

**MASTER PLAN AMENDMENT 2 FOR THE  
DEPARTMENT OF HOMELAND SECURITY HEADQUARTERS CONSOLIDATION**

General Services Administration  
St. Elizabeths West Campus  
Washington, DC

October 1, 2020

Record of Decision

**Statement of Decision**

In consultation with the Commission, as Chairman of the National Capital Planning Commission (NCPC or Commission) it is my decision to approve this Record of Decision (ROD) and thereby implement the Preferred Alternative – Alternative B as presented and analyzed in the Draft and Final Master Plan Amendment 2 EISs. This action is necessary as part of the redevelopment of the St. Elizabeths West Campus associated with the DHS Headquarters consolidation. This ROD allows implementation of all development outlined in the 2020 Master Plan Amendment 2 to proceed subject to Commission review of individual projects. A copy of the FEIS is included in Appendix A of this ROD.

The Preferred Alternative includes development on St. Elizabeths West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, to support the DHS Headquarters consolidation as described in this ROD. GSA will continue to support DHS in reducing its numerous and disparate leases across the NCR to consolidate all DHS activities on the St. Elizabeths West Campus.

All practicable means of avoiding or minimizing environmental harm and harm to historic resources from the Preferred Alternative will be adopted by GSA, and NCPC shall consult with GSA periodically during implementation of specific projects to ensure compliance.

**Project Background**

In 2004, the General Services Administration (GSA) obtained control of the St. Elizabeths West Campus in Southeast, Washington, DC, in anticipation of meeting a portion of the need for secure Federal office space in the National Capital Region (NCR). On June 7, 2005, in compliance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's (CEQ) implementing regulations, GSA published a Notice of Intent (NOI) to prepare an EIS for the proposed redevelopment of the St. Elizabeths West Campus. On June 28, 2007, GSA published a revised NOI. The NOIs defined the purpose of the proposed action as “developing secure office space in the District of Columbia to accommodate substantial Federal operations,” specifically the Consolidated Headquarters of the Department of Homeland Security (DHS) and its components,

in accordance with the 2006 *DHS National Capital Region Housing Plan* and the 2007 *Consolidated Headquarters Collocation Plan*.

GSA issued a ROD for the 2008 Final Master Plan EIS on December 16, 2008, selecting the alternative that consolidated 4.5 million gross square feet of secure office and shared-use space and associated parking on both the West and East Campuses at St. Elizabeths. As part of the 2008 Final Master Plan EIS for this action, GSA also assessed, on a programmatic level, the impacts of constructing 750,000 gross square feet of office space and associated parking on the St. Elizabeths East Campus. GSA noted in its ROD that an EIS tiered to the 2008 Final Master Plan EIS would be prepared for the East Campus.

On September 15, 2009, GSA published an NOI to prepare an EIS to address the amended 2008 *Department of Homeland Security Headquarters Consolidation Master Plan*. The NOI stated the primary purpose of the action was “to complete the consolidation of DHS mission functions comprising the Department’s Headquarters offices at St. Elizabeths for a total of 4.5 million gross square feet of secure office and shared-use space plus associated parking” on the East Campus. The 2012 Final Master Plan Amendment EIS was made public on March 2, 2012, and GSA issued a ROD for the 2012 EIS on May 17, 2012. The 2012 Final Master Plan Amendment EIS was tiered from the 2008 Final Master Plan EIS.

On November 19, 2018, GSA published an NOI to prepare an EIS for St. Elizabeths Master Plan Amendment 2, which eliminates development on the East Campus and re-evaluates development on the St. Elizabeths West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, for the DHS Headquarters consolidation. The Master Plan Amendment 2 Final EIS was issued for a 30-day public review on August 28, 2020.

### **National Capital Planning Commission Review**

Pursuant to 40 U.S.C. 8722(b)(1), NCPC reviews and comments on master plans for federal properties with more than one building on the property/installation. The final master plan serves as a basis for subsequent review and approval of individual projects envisioned in the master plan for District installations pursuant to 40 U.S.C. 8722(b)(1) and (d). NCPC’s review and approval of individual projects under the master plan constitutes a major federal action significantly affecting the quality of the human environment. This means NCPC must comply with NEPA, CEQ Regulations Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508) (1978 version); and NCPC’s NEPA regulations (1 CFR § 601). Pursuant to NCPC’s NEPA Regulations, applicants, with NCPC’s participation as a cooperating agency, typically undertake their NEPA obligation at the time of their master plan development and submit their NEPA documentation to NCPC for the Commission’s review and approval as part of the master plan application. NCPC’s approval of the EIS and issuance of a ROD at the time of master plan review renders it possible for applicants to utilize the NEPA document to meet their NEPA obligation for specific projects included in the master plan and submitted to the Commission for review and approval at a later date.

