

# **ES EXECUTIVE SUMMARY**

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The Draft Environmental Impact Statement (EIS) has been prepared pursuant to:

- The National Environmental Policy Act of 1969 (NEPA);
- Council on Environmental Quality (CEQ) regulations to implement NEPA contained in 40 Code of Federal Regulations (CFR) Parts 1500 to 1508;
- GSA Order ADM 1095.1F (Environmental Considerations in Decision-making), dated October 19, 1999; and
- PBS (Public Buildings Service) National Environmental Policy Act – NEPA Desk guide (GSA, October 1999).

NEPA requires all federal agencies to provide a detailed EIS for every major federal action, planned and proposed, that may significantly affect the quality of the human environment. The EIS should include information on:

- the environmental impact of the Proposed Action;
- any adverse environmental effects that cannot be avoided should the proposal be implemented;
- alternatives to the Proposed Action;
- the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity; and
- any irreversible and irretrievable commitments of resources that would be involved in the Proposed Action should it be implemented.

NEPA also requires consultations with federal agencies that have jurisdiction or special expertise with respect to environmental impacts.

**ES.1 Proposed Action**

The proposed action is the development and implementation of a Master Plan for the Nebraska Avenue Complex (NAC) as a campus capable of being maintained at the appropriate security level to house the current tenant, the U.S. Department of Homeland Security (DHS), and for future DHS consolidation at the site. It is intended that the Plan will 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 proposed action supports the goals of the DHS National Capital Region (NCR) Housing Master Plan which propose to consolidate over 28,000 DHS employees currently housed in over 40 locations into 7 to 10 locations—the NAC site being one of the primary sites identified for certain DHS components. Over the past six years, various DHS components have been relocated to the NAC site, placing strain on the nearly 100-year old installation. A comprehensive plan to guide federal investment is needed in order to maintain, improve, and/or construct new campus facilities, security, and infrastructure.

**ES.2 Location**

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.

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).

### ES.3 Alternatives

This document evaluates three action alternatives and the No Action Alternative:

- *No Action* – the “No Action” alternative would result in the NAC project site continuing to operate in the existing facilities following current management protocol. However, DHS would continue to seek a permanent location for additional employees not currently accommodated at the NAC. The total amount of floor space contained within the buildings on campus is approximately 653,400 GSF, which accommodates a total of 2,390 seats, and there are 1,239 parking spaces.
- *Alternative A: Low Density Development* – Existing buildings and new construction would equate to approximately 1.1 million GSF of space for DHS and a total of 3,700 seats at the location (1,780 existing seats after demolition plus 1,920 new seats). The new construction would come in the form of both new buildings and an architectural parking structure. Many of the new buildings would have green roofs. The existing building mass on campus would be concentrated along the north half of Nebraska Avenue set back from the road, and new massing would be added to the northeast and east portions of the site. The location and appearance of the parking structure would create a visible building mass along Ward Circle, giving the campus an observable presence from this corner. There would be three entrances to the site: two from Nebraska Avenue and one from Massachusetts Avenue. This alternative would feature 1,025 parking spaces; 925 within the parking garage outside the secure perimeter and 100 spaces inside the secure perimeter. The landscape concept would be comprised of core design elements present in all alternatives, including reestablished historic courtyards, preservation of existing trees on-site, primary pedestrian

**Seats:** seats are used as a unit of density throughout this document. Seats are not equivalent to the total number of employees but rather represent the maximum number of people who may be physically working at the NAC project site at any point in time. The total number of employees may be higher as some employees may choose to telework or participate in another flexible work program that does not require them to be physically present on-site.

access ways with ramps for Americans with Disabilities Act (ADA) accessibility, and redesigned internal campus walkways with bioswales and urban design features. At the southwest corner of the site, a signature landscape would surround the parking garage, complementing the design of the new structure.

- *Alternative B: Mid-Density Development* – Existing buildings and new construction would equate to approximately 1.2 million GSF of space for DHS and a total of 4,200 seats at the location (1,780 existing seats after demolition plus 2,420 new seats). The new construction would come in the form of new buildings and a parking structure. Many of the new buildings would have green roofs. The location of a building on Ward Circle is one of the main differentiating features between this alternative and the others. There would be two entrances onto the site; one from Nebraska Avenue and one from Massachusetts Avenue. There would also be an exit-only driveway on Nebraska Avenue directly north of the Gatesly house. This alternative would feature 1,150 parking spaces with 1,050 outside the secure perimeter and 100 spaces inside the secure perimeter. The landscape concept for Alternative B would be composed of core design elements consistent across all alternatives, including reestablished historic courtyards, preservation of existing trees on-site, primary pedestrian access ways with ramps for ADA accessibility, and redesigned internal campus walkways with bioswales and urban design features. At the southwest corner of the site, a signature landscape would complement the design of the new building near Ward Circle. This alternative also allows for significant open space between Buildings A and B and across from Buildings 12, 13, and 14. Historically, this area has contained terraced sport courts.

