

## **Record of Decision (ROD) to Unify and Consolidate DHS Headquarters facilities at the St. Elizabeths Campus, Washington D.C.**

The Department of Homeland Security (DHS) prepared this ROD for the occupancy of the Consolidated HQ at the St Elizabeths Campus and associated functions and operations thereupon. This ROD includes a summary of the EISs that DHS adopted from the General Services Administration (GSA) as well as other relevant documents and studies, such as the GSA Master Plan for St Elizabeths and the DHS Housing Plan. This ROD includes a statement of our decision and continued commitment to assist GSA in its mitigation measures at the campus.

### **DHS Housing and Collocation Needs**

The Department proposes to secure and strengthen DHS's operations by unifying our core headquarters facilities with those of our operating components. This consolidation will be located at the St. Elizabeths Campus in Southeast Washington, District of Columbia (DC). From its inception, DHS was dispersed and housed in about 70 buildings varying from 40 to 50 locations in and around the National Capital Region. To this day, the housing situation adversely impacts critical communication, coordination, and cooperation across components, particularly in responding to significant natural disasters or terrorist threats. DHS wanted to foster a “one-DHS” or “Unity-of-Effort” culture and optimize prevention and response capabilities across the spectrum of operations. Due to the magnitude of the Department’s real estate lease commitments in the NCR, costs continue to be an important consideration. To lower overall costs, the Department also needs to minimize the total number of locations housing DHS components. Over the course of the next 10 years, approximately 4.7 million GSF of DHS leased office space will have to be replaced. Without implementation of the Master Plan, DHS would be compelled to occupy predominately leased space. DHS would forego multiple vital efficiencies gained through shared services and collocation while incurring higher real estate and security costs.

The Department remains steadfast that a collective realignment of our real property holdings will yield organizational benefits and Departmental synergies that cannot be achieved at disparate locations. Among the most important of these efficiencies is an urgent need to expand and collocate the Department’s National Operations Center and certain intelligence analytic capabilities, with various operations centers and intelligence analytic capabilities currently maintained at diverse locations by DHS’s seven operating components. By doing so, these centers of operational integration can routinely collaborate, work together and be supported by a very large number of DHS executives and employees currently dispersed across the region. Integration will bring significant operational discipline and improved capability.

The DHS mission demands an integrated, coordinated approach to all hazards. The current legacy facilities, some with sub-optimal security protections, are dispersed throughout the National Capital Region (NCR). This adversely impacts critical communication, coordination, and cooperation across DHS components. To support the incident management and command-and-control requirements of our mission, the Department clearly needs to consolidate executive leadership and operational management in a secure setting. When the notion of a consolidated campus was in development, DHS was in the throngs of the lessons learned from 9/11 and

Hurricane Katrina. That notion was once again reinforced more recently, during Hurricane Sandy, the Boston Marathon bombing, the Orlando shooting and a major cyber breach. *These more recent incidents further demonstrate the critical and continuing requirement that DHS operate with increased integration to prevent, prepare for and respond to any natural disaster or terrorist attacks.*

## **St Elizabeths as the Consolidated DHS Campus Location**

In 2006, based on DHS' housing needs, GSA, the agency responsible for meeting DHS's requirements, determined that the redevelopment of St. Elizabeths West Campus was the only reasonable alternative that would provide secure office space within the National Capital Region. The Saint Elizabeths West Campus is a 176-acre site on the western side of Martin Luther King, Jr. (MLK) Avenue in Southeast Washington, DC. The United States Department of Health and Human Services (HHS) operated the Saint Elizabeths Psychiatric Hospital until 1984 when the hospital operations along with the entire east campus were transferred to the District of Columbia by act of Congress. HHS retained ownership of the west campus until, having determined that it no longer needed the property, HHS declared the Saint Elizabeths West Campus excess in January 2001. The GSA took control of the property for redevelopment in December 2004.

GSA initiated a Master Planning Process in 2004. That process provides for the detailed planning of the campus to include the office space and shared-use space for both new and adaptively re-used buildings. That process included both EISs under the National Environmental Policy Act (NEPA) and compliance with the Section 106 regulations under the National Historic Preservation Act (NHPA). On January 8, 2009, the National Capital Planning Commission (NCPC) approved the Final Master Plan for the DHS Headquarters Consolidation. The Final Master Plan provides the development framework for accommodating the DHS and component headquarters at St. Elizabeths and provides for the setbacks and security protocols consistent with DHS Interagency Security Committee (ISC) Level V.