NCPC approved the initial Master Plan for the consolidation of DHS Headquarters on the West and East Campuses on January 8, 2009. It approved the Master Plan Amendment 1 on June 7,

2012. The draft Master Plan Amendment 2 was reviewed by NCPC on July 9, 2020, and the Final Master Plan Amendment 2 was approved at the Commission's October meeting. At the time of its review, the Commission approved and adopted this ROD

### **Purpose and Need of the Proposed Action**

The purpose for this proposed action is to support the continued consolidation of the DHS Headquarters offices on the St. Elizabeths West Campus. The proposed Master Plan Amendment 2 eliminates development on the East Campus and re-evaluates development on the West Campus to accommodate 4.1 million gross square feet of secure office and shared-use space, and 1.6 million gross square feet of associated parking, on the West Campus only. The proposed action is needed for efficiency, to reflect the current condition of the historic buildings, to reduce costs, and to accelerate completion of the DHS consolidation.

### **Rationale for Decision**

This ROD documents the specific components of and reasons for NCPC's decision. This decision is based on analyses contained in the Draft Environmental Impact Statement (EIS) issued May 2020; the Final EIS issued in August 2020; the comments of NCPC, other Federal, State, and local agencies, members of the public, and other information in the administrative record. The decision to choose the Preferred Alternative -- Alternative B as the basis for NCPC's review and approval of future projects involved balancing GSA goals, resource concerns and public interests. NCPC reached its decision after careful consideration of the environmental analysis of the effects of the Action Alternatives and the No-Action Alternative in concert with the needs of GSA and DHS.

The Preferred Alternative -- Alternative B best meets the purpose and need, while balancing potential impacts. The alternative balances the likely adverse impacts on the National Historic Landmark (NHL), with the pressing national security need for DHS to consolidate its headquarters at a single, secure site in the National Capital Region (NCR). This decision takes into account resource concerns and mitigation measures to address these concerns, DHS' national security mission and program, and public interests as described in the NEPA documentation.

The master plan is a guide for project implementation over the next 20-30 years. Specific designs for each project will be further assessed when they are developed in detail. Individual projects will also require review and approval by the Commission and follow-on Section 106 consultation with consulting parties.

### **Preferred Alternative Description**

Under Alternative B, 1.2 million gross square feet of office space will be provided in two separate office structures (proposed Buildings B1 and B2) organized around two enclosed courtyards on the plateau site. Building heights will be designed to reach between three and eight stories. The largest part of the structures will have an east-west orientation to optimize the use of daylight and energy efficiency. The building organization also relates well to the east to west direction of stormwater flow.

The courtyards will be secured to provide open space for building occupants. Buildings could be linked below grade at these elevation drops to facilitate internal circulation. The buildings will fit

naturally on the site minimizing the need to disturb existing topography and vegetation on the plateau site. Building B1 will be stepped down into the ravine near Building 56/57 to stabilize the slope in that area. Building 56/57 will be integrated into the design of Building B1. Buildings 52 and 64 will be retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, and 68, which total 70,277 gross square feet, will be demolished under Alternative B. Building 69, which is 27,588 gross square feet, will be evaluated by GSA to determine if it can be feasibly retained and used as Federal office space. GSA will report findings to the Section 106 consulting parties and consider their comments on the findings. Approximately eight acres of the plateau site will be disturbed as a result of demolition and construction activities under Alternative B.

Under Alternative B, 175,000 gross square feet of office space will be constructed on the Sweetgum Lane site (proposed Building C1) in the same manner as Alternative A (described below). Building 15, which totals 2,749 gross square feet, will be demolished under Alternative B. Approximately 1.5 acres of the Sweetgum Lane site will be disturbed as a result of demolition and construction activities under Alternative B.