- *Alternative C: High Density Development* – Existing and new construction would equate to approximately 1.3 million GSF of space for DHS and a total of 4,500 seats at the location (1,780 existing seats after demolition plus 2,720 new seats). The new construction would come in the form of new buildings and a parking structure. The parking garage would be located at the southwest corner of the site (adjacent to Ward Circle) and would feature a green roof. There would be three entrances onto the site: two from Nebraska Ave and one from Massachusetts Ave. This alternative would feature 1,225 parking spaces with 1,125 outside the secure perimeter and 100 spaces inside the secure perimeter. The landscape would be composed of core design elements consistent across all alternatives, including reestablished historic courtyards, preservation of existing trees on-site, primary pedestrian access ways with ramps for ADA accessibility, and redesigned internal campus walkways with bioswales and urban design features. At the southwest corner of the site, a parking structure with a green roof would be located at Ward Circle and the parking lot would be recessed into the ground so that the vegetated roof, but not the building, is visible from Ward Circle. This would minimize the urban presence of the campus from this corner.

**ES.4 Impacts**

Potential direct, indirect, short-term, long-term and cumulative impacts associated with each alternative under consideration were studied in relation to a variety of resource topics. The conclusions of this analysis are summarized below by resource topic.

**Land Use**

- No Action Alternative: No direct or indirect impacts would occur within the site or study area.
- Alternatives A, B and C: No adverse direct or indirect impacts would occur within the study area. Beneficial, long-term impacts on land use within the NAC would result due to the consolidation of parking, increased landscape coverage, and the introduction of low impact development practices such as green roofs on buildings.

**Plans and Policies**

- No Action Alternative: No impacts to the policies and plans to which it currently conforms. This alternative would not conform with several initiatives in the Federal Elements of the Comprehensive Plan for the National Capital and the DC Green Agenda.
- Alternatives A, B and C: The alternatives would have no short-term or long-term adverse impacts on plans and policies.

**Community Facilities**

- No Action Alternative: No direct or indirect impacts would occur.
- Alternatives A, B and C: Long-term, negligible indirect impacts on community facilities and services would be generated by the demand from additional people at the NAC site.

**Visual Resources**

- No Action Alternative: Impacts would be negligible.
- Alternatives A, B and C: Beneficial impacts to views along Nebraska Avenue, NW, at Ward Circle, and along Massachusetts Avenue, NW would occur. There would be minor adverse impact on views from Glover-Archbold Park.

**Cultural and Historic Resources**

- No Action Alternative: There would be long-term minor to moderate adverse impacts to potential historic properties and cultural resources.
- Alternative A: Long-term direct adverse impacts to historic resources would be moderate due to the removal of one contributing building, with beneficial impacts from the preservation and rehabilitation of some contributing landscape features. Short and long-term impacts to historic resources within the secondary Area of Potential Effects (APE) are anticipated to be minor.
- Alternative B: Long-term direct adverse impacts to historic resources would be moderate due to the removal of one contributing building, with beneficial impacts from maintaining building and spatial relationships and from the preservation and rehabilitation of some contributing landscape features. Beneficial impacts would also occur from maintaining the historic openness of the athletic/recreational historic area under this alternative. Short and

long-term impacts to historic resources within the secondary APE are anticipated to be minor.

- Alternative C: Long-term direct adverse impacts to historic resources would be moderate due to the removal of one contributing building, with beneficial impacts from the preservation and rehabilitation of some contributing landscape features. Short and long-term impacts to historic resources within the secondary APE are anticipated to be minor.

### **Archaeological Resources**

- No Action Alternative: Impacts would be negligible.
- Alternatives A, B and C: There is the potential for long-term minor adverse impacts to archaeological resources.

### **Geologic Resources**

- No Action Alternative: No direct or indirect impacts would occur.
- Alternatives A, B and C: Long-term minor adverse impacts to geologic resources would occur.

### **Soil Resources**

- No Action Alternative: No direct or indirect impacts would occur.
- Alternative A: Minor, adverse, direct, site-specific, short-term and long-term impacts on soils would occur. Beneficial impacts to soils could occur due to a decrease in impervious surfaces and additional vegetative cover.
- Alternatives B and C: Minor to moderate, adverse, direct, site-specific, short-term impacts and minor, adverse, direct, long-term site-specific impacts would occur. Beneficial impacts to soils could occur due to a decrease in impervious surfaces and additional vegetative cover.

**Topographic Conditions**

- No Action Alternative: No direct or indirect impacts would occur.
- Alternatives A, B and C: Minor to moderate, adverse, direct, site specific impacts on topography would occur.

**Water Resources and Water Quality**

- No Action Alternative: Long-term minor to moderate adverse impacts to water resources and water quality would occur due to the lack of stormwater management practices.
- Alternatives A and C: Short-term moderate adverse construction-related impacts to surface water and groundwater would occur, as well as short-term minor indirect adverse impact on wetlands in the vicinity of the NAC site due to soil erosion. Long-term, direct minor to moderate adverse impacts to water resources and long-term direct beneficial impacts to streams, groundwater, and wetlands could occur due to improved stormwater management on-site.
- Alternative B: Short-term moderate adverse construction-related impacts to surface water and groundwater would occur, as well as short-term minor indirect adverse impact on wetlands in the vicinity of the NAC site due to soil erosion. Long-term, direct minor adverse impacts to water resources and long-term direct beneficial impacts to streams, groundwater, and wetlands could occur due to improved stormwater management on-site.

