IS THIS DOCUMENT BEING PREPARED?

This Draft Environmental Impact Statement (EIS) has been prepared by the U.S. General Services Administration (GSA) to assess the potential impacts that would result from the implementation of the proposed Master Plan for the U.S. Department of Homeland Security (DHS) at the Nebraska Avenue Complex (NAC) in Northwest, Washington, D.C. The NAC Master Plan meets the objectives of the DHS National Capital Region (NCR) Housing Master Plan which proposes to consolidate over 28,000 DHS employees currently housed more than 40 locations into approximately 7 to 10 locations. The NAC site is one of the primary sites identified for the consolidation of certain DHS components.

The National Environmental Policy Act (NEPA) requires federal agencies to prepare an EIS for actions that may significantly affect the quality of the human environment [40 Code of Federal Regulations (CFR) 1502.2 (1978)]. GSA has prepared this Draft EIS to assess the impacts of implementing the proposed Master Plan on both natural and man-made environments. NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken (40 CFR 1500.1 (b)). This Draft EIS is being prepared in compliance with NEPA of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], the National Historic Preservation Act (NHPA) of 1966, as amended, GSA's PBS *NEPA Desk Guide*, and GSA's *Preservation Desk Guide*.

In addition, this Draft EIS provides information on impacts to historic resources required by Section 106 of the NHPA of 1966. Under NHPA, GSA must evaluate the action impacts to historic resources and evaluate potential effects to any district, site, building, structure, or object listed in, or eligible for listing in, the National Register of Historic Places (NRHP).

The **National Environmental Policy Act** is the legislation establishing national policy for protecting and enhancing the environment. Under NEPA, federal agencies must follow established procedures for determining the potential impacts of federal actions, including federal projects.

The **National Register of Historic Places** is the nation's official list of cultural resources worthy of preservation. Properties listed in the Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture.

The NAC site has been determined eligible for listing in the National Register as a historic district and a draft nomination is being developed. The site is significant in the areas of education (during the period of 1916 – 1942) and military (during the period of 1943 – 1952) history. The impacts that the Master Plan would have on historic resources are described in Chapter 3: Affected Environment and Impacts to the Human Environment.

1.2 WHAT IS BEING CONSIDERED IN THIS DOCUMENT?

This Draft EIS analyzes the impacts from three action alternatives and a No Action Alternative. Potential environmental impacts are described for each of the alternatives, including short-term construction-related impacts and long-term operational impacts. Cumulative impacts resulting from the implementation of the proposed action concurrent with other existing and planned projects are also discussed. In addition, mitigation measures are suggested to address identified impacts. The study area for the assessment of impacts is generally within a quarter-mile radius of the site, however, this area may expand or contract based on the resource discipline.

Written comments on the Draft EIS may be sent to:

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Comments on the Draft EIS must be postmarked by March 1, 2010.

1.3 WHAT OTHER ENVIRONMENTAL LAWS AND REGULATIONS ARE RELEVANT TO THIS PROJECT?

In addition to NEPA and NHPA, GSA must also comply with many statutes, regulations, plans, and Executive Orders (EOs) when developing a federal property such as the NAC. GSA is incorporating compliance with these laws and regulations into their project planning and NEPA compliance. Table 1-1 lists the statutes, regulations, plans, EOs, and Presidential Memorandums relevant to this project.

Table 1-1 Statutes, Regulations, Plans, Executive Orders, and Presidential Memorandums

Statutes
National Environmental Policy Act (NEPA) of 1969
Clean Air Act (CAA) of 1970 as amended
Clean Water Act (CWA) of 1977 as amended
Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980
Archaeological Resources Protection Act (ARPA) of 1979
Endangered Species Act of 1973
Section 5 of the National Capital Planning Act of 1952
Resource Conservation and Recovery Act (RCRA) of 1976
National Energy Conservation Policy Act of 1978
National Historic Preservation Act (NHPA), as amended through 2006
Noise Control Act of 1972
Archaeological and Historic Preservation Act (AHPA) of 1974
Energy Independence and Security Act of 2007
Regulations
Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508)
36 CFR Part 800 – Protection of Historic Properties