Under Alternative B, an additional 1,014 employee parking spaces will be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces will be added to the previously proposed underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

Detailed building and site design of the plateau and Sweetgum Lane sites will define the following improvements:

- Sidewalk locations and walkways between buildings
- Alterations to the ravine including enhanced pedestrian connections and landscaping
- Engineering for stabilization of steep slopes including building foundations
- Realignment of site drainages and landscaping in response to building design
- Shuttle bus drop-off locations
- Shipping/receiving areas for buildings
- Electric power, communications, and utility corridors designed for buildings and site improvements
- Stormwater management controls
- Remediation of contaminated soils

Alternative B was chosen as the Selected Alternative because it best meets the purpose and need, while best balancing the likely adverse impacts on the National Historic Landmark (NHL), with the pressing national security need for DHS to consolidate its headquarters at a single secure site in the NCR.

## Other Alternatives Considered

### *No Action Alternative*

Under the No Action Alternative, GSA would develop the St. Elizabeths West Campus as described in the Master Plan as approved by the National Capital Planning Commission (NCPC) on January 8, 2009. The development would provide 1,141,133 gross square feet of office and related space on the plateau site, with no development on the Sweetgum Lane site, resulting in a total of 3.8 million gross square feet of office and related space on the West Campus. This development would disturb approximately 6 acres on the plateau site. Parking would be provided at a ratio of one parking space for every four employees (1:4). On the West Campus, 1.2 million gross square feet of parking would be constructed above and below grade. No buildings would be demolished within the plateau or Sweetgum Lane sites under the No Action Alternative.

Master Plan Amendment 1, which was approved by NCPC in June 2012, included the development of office space and parking on the North Parcel of the East Campus. The East Campus is under the control of the District of Columbia; therefore, the construction of DHS facilities on the East Campus is not feasible and was not included under the No Action Alternative.

### *Alternative A*

Under Alternative A, 1.2 million gross square feet of office space would be organized into three separate office structures (proposed Buildings A1, A2, and A3) organized around two open courtyards on the plateau site, resulting in a campus setting that correlates to the organization of the historic buildings on the St. Elizabeths West Campus. Building heights would likely be designed to reach between three and eight stories. The largest part of the structures would generally have an east-west orientation, which would be ideal for optimizing the use of daylight and energy efficiency. The building organization also relates well to the east to west direction of stormwater flow. The central open courtyards would be tiered from east to west, in conjunction with site topography. Buildings could be linked below grade at these elevation drops to facilitate internal circulation, fit naturally on the site, and minimize the need to disturb existing topography and vegetation. Building A1 would be stepped down into the ravine near the Building 56/57 to stabilize the slope in that area. Building 56/57 would be integrated into the design of Building A1. Buildings 52 and 64 would be retained, rehabilitated, and adaptively reused. Buildings 60, 66, 67, 68, and 69, which total 97,865 gross square feet, would be demolished under Alternative A. Approximately 7 acres of the plateau site would be disturbed as a result of demolition and construction activities under Alternative A.

Under Alternative A, 175,000 gross square feet of office space (proposed Building C1) would be constructed on the Sweetgum Lane site, organized into primarily below-grade construction, with one two-story building constructed to mirror the northwest corner of the Munro Building. The building would include up to three below-grade levels, which would take advantage of the site slope from east to west, allowing the western edge of the building to receive daylight. A central courtyard would provide internal daylighting; the building could be linked below grade to the DHS Operations Centers. Building 15, which totals 2,749 gross square feet, would be demolished under Alternative A. Approximately 1.5 acres of the Sweetgum Lane site would be disturbed as a result of demolition and construction activities under Alternative A.

Under Alternative A, an additional 1,014 employee parking spaces would be provided on the West Campus resulting in a 1:4 parking ratio. The new spaces would be added to the previously proposed underground parking garages at Gate 1 and at Gate 2 on the east side of the West Campus.

Detailed building and site design of the plateau and Sweetgum Lane sites would define the following improvements:

- Sidewalk locations and walkways between buildings
- Alterations to the ravine including enhanced pedestrian connections and landscaping
- Engineering for stabilization of steep slopes including building foundations
- Realignment of site drainages and landscaping in response to building design
- Shuttle bus drop-off locations
- Shipping/receiving areas for buildings
- Electric power, communications, and utility corridors
- Stormwater management controls
- Remediation of contaminated soils

#### **Alternatives Dismissed from Further Analysis in the EIS**

During the process of defining viable alternatives, several sites on the St. Elizabeths West Campus were investigated for new development that were subsequently dismissed from further detailed analysis. Descriptions of the dismissed alternatives and the rationale for dismissal are provided in Section 2.5 of the Master Plan Amendment 2 Final EIS.