**Stormwater Management**

- No Action Alternative: Long-term minor to moderate adverse impacts to water resources and water quality both locally and regionally would occur due to the lack of stormwater management.
- Alternatives A, B and C: Long-term, beneficial impacts on stormwater quality and quantity control on the site and within the local area and region would occur. Impervious surface cover would be reduced under each alternative through the introduction of additional open space and landscaping, the consolidation of surface parking into a parking structure, the installation of green roofs, and the use of pervious materials for pathways.

**Vegetation**

- No Action Alternative: Impacts would be negligible to minor due to the removal of one heritage tree.
- Alternatives A and C: Minor, short-term adverse impacts to vegetation would occur. Minor, long-term adverse impacts to vegetation would occur due to the removal of one heritage tree. The reestablishment of historic landscape features and at least a 10% increase in the tree canopy would also result in long-term, beneficial impacts.
- Alternative B: Minor, short-term adverse impacts to vegetation would occur. As no heritage trees would be removed, long-term adverse impacts to vegetation would be negligible to minor. The reestablishment of historic landscape features and at least a 10% increase in the tree canopy would also result in long-term, beneficial impacts.

**Hazardous Materials, Waste, and Contamination Conditions**

- No Action Alternative: Impacts would be negligible.
- Alternatives A, B and C: Impacts to site contamination conditions would be negligible. Impacts due to the closure or removal of Underground Storage Tanks (UST) and Above-ground Storage Tanks (AST) would be short-term, negligible, and direct with potential long-term, indirect, beneficial impacts resulting from fewer older storage tanks in use on the site. In regard to hazardous material, short-term impacts from construction activities would be adverse, minor, and direct and long-term adverse impacts would be negligible.

## Transportation

- No Action Alternative: Short- and long-term impacts on study intersections, NAC driveways, and on queues along public streets would be negligible. No impacts would occur on public transportation and parking. Impacts to pedestrian and bicycle conditions would be negligible.
- Alternatives A and B: Short- and long-term impacts on study intersections and on queues along public streets would be negligible. There would also be negligible short-term and negligible to minor long-term impacts on intersection capacity at NAC driveways; long-term beneficial impacts on public transportation; short-term, moderate adverse impacts to parking on the site due to construction; and long-term, negligible, adverse impacts on parking outside the NAC site. Impacts to bicycle and pedestrian circulation would be minor and adverse due to construction activities in the short-term and beneficial impact in the long-term.
- Alternative C: Long-term, minor adverse impact on the intersection of Ward Circle and Massachusetts Avenue (West) during the AM and PM peak hours would occur. Short- and long-term impacts to all other study intersections would be negligible. Impacts on queues along public streets would be negligible, and impacts to intersection capacity at NAC driveways would be negligible in the short-term and negligible to minor in the long-term. Short-term moderate adverse impacts due to construction would occur to parking on the site, and there would be long-term, negligible, adverse impacts on parking outside the NAC site. Short-term minor adverse impacts would occur to bicycle and pedestrian circulation due to construction. There would be long-term, beneficial impacts to public transportation and pedestrian and bicycle conditions.

### **Infrastructure and Utilities**

- No Action Alternative: No impacts on the chilled water system, High Temperature Hot Water (HTHW) system, electrical system, water service and fire protection system, wastewater system, or natural gas system would occur.
- Alternatives A, B and C: Minor, short-term, adverse, impacts would occur during the construction and demolition of facilities while systems are re-sited. Beneficial, long-term impacts to chilled water system, HTHW system, electrical system, water service and fire protection system, and natural gas system during operation of the facility. Negligible long-term adverse impacts to wastewater system.

### **Air Quality**

- No Action Alternative: Impacts would be negligible.
- Alternatives A, B and C: Minor adverse short-term impacts on air quality would occur. There would also be a minor long-term impact on local and regional air quality. No alternative would not cause or contribute to an exceedance of any National Ambient Air Quality Standards (NAAQS) or interfere with the attainment or maintenance of any NAAQS.

### **Noise**

- No Action Alternative: Impacts would be negligible.
- Alternatives A, B and C: Moderate, short-term, adverse impacts would occur during the site preparation and construction phases. During the site's operation, there would be negligible, adverse long-term impacts to noise levels.

**Climate Change and Sustainability**

- No Action Alternative: Adverse impacts on climate change and site sustainability would occur due to inefficient buildings and lack of stormwater management techniques.
- Alternatives A, B and C: Minor adverse impact on global climate change would occur in the short-term due to construction activities and in the long-term due to greenhouse gas emissions. Long-term, beneficial impacts to sustainability would also occur through increased employment of sustainable practices and techniques.