Regulations continued
32 CFR Part 229 – Protection of Archaeological Resources: Uniform Regulations
40 CFR 6, 51, and 93 – Conformity of General Federal Actions to State or Federal Implementation Plans
33 CFR 320-330 – U.S. Army Corps of Engineers Regulations
40 CFR Parts 300 through 399 – Hazardous Substance Regulations
Secretary of the Interior Standards and Guidelines for Archeology and Historic Preservation
Plans
Comprehensive Plan for the National Capital: Federal Elements, National Capital Planning Commission (2004)
Comprehensive Plan for the National Capital: District Elements, District of Columbia Office of Planning (2006)
District of Columbia Bicycle Master Plan, District of Columbia Department of Transportation (2005)
CapitalSpace Plan, National Capital Planning Commission (2010)
U.S. General Services Administration FY 2010-2015 Sustainability Plan (2010)
Department of Homeland Security Strategic Sustainability Performance Plan (2010)
Executive Orders
Executive Order 11593 – Protection and Enhancement of the Cultural Environment
Executive Order 11988 – Floodplain Management
Executive Order 11990 – Protection of Wetlands
Executive Order 12898 – Environmental Justice
Executive Order 13287 – Preserve America
Executive Order 13327 – Federal Real Property Asset Management
Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management
Executive Order 13508 – Chesapeake Bay Protection and Restoration
Executive Order 13514 – Federal Leadership in Environmental, Energy, and Economic Performance
Presidential Memorandums
Disposing of Unneeded Federal Real Estate – Increasing Sales Proceeds, Cutting Operating Costs, and Improving Energy Efficiency (June 10, 2010)

1.4 WHAT IS THE NEBRASKA AVENUE COMPLEX MASTER PLAN?

The proposed NAC Master Plan provides the blueprint for development on site in order to accommodate additional DHS employees and to serve as one of the main locations for DHS consolidation. It is intended that the Master Plan would guide future renovation and development of a cohesive campus through 2020 by establishing design and land-use planning principles for the construction of new buildings, roadways, open green space, utility systems, and other infrastructure needs, while minimizing environmental, economic, and social impacts. The NAC Master Plan is needed to support the goals of the DHS NCR Master Housing Plan which proposes to consolidate approximately 28,000 DHS employees currently housed in more than 40 locations into approximately 7 to 10 locations.

A range of alternatives with varying densities – from 3,700 to 4,500 seats at the site – are being analyzed in this Draft EIS. The current DHS population at the NAC is 2,390 seats. Each alternative includes a mixture of major building renovations, demolition and new construction, resulting in a total density from over 1.07 million GSF within the low-density alternative to approximately 1.31 million GSF within the high-density alternative. Pursuant to NEPA, a No Action Alternative is also being analyzed in this Draft EIS.

1.5 WHERE IS THE SITE LOCATED?

The NAC is a 37.39-acre site located at 3801 Nebraska Avenue, NW, Washington, D.C., within a largely residential section of northwest Washington, D.C. The campus is adjacent to Glover-Archbold Park, the Gatesly House, the Washington bureau of NBC Television, and American University (AU). The site is less than 0.75 miles from the Tenleytown-AU Metrorail Station. See Figure 1-1 and Figure 1-2 for the location of the NAC.

Figure 1-1 Location of the Nebraska Avenue Complex within Washington, D.C.