#### **Environmentally Preferred Alternative**

Section 1505.2 The CEQ Regulations requires federal agencies to " identify all alternatives considered by the agency in reaching its decision, specifying the alternative or alternatives which were considered to be environmentally preferable." The environmentally preferable alternative(s) have been outlined by resource area to reflect the balanced approach necessary when evaluating a long-term master plan. Table (1), below, identifies the resource and relevant alternative.

**Table 1. Environmentally Preferred Alternative Analysis**

Issue	No Action Alternative	Alternative A	Alternative B
Natural Resources	X		
Cultural Resources	X		
Social and Economic Resources	X	X	X
Air Quality	X	X	X
Noise	X	X	X
Transportation	X	X	X
Utilities	X	X	X
Environmental Contamination	X	X	X

As noted above, the impacts to varying resource types were balanced against the project's purpose and need, the No Action Alternative is the environmentally preferable alternative for natural and cultural resources. The No Action Alternative would result in less ground disturbance and impact fewer trees than Alternatives A and B. The No Action Alternative would also retain more historic resources than Alternatives A and B. However, under Alternative B, proposed buildings located farther from the ravine; adverse impact is lessened when compared to Alternative A. Alternatives A, B, and the No Action Alternative, are the environmentally preferable alternatives for social and economic resources, air quality, noise, transportation, utilities, and environmental contamination because impacts are similar among the alternatives.

### Public Involvement

Numerous Federal and local agencies and community groups, stakeholders, and members of the public were consulted throughout scoping, Draft EIS and Final EIS process. The intent of the consultation was to provide information on the project, solicit information on issues that could affect the outcome of the project, and seek input on alternatives and potential impacts. Further, in addition to NCPC, DHS and the District of Columbia Department of Transportation (DDOT) were designated as cooperating agencies for the preparation of the Master Plan Amendment 2 EIS, and their input has been incorporated into the documentation.

GSA published an NOI to prepare the Master Plan Amendment 2 EIS in the Federal Register on November 19, 2018. The NOI was also published on November 19, 2018, in *The Washington Post*, *The Informer*, and *The Afro-American*. From November 19, 2018, through December 19, 2018, the public was given an opportunity to participate in the scoping process for Master Plan Amendment 2. During the scoping process for Master Plan Amendment 2, a public meeting was held on November 29, 2018, on the St. Elizabeths East Campus, during which comments and concerns were officially documented. The scoping period and meeting were announced in the newspapers with the NOI and were also announced on the project website.

A Notice of Availability (NOA) for the Draft EIS was published in the Federal Register on May 8, 2020. A notification letter of the Draft EIS availability was sent to 308 potentially interested parties, including Federal, state, and local agencies having jurisdiction by law or subject matter expertise, and to any person, organization, stakeholder group, or agency that had expressed interest in reviewing the Draft EIS during the scoping process. A 55-day comment period for the Draft EIS was initially provided from May 8, 2020, to July 2, 2020. Notices of the Draft EIS availability and comment period were published on May 8, 2020, in *The Washington Post*, May 9, 2020, in *The Afro-American*, and in the May 2020 edition of *East of the River Magazine*. Availability of the Draft EIS was also announced on the project website. The public and agencies were encouraged to submit written comments on the Draft EIS by mail or email.

Due to the requirements for social distancing related to COVID-19, GSA made alternate arrangements in lieu of a traditional public hearing on the Draft EIS. On June 30, 2020, GSA notified the public and agencies by letter and/or email of the availability of a pre-recorded presentation online or by phone from July 1, 2020, through July 16, 2020. The phone line established for the project presentation included an option to record a message with comments on the Draft EIS. An amended notice was also published in the Federal Register on July 2, 2020, extending the comment period to July 16, 2020. The June 30, 2020, notification also informed the public and agencies of the comment period extension. In total, five comment letters were received during the Draft EIS public review period. All comments on the Draft EIS were considered during the preparation of the Final EIS.

A Notice of Availability (NOA) for the Final EIS was published in the Federal Register on August 28, 2020. A notification letter of the Final EIS availability was sent to 292 potentially interested parties, including Federal, state, and local agencies having jurisdiction by law or subject matter expertise, and to any person, organization, stakeholder group, or agency that had expressed interest in reviewing the Final EIS. A 30-day review period for the Final EIS was provided from August 28, 2020, to September 28, 2020. Notices of the Final EIS availability and review period were published on August 28, 2020, in *The Washington Post*, August 29, 2020, in *The Afro-American*, and in the September 2020 edition of *East of the River Magazine*. Availability of the Final EIS was also announced on the project website.

Throughout the project, GSA sought input from Federal and local agencies and stakeholders, as well as Consulting Parties, regarding the proposed action and ways to avoid or minimize adverse impacts. Since September 2005, GSA has been regularly meeting with agencies and stakeholders associated with St. Elizabeths that might be affected by the redevelopment, including the Advisory Council on Historic Preservation (ACHP), Advisory Neighborhood Commission 8C, Committee of 100 on the Federal City, Cultural Landscape Foundation, DC Preservation League, DC Office of Planning, DC State Historic Preservation Office (DCSHPO), Federal Highway Administration (FHWA), Joint Base Anacostia-Bolling, NCPC, National Association of Olmsted Parks, National Park Service, National Trust for Historic Preservation, St. Elizabeths Hospital, U.S. Commission of Fine Arts, DDOT, and DHS. In addition, GSA has sought consultation with the Delaware Nation, a federally recognized American Indian tribe.

## **Section 106 of the National Historic Preservation Act**

In compliance with the National Historic Preservation Act (NHPA), GSA sought input from Consulting Parties on the impacts to the historic resources from the Master Plan Amendment 2 and ways to avoid and minimize potential adverse effects. Previously, a Programmatic Agreement (PA) for the DHS Headquarters consolidation was executed in December 2008 between GSA, DHS, ACHP, DCSHPO, NCPC, and FHWA. Thereafter and to date, GSA has executed seven MOAs for development projects on the West Campus.

As part of the Master Plan Amendment 2, a new MOA was executed in September 2020. The MOA for Master Plan Amendment 2 is included as Appendix 2 of this ROD.

In the MOA, GSA has agreed to take the following specific actions to mitigate adverse effects associated with this Second Amendment:

- Conduct additional documentation, including digital documentation of the interiors and exteriors of Buildings 60, 66, 68, and 69 and make it available to the public through an online platform.
- Provide tags with botanical information on historic trees as defined in the Landscape Preservation Plan within 5 years of the execution of this MOA, and replace historic trees removed for construction with the same or similar species in a nearby location as feasible and subject to guidance from GSA's Regional Horticulturalist and in consultation with the DC SHPO.
- Create an online version of materials from the 2017-2018 St. Elizabeths exhibit at the National Building Museum, and add the interpretive sign program, and other educational materials and documentation, within 5 years of execution of this MOA and in consultation with the DCSHPO.

In addition, GSA will continue to follow the Section 106 Consultation Process and Procedures for Design Submissions and consult with the Signatories and Consulting Parties for each project envisioned by the Master Plan Amendment 2. The Section 106 MOA acknowledges that the projects may advance individually.

Further, GSA will evaluate Building 69 to determine if it can be feasibly retained and used as federal government office space, will report its findings to the Consulting Parties in writing, and will consider the Parties comments on the findings. Should GSA's evaluation conclude that it can be feasibly retained and used by the federal government, this MOA will remain in force, if GSA determines it necessary, a revised master plan amendment, , will be the subject of further consultation. Should GSA's evaluation conclude that Building 69 cannot be feasibly retained and used by the federal government, GSA will notify the Consulting Parties of this decision in writing.

## EIS Mitigations Measures

Potential mitigation measures were identified and recommended by GSA in the Final EIS to address the variety of short-term and long-term impacts resulting from the Selected Alternative. With respect to the Selected Alternative, mitigation measures are described below. GSA is committed to implementing these implementation measures, and NCPC shall consult with GSA periodically during implementation of specific projects to ensure compliance.

### *Cultural Resources*

- Mitigation measures are identified in the 2008 PA for the redevelopment of St. Elizabeths to address potential adverse effects on the St. Elizabeths Hospital NHL and in subsequent MOAs in compliance with Section 106 of the NHPA. Mitigation measures for cultural resources affected by Master Plan Amendment 2 are detailed in the MOA for the Master Plan Amendment 2 executed in September 2020 (Appendix B) and summarized in the preceding section of this ROD.