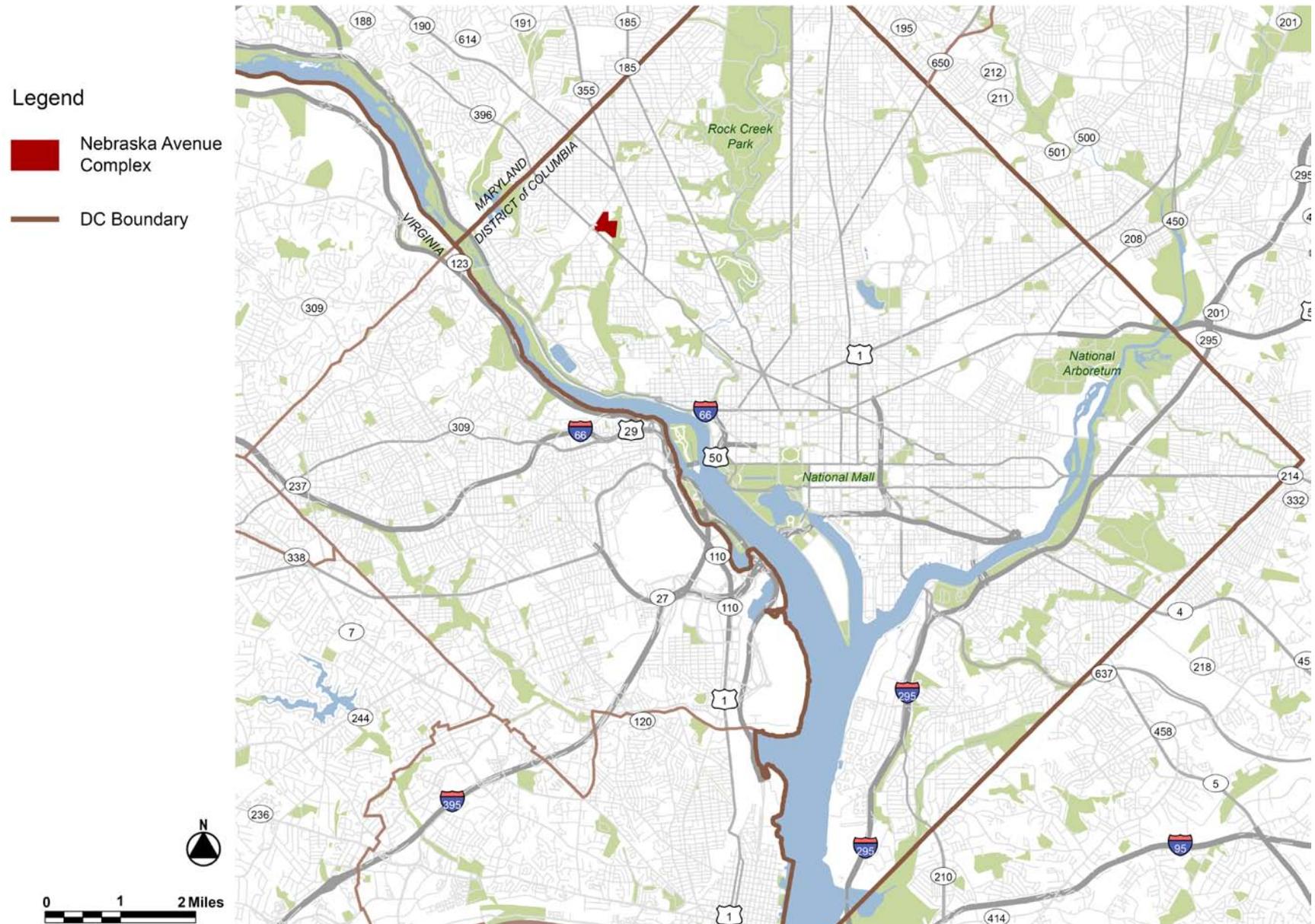