### *Geology, Topography, and Soils*

- Erosion and sediment controls will be employed during demolition and construction where ground-disturbing activities occur. These controls will minimize impacts to surface water from sedimentation and other pollutants by containing erodible materials within the limits of construction. GSA will employ more than one containment method, including, but not limited to, silt fencing, dewatering filter bags, diversion channels or berms, temporary stormwater basins or sediment traps, temporary inlet protection, stabilized construction entrances, and vegetation stabilization.
- Buildings will be structurally engineered to mitigate the presence of Potomac Group deposits with the potential for shrinking or swelling.
- Prior to construction, GSA will obtain all necessary permits and comply with the requirements and guidelines set forth in those permits to minimize adverse impacts. Erosion and sediment control plans will be developed in accordance with the DC Department of Energy and Environment (DOEE) requirements and will be submitted to DOEE for approval. Construction contractors will be required to implement and maintain these erosion and sediment control measures until construction is complete and vegetation has been established.
- GSA will contract with an independent environmental monitor (IEM), separate from the construction contractor, to verify that construction complies with all terms and conditions of the permits and approvals. The IEM will inspect erosion and sediment control devices to ensure they are being sufficiently maintained and are effective, in addition to other identified responsibilities. The IEM will report deficiencies to the contractor, GSA, and regulatory agencies, if required, and support efforts to resolve issues in a timely manner. GSA will hold the construction contractor responsible for maintaining compliance and for expeditiously responding to deficiencies identified by the IEM.

- When construction is complete, exposed soils will be stabilized with landscaping to minimize potential future soil erosion. Following construction, GSA will continue to monitor and maintain the efficacy of erosion and sediment control devices and stormwater management facilities.
- Slope stabilization measures, such as closely spaced drilled piers, will be utilized for construction on steep slopes to mitigate possible future slope failure. During the building design process, GSA will also consider the use of retaining walls to stabilize slopes.

#### *Groundwater*

- During the building design process, GSA will consider the use of infiltration devices to mitigate the increase in impervious area. Infiltration devices capture stormwater before it flows into storm sewers or streams and allow it to soak into the ground.
- Several of the proposed buildings will be partially below ground. The underground portions of these buildings could reach a zone of perched groundwater, leading to the potential intrusion of groundwater into the buildings. As part of the building design process, geotechnical engineering will be undertaken as mitigation to verify stormwater and groundwater conditions on the building site, and buildings will be designed and constructed to mitigate potential groundwater intrusion.

#### *Surface Water*

- Erosion and sediment controls will be employed during demolition and construction to minimize indirect impacts to surface water from sedimentation and other pollutants by containing erodible materials within the limits of construction. GSA will employ more than one containment method that may include silt fencing, dewatering filter bags, diversion channels or berms, temporary stormwater basins or sediment traps, temporary inlet protection, stabilized construction entrances, or vegetation stabilization.
- Prior to construction, GSA will obtain all necessary permits and comply with the requirements and guidelines set forth in those permits to minimize adverse impacts. Stormwater management plans will be prepared in accordance with the St. Elizabeths Utility Integration Plan Overall Stormwater Program and approved by DOEE prior to implementation. National Pollutant Discharge Elimination System (NPDES) permit coverage for stormwater discharges under the EPA Construction General Permit will also be obtained. Erosion and sediment control plans will be developed in accordance with the DOEE requirements and also submitted to DOEE for approval. Construction contractors will be required to implement and maintain these erosion and sediment control measures until construction is complete, vegetation has been established, and permanent stormwater controls are in place. Implementation of permanent controls for stormwater quantity and quality outlined in the St. Elizabeths Utility Integration Plan Overall Stormwater Program, including stormwater retention ponds, green roofs, infiltration/bioretenion practices, and water quality inlets, will help contain sediment and other materials to minimize long-term impacts to water quality.

- GSA will contract with an IEM, separate from the construction contractor, to verify that construction complies with all terms and conditions of the permits and approvals. The IEM will inspect erosion and sediment control devices to ensure they are being sufficiently maintained and are effective, in addition to other identified responsibilities. The IEM will report deficiencies to the contractor, GSA, and regulatory agencies, if required, and support efforts to resolve issues in a timely manner. GSA will hold the construction contractor responsible for maintaining compliance and for expeditiously responding to deficiencies identified by the IEM.
- Indirect impacts to surface waters will be reduced over the long-term through the incorporation of onsite stormwater controls. During the building design process, GSA will consider incorporating green infrastructure and low impact development techniques, including bioretention facilities, permeable pavement, bioswales, bio-planters, green roof systems, subsurface structural BMPs, wet ponds, and rooftop disconnection. Following construction, GSA will continue to monitor and maintain the efficacy of erosion and sediment control devices and stormwater management facilities. Also, integrated pest management and turf maintenance practices will be used during landscaping to mitigate the long-term, indirect impacts to surface waters from pesticide and fertilizer applications used on landscaped areas.