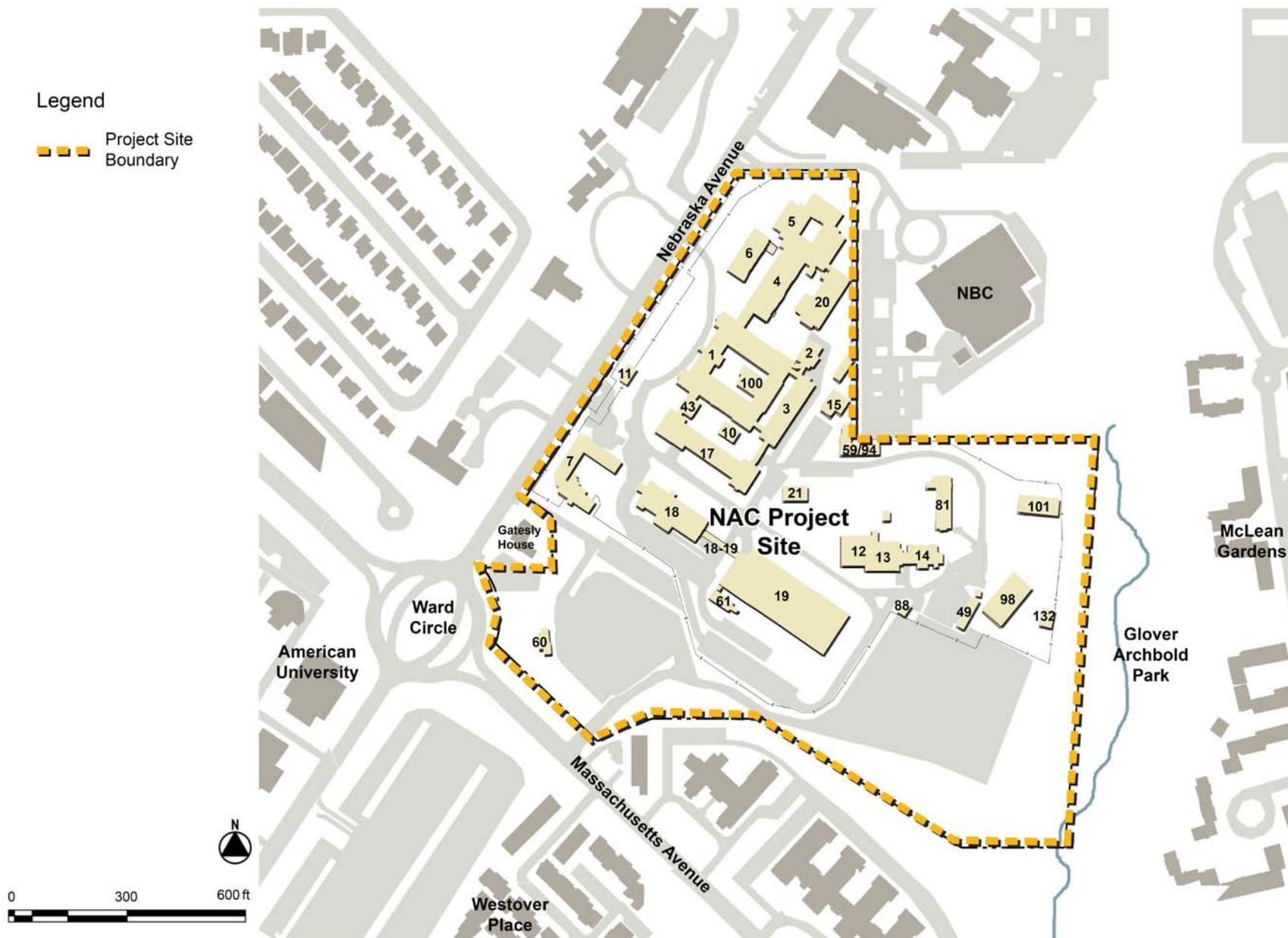


Figure 1-2 Location of the Nebraska Avenue Complex



The NAC site is owned by the U.S. government and managed by GSA. DHS is a tenant. Glover-Archbold Park is controlled by the National Park Service (NPS).

1.6 WHICH FEDERAL AGENCY IS LEADING THIS PROJECT?

GSA is a federal agency that supports the basic functions of the U.S. government and is the development manager for federal facilities. In this role, GSA acts as the landlord for federal facilities and maintains the upkeep of facilities under its purview, including facility renovation when needed. GSA is also responsible for the construction of new facilities.

Public Law (PL) 108-268, which was enacted on July 2, 2004, required the Secretary of the Navy to transfer custody and control of the NAC to GSA for the purpose of accommodating DHS. Therefore, for the NAC Master Plan, GSA is the lead agency under NEPA. GSA is developing the NAC Master Plan in order to determine how best to accommodate additional employees on site through the construction of new buildings and renovation of existing buildings.

1.7 WHO ARE THE COOPERATING AGENCIES?

GSA is developing this EIS in cooperation with DHS and the National Capital Planning Commission (NCPC). According to the Council on Environmental Quality (CEQ) regulations implementing NEPA, a cooperating agency is an agency that has relevant jurisdiction or expertise with respect to any environmental impact involved in a project (40 CFR 1508.5). DHS currently occupies the NAC site and would continue to occupy the NAC after completion of the Master Plan; DHS is a tenant of GSA. NCPC is a federal agency that has regulatory authority over federal development and develops long-range planning efforts within the District of Columbia.

"Cooperating agency" means any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment. A State or local agency of similar qualifications or, when the effects are on a reservation, an Indian Tribe, may by agreement with the lead agency become a cooperating agency. (40 CFR Part 1508.5)

1.8 WHAT IS THE BACKGROUND AND HISTORY OF THE PROJECT?

The NAC site was originally developed as the Mount Vernon Seminary for Girls in the early part of the twentieth century when this part of the District of Columbia was largely rural in nature. The main school building, which is attributed to architect Wesley Sherwood Bessell, was built in 1916 in the Georgian Revival style and set the tone for much of the later development on the campus. Today this building is the primary public face of the complex. Bessell went on to design several additional buildings on the Mount Vernon Seminary's academic campus.

The U.S. Navy took ownership of this property in 1943 for the U.S. Naval Cryptanalysis operations during World War II. The first four major buildings built for the U. S. Navy were also designed by Bessell, utilizing the same design vocabulary and respecting the same campus grid established by the Mount Vernon Seminary for Girls. In 2004, the NAC was transferred to GSA for use by DHS. DHS has occupied the site and has proposed plans to maintain occupancy of the NAC as part of its long-term strategic housing plan.

1.9 WHAT IS THE PURPOSE OF AND NEED FOR THE NEBRASKA AVENUE COMPLEX MASTER PLAN?

The purpose of the proposed action is to develop a Master Plan for the NAC as a campus capable of being maintained at the appropriate security level to house DHS. It is intended that the Master Plan would guide future renovation and development of a cohesive campus by establishing design and land-use planning principles for the construction of new buildings, roadways, open green space, utility systems, and other infrastructure needs, while minimizing environmental, economic, and social impacts. The Master Plan's design and planning principles encourage the preservation and rehabilitation of the NAC's historic landscape and buildings.

The NAC Master Plan is needed to support the goals of the DHS National Capital Region Housing Master Plan which proposes to consolidate 28,000 DHS employees currently housed in more than 40 locations into approximately 7 to 10 locations. The extreme dispersion of DHS components imposes significant inefficiencies in daily operations which can be magnified at the most critical moments when the department must act as an integrated team responding to significant natural disasters or terrorist threats. In order to fulfill DHS' significant space needs, GSA continues to explore various locations for DHS facilities throughout the National Capital Region. In December 2008, GSA issued a Record of Decision for the DHS Consolidated Headquarters at St. Elizabeths West Campus in Washington, DC and an EIS is underway for the remaining DHS Headquarters Consolidation requirement at the St. Elizabeths East Campus. The St. Elizabeths facilities would accommodate 14,000 of the 28,000 DHS employees in the NCR. The NAC is identified in the DHS NCR Housing Master Plan as a facility not suitable for the permanent DHS headquarters given its physical limitations, however, the NAC can be a viable site for certain DHS components.

In order to strengthen DHS operational management capabilities, the DHS NCR Housing Master Plan suggests that DHS employees continue to be housed at the NAC – one of the few locations in Washington, DC that can achieve the Interagency Security Committee (ISC) requirements for an ISC Level V secure campus. DHS' NCR-wide consolidation efforts could result in new or additional components to be housed at the NAC; therefore, a Master Plan is needed to guide any anticipated new facility, security, or infrastructure requirements.

Further, a NAC Master Plan is needed to serve as a guide that will provide for functional flexibility in serving programmatic changes related to the evolving mission of DHS. The NAC Master Plan would steer long range campus construction, renovation, and maintenance to serve DHS mission needs. There is a need for a

comprehensive plan to guide federal investment to maintain, improve or construct new campus facilities, security, and infrastructure.