### *Vegetation*

- Vegetation will be cleared only as necessary and parking and storage of construction vehicles and equipment will be relegated to assigned staging areas to minimize impacts. Temporary fencing will be placed around or beyond the drip line of remaining trees to protect roots from soil compaction. GSA will consider incorporating green roofs into building designs to mitigate the loss of function, such as stormwater capture and habitat, from the removal of vegetation. To mitigate impacts, native vegetation will be planted, and trees will be replaced at a 3:1 ratio to allow for plant survival rates. Trees with a diameter larger than 36-inches will be replaced at a 5:1 ratio. Replacement tree size will have a minimum diameter of 2.5-inches. Tree protection measures will be implemented with new plantings to prevent deer browse. Additionally, GSA will prevent establishment of invasive species and will institute an Integrated Pest Management Program to control the use of fertilizers, herbicides, and other chemicals used for landscaping.

### *Wildlife*

- Construction fencing will be used to minimize impacts to wildlife from construction activities. Larger wildlife species will be removed from the construction zone prior to installing fencing to prevent isolating animals within the fenced area. GSA will consider landscaping with native species and with species that provide habitat and food sources such as sumac (*Rhus* sp.), serviceberry (*Amelanchier* sp.), and elderberry (*Sambucus canadensis*) to mitigate habitat loss. During the building design process, GSA will also consider planting evergreen species to provide additional shelter for wildlife species and deer-resistant landscaping to mitigate impacts from white-tailed deer. A deer control study will identify the best methods for deer management on the West Campus. Trees to be

planted will include tree protection measures to prevent deer browse from the remaining deer populations within the West Campus.

- To minimize potential impacts to migratory birds, a pre-construction survey will be performed to determine the presence of nests within the limits of ground disturbance. If nests are identified, GSA will avoid vegetative clearing during the nesting period for those species. Trees removed for construction will be replaced to provide long-term mitigation for impacts to migratory bird habitat.

#### *Economy, Employment, and Income*

- GSA will continue to connect construction contractors working on the West Campus redevelopment with the District of Columbia Department of Employment Services and other workforce development and training organizations to assist in meeting the goals of the St. Elizabeths project's small business and hiring efforts. As with past activities on the West Campus, GSA will share the posting of employment and small business opportunities via email group and the St. Elizabeths website ([www.stelizabethsdevelopment.com](http://www.stelizabethsdevelopment.com)). GSA will continue to hold monthly virtual training and informational meetings with various community stakeholders (e.g., workforce development, Advisory Neighborhood Commissioners, District Government, DHS, U.S. Coast Guard representatives, local small businesses, and general contractors) to distribute information regarding upcoming opportunities.

#### *Air Quality*

- The regulatory requirements and best practices identified in Section 5.5.4 of the 2012 EIS to address air quality impacts remain applicable to Master Plan Amendment 2 and include the following:
  - Taking precautionary measures aimed at minimizing short-term increases in dust particulates, and equipment-related emissions during the construction
  - Certifying the absence of asbestos-containing materials for the demolition of buildings
  - Fully evaluating crushing operations for control of fugitive emissions and permitting requirements
  - Complying with anti-idling regulations in the District of Columbia

#### *Noise Mitigation*

- The regulatory requirements and best practices identified in the 2008 and 2012 EISs to address noise impacts during construction related activities and facilities operations remain applicable to Master Plan Amendment 2 and include the following:
  - All construction equipment powered by an internal combustion engine will be equipped with a properly maintained muffler
  - Air compressors will meet current EPA noise emission standards

- Newer model construction equipment will be used as much as possible since it is generally quieter than older equipment
- Nighttime construction activities will be minimized
- Portable noise barriers within the equipment area and around stationary noise sources will be established
- Tools and equipment will be selected to minimize noise
- Industrial silencers will be installed on stand-by generators

#### *Transportation Mitigation Measures*

- Given the projected degradation of operations at the Gate 1 intersection, the traffic analysis conducted as part of the Master Plan Amendment 2 considered potential roadway improvement options on Martin Luther King Jr. Avenue SE to minimize delays. Based on the results of the analysis, GSA recommends incorporating a continuous right-turn lane on Martin Luther King Jr. Avenue SE to address the delay at the Gate 1 intersection while maintaining operationally acceptable levels of service (LOS D or better) in all other traffic movements.
- Measures to mitigate impacts from construction traffic will be defined as part of the design process during each phase of construction.