1.10 HOW HAVE THE PUBLIC AND STAKEHOLDER AGENCIES BEEN INVOLVED?

Public involvement is a critical part in the NEPA process. By involving citizens, stakeholder groups, and local, state, and federal agencies, the Federal Government can make better informed decisions. Through the NEPA process, the public has had, and will continue to have, opportunities to comment on the NAC Master Plan and this EIS.

“Scoping” is a tool for identifying the range, or scope, of issues that should be addressed in the EIS; scoping provides the public with the opportunity to help define priorities and express concerns regarding the agency’s proposed action. GSA and DHS initiated the public scoping process on November 3, 2009 through publication in the *Federal Register* of a Notice of Intent (NOI) to prepare an EIS. The NOI announced GSA’s plans to prepare an EIS for the proposed Master Plan to guide future development of a campus for DHS at the NAC. It also announced GSA’s related consultation with the District of Columbia State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (ACHP) under Sections 106 and 110 of the National Historic Preservation Act (16 U.S.C. 470(f) and 470(h-2)). Letters announcing the scoping comment period and the public meeting were sent to agencies, organizations, and individuals. The comment period was open from November 3, 2009 through December 4, 2009 and comments received during this period of time were taken into consideration in the development of this Draft EIS.

During the 30-day scoping period, a public meeting was held on Tuesday, November 17, 2009 from 7 p.m. until 9 p.m. at Horace Mann Elementary School, located at 4430 Newark Street, NW, Washington, D.C. 20016. Community members were notified of the public meeting via the publication of newspaper advertisements, the

distribution of flyers, and the mailing of letters. The meeting followed an informal open house format; attendees were able to visit nine topic area stations, each displaying up to five boards. Topics presented on the boards included:

1. Purpose/Need and Section 106/NEPA Process,
2. Site Overview,
3. Visual Resources/Community Assessment,
4. Historic and Cultural Resources,
5. Natural Features,
6. Land Use/Zoning,
7. Transportation,
8. Utilities and Stormwater, and
9. Preliminary Development Concept.

GSA, DHS and the consultant team representatives assisted attendees by answering questions and recording comments.

Additional consultation/coordination meetings were held with stakeholder agencies in order to help define the scope of the EIS and to solicit input during the alternatives development process. A meeting with representatives from NCPC, the District of Columbia Office of Planning (DCOP), the District Department of Transportation (DDOT) and SHPO was held on November 20, 2009. The meeting was held in order to discuss these agencies' preliminary concerns regarding the proposed Master Plan project.

Another stakeholder coordination meeting was held on December 16, 2009 at the U.S. Commission of Fine Arts (CFA) for stakeholders unable to attend the November 20, 2009 meeting. Attendees included CFA and the SHPO.

In addition to providing verbal input at the stakeholder agency meetings, NCPC, DCOP, SHPO and District of Columbia Water and Sewer Authority (D.C. Water) provided written comments.

Table 1-2 Comment Respondents during the Scoping Period

Organization	Comment Method	Number of Respondents
DCOP	Written	1
	Verbal	1
DC WASA	Written	1
Embassy of Sweden	Written	1
	Verbal	1
NCPC	Written	1
	Verbal	1
DDOT	Verbal	2
Greenbriar Condominium	Written	2
DC SHPO	Verbal	2
CFA	Verbal	2
Westover Place	Verbal	6
American University	Verbal	2
DC FEMS	Verbal	1
Individuals (no organization listed)	Verbal	2

As shown in Table 1-2, representatives from eleven organizations/agencies and two individuals commented during the scoping period. The issues raised during scoping are discussed in Section 1.11.

During the development of the Master Plan alternatives and the Transportation Management Plan in the spring and summer of 2010, additional meetings were also held with the National Park Service (NPS), American University (AU), DDOT, the Advisory Neighborhood Commission (ANC-3E01, 3E02, and 3E05), NCPC, CFA, and the SHPO.

1.11 WHAT ISSUES WERE RAISED DURING THE SCOPING PROCESS?

The following is a summary of the major issues that were identified through written comments, the public scoping meeting, and agency consultation and coordination meetings. These issues are organized by topic area and listed below.

Visual Resources

Public comments suggested that GSA/DHS should take into account views to/from local landmarks or sites such as the National Cathedral and Ward Circle.

Historic and Cultural Resources

Public comments suggested that GSA/DHS should ensure historic buildings as well as historic landscapes are respected and taken into account while developing potential campus concepts and analyzing the potential impacts in the Draft EIS.

Natural Resources

Public comments suggested that GSA/DHS should consider going above and beyond LEED Silver for sustainability certification for the project design and should address the potential impacts to air quality, hydrology, noise, water quality, vegetation/tree canopy, and wetlands in the analysis of the Draft EIS.

Land Use and Planning Policies

Public comments suggested that GSA/DHS should evaluate the NAC's context and potential impacts on adjacent neighborhoods, its incorporation of green space within the campus property, its edge treatment of the property (particularly on the border of Ward Circle), and its consistency with D.C. planning policies and goals. The NAC should also coordinate its Master Plan development with the development of the AU Master Plan, currently underway.

Transportation and Parking

Public comments suggested that GSA/DHS should commission a traffic study, consider a range of alternative transportation options to access the site, evaluate shared parking arrangements with nearby entities (such as AU), and consider pedestrian and vehicle safety improvements while developing potential campus concepts and analyzing the potential impacts in the Draft EIS.

Utilities

Public comments suggested that GSA/DHS should evaluate utilities infrastructure present on the site, their adequacy (particularly as it relates to water lines and fire suppression pressure), and their level of maintenance accessibility due to security measures, and take them into account when developing potential campus concepts and analyzing the potential impacts in the Draft EIS.

Stormwater

Public comments suggested that GSA/DHS should investigate ways to reduce stormwater runoff through the reduction of impervious surfaces and consideration of other techniques when developing potential campus concepts and analyzing the potential impacts in the Draft EIS.

Security

Public comments suggested that GSA/DHS should design campus security measures to be integrated with the potential campus concept plans in a way that beautifies the public realm, does not impede sidewalk use and does not impact the health of existing trees.

Noise

Public comments suggested that GSA/DHS should restrict noisy equipment in the early morning and Sundays and evaluate the potential impacts of noise from ongoing operations at the NAC in the Draft EIS.

Environmental Health

Public comments suggested that GSA/DHS should investigate the possibility of contaminated fill and evaluate the potential impacts of its presence on site in the Draft EIS.

1.12 WHAT RESOURCE ISSUES HAVE BEEN CONSIDERED IN THIS DOCUMENT?

The issues raised by stakeholders were taken into consideration in the development of the Draft EIS and the Master Plan. Based on a thorough review of the suggestions made during internal, agency and public meetings, the topics listed below are included in this Draft EIS:

- Section 3.3 Land Use
- Section 3.4 Plans and Policies
- Section 3.5 Community Facilities
- Section 3.6 Visual Resources

- Section 3.7 Cultural and Historic Resources
- Section 3.8 Archaeological Resources
- Section 3.9 Geologic Resources
- Section 3.10 Soil Resources
- Section 3.11 Topographic Conditions
- Section 3.12 Water Resources and Water Quality
- Section 3.13 Stormwater Management
- Section 3.14 Vegetation
- Section 3.15 Hazardous Materials, Waste, and Contamination
- Section 3.16 Transportation
- Section 3.17 Infrastructure/Utilities
- Section 3.18 Air Quality
- Section 3.19 Noise Assessment
- Section 3.20 Climate Change and Sustainability

A number of issues were considered for evaluation at the outset of the Draft EIS process but were eliminated from detailed study within this Draft EIS based on the fact that impacts would be non-existent or negligible in intensity or that the resource is not present within the study area or area of impact. The issues include economic/fiscal resources, floodplains, threatened and endangered species, wildlife, and demographics and environmental justice. The rationale for their exclusion is outlined in Section 3.2.