#### *Electrical Service*

- Facilities will be designed to reduce energy consumption as mitigation. Energy efficiency will be promoted through GSA's goal to achieve the LEED Gold rating on new construction. GSA will incorporate energy conservation measures into building designs to reduce demand on electrical services. These measures may include building orientation, daylighting (i.e., using natural sunlight to potentially reduce energy needs for interior lighting), and installing energy-efficient lighting and heating and cooling systems.

#### *Natural Gas Service*

- Facilities will be designed to be energy and water efficient thus reducing demand on the CUP which utilizes natural gas. Energy efficiency will be promoted as mitigation through GSA's goal to achieve the LEED Gold rating on new construction.

#### *Water Service*

- Water consumption will be mitigated through GSA's goal to achieve a LEED Gold rating on new construction. GSA will consider reducing water consumption by installing native and drought-tolerant plants in landscaping that require less watering, reusing gray water for irrigation, installing water-saving faucets and toilets in bathroom and kitchen facilities, and changing custodial operations to minimize demand for potable water.

#### *Sanitary Sewer System*

- Reduced water consumption will result in an associated reduction in sanitary sewer volumes. Measures to reduce water consumption are described above. Upgrading the sanitary sewer collection system on the plateau and Sweetgum Lane sites will also provide mitigation and reduce demand by fixing damaged pipes that are allowing stormwater to infiltrate the sewer system.

#### *Solid Waste Management*

- Recycling programs will serve as mitigation and will be implemented during construction and operation of facilities at the plateau and Sweetgum Lane sites to reduce the volume of solid waste leaving the West Campus for disposal.

#### *Environmental Contamination Mitigation Measures*

- Prior to disrupting contaminated soils, areas with recognized environmental conditions will be characterized for removal and disposal by a licensed contractor in compliance with required waste characterization protocols. Prior to the commencement of demolition or renovation activities, it may be necessary to abate asbestos containing material (ACM), lead-based paint (LBP), polychlorinated biphenyl (PCB), and mercury. GSA will ensure that all necessary abatements are properly completed in accordance with applicable laws and regulations. Development will not occur until all appropriate conditions have been met and regulator certifications or notices of closure have been obtained.
- Engineering controls, including dust suppression and worker personal protective equipment (i.e., gloves and eye protection), will be used, and a work plan will be developed and implemented, to protect the health and safety of site workers during the removal of hazardous materials and contaminated soils.

#### *Mitigation Measures Outside the Jurisdiction of GSA*

- Roadway improvements will be required along Martin Luther King Jr. Avenue SE at the Gate 1 intersection to provide acceptable current and future LOS under the Preferred Alternative. GSA will continue to coordinate with DDOT for their approval of final designs for the intersection improvements, as well as to determine appropriate funding sources for such improvements. DDOT will continue to have maintenance responsibilities of these transportation improvements.

## Conclusion

This ROD documents the specific components of my decision and the rationale for my decision to select the Preferred Alternative -- Alternative B identified in the FEIS as the basis for the Master Plan Amendment 2 for the Department of Homeland Security Headquarters Consolidation at St. Elizabeths West Campus in Washington DC. This decision is based on information and analyses contained in the St. Elizabeths Master Plan Amendment 2 Draft EIS issued in June 2020; the Master Plan Amendment 2 Final EIS issued in August 2020 (Appendix A) which documents proposed mitigation measures; the Section 106 MOA executed in September 2020 (Appendix B) which documents mitigation measures; the comments from Federal and state agencies, stakeholder organizations, members of the public, and elected officials; and other information in the administrative record.

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Thomas M. Gallas  
Acting Chairman  
National Capital Planning Commission

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Date

### Attachments:

- Appendix A: FEIS (available [here](#))
- Appendix B: Section 106 Memorandum of Agreement