## **Legislative Overview**

**Public Law 109-241 (2006)**, the Maritime and Transportation Act provided for specific language requiring the Administrator of General Services to submit to the Committee on Transportation and Infrastructure of the House of Representatives and the Committee on Commerce, Science, and Transportation and the Committee on Environment and Public Works of the Senate a plan—

- (1) to provide road access to the site from Interstate Route 295;
- (2) for the design of facilities for at least one Federal agency other than the Coast Guard that would house no fewer than 2,000 employees at such location;
- (3) to provide transportation of employees and visitors to and from sites in the District of Columbia metropolitan area that are located within close proximity to St. Elizabeth's Hospital;
- (4) for the construction, facade, and layout of the proposed structures, including security considerations, parking facilities, medical facilities, dining facilities, and physical exercise facilities on the West Campus;

- (5) that analyzes the costs of building restrictions, planning considerations, and permitting requirements of constructing new facilities on or near historic landmarks and historic buildings (especially those known to possess medical waste, lead paint, and asbestos);
- (6) that analyzes the feasibility of relocating Coast Guard Headquarters—
- (A) to the Department of Transportation Headquarters located at L'Enfant Plaza;
  - (B) to the Waterfront Mall Complex in Southwest District of Columbia; and
  - (C) to 3 alternative sites requiring either new construction or leasing of current facilities (other than those referred to in subparagraphs (A) and (B)) within the District of Columbia metropolitan area that accommodate the Coast Guard's minimum square footage requirements; and
- (7) that analyzes how a potential move to the West Campus of St. Elizabeth's Hospital would impact—
- (A) the Coast Guard's ability to access and cooperatively work with the Department of Homeland Security and the other Federal agencies of the Department; and
  - (B) plans under consideration for relocating all or parts of the headquarters of the Department of Homeland Security and other offices of the Department.

The DHS is satisfied that these plans are complete or in progress to a sufficient level of investment that DHS, in addition to the USCG, can begin to consolidate at the campus.

### **Adoption of GSA 2008 FEIS and 2012 FEIS**

The GSA prepared numerous environmental, technical, historic preservation, transportation, and other documents in support of its decision to redevelop the St Elizabeths Campus. Most notably, GSA prepared two Environmental Impact Statements. The EISs entitled *Department of Homeland Security Headquarters at the St. Elizabeths West Campus To Consolidate Federal Office Space on a Secure Site Washington DC* (EIS Number 20080452) and the Supplemental EIS entitled *Department of Homeland Security Headquarters at the St. Elizabeths West Campus To Consolidate Federal Office Space on a Secure Site Washington DC* (EIS Number 20120049) were noticed in the Federal Register on November 7, 2008 and March 2, 2012 respectively. The public participation and consultative process for both EISs involved over 30 different stakeholders -- public entities, non-governmental organizations and private citizens. DHS acted as a cooperating agency for both EISs and has been closely coordinated with GSA since the initial proposal to redevelop St Elizabeths began.

In accordance with 40 CFR 1506.3, on April 8, 2016, DHS adopted both of GSA's EISs to support this ROD to begin unifying our core headquarters facilities with those of our operating components. Upon careful and independent review of the 2008 GSA FEIS as supplemented by the 2012 FEIS, DHS considered the documents to remain relevant and cogent analyses of the impacts to the campus and other affected resources and adopted them as final statements. GSA's decision to retro-fit and build-out the campus is substantially the same as DHS' decision to occupy and consolidate to the space. As a cooperating agency to GSAs EISs, DHS comments and concerns were continually and adequately addressed. Therefore, recirculation of the EISs was not required. This ROD is for DHS' consolidation and occupancy of the campus at St. Elizabeths and future activities and operations associated therein.

## **DHS proposes to begin Consolidating onto the Campus**

In 2013, after completion of the Munro Building, the United States Coast Guard (USCG) Headquarters and USCG programs moved to St. Elizabeths from multiple locations within the NCR. Since that time, and because of numerous internal and external changes, DHS conducted a review of its housing needs and the overall timing of filling the space. The overall department management of leases and timing of occupancy at St. Elizabeths was a driving factor in this review. DHS considered how the campus development contributes to “Unity of Effort” across the DHS Organization, by consolidating leadership and co-locating Headquarters functions including, Policy, Management, and Operational organizations to the extent possible. The review ensured that DHS space within the National Capital Region meets the Department’s Real Property policies, objectives, and space efficiency targets. Since development of the initial St. Elizabeths plan, between 2006 and 2009, the operational and real estate landscapes changed across the Federal Government in general and within DHS specifically, particularly as to lease space. DHS must make some adjustments to its original requirements and plan, but none so much that any adjustment would require an additional environmental analysis. DHS considered elements impacting the current real property environment including:

- direction from OMB’s “Freeze the Footprint” and “Reduce the Footprint” to halt and reduce the expansion of office and warehouse space;
- the increasing trend in the workplace towards “flexible workspace” designs and proliferation of remote teleworking
- severe pressure to reduce budgets created funding delays and shortfalls for GSA and DHS in executing the St. Elizabeths construction plan.

DHS reviewed this information in the context of the consolidated campus and decided that occupancy of and consolidation to the campus should continue and should be conducted consistent with the expiration of DHS leases across the NCR. While this may mean in certain cases that the exact components of DHS that occupy the campus may not be the same as originally contemplated, DHS does commit that the personnel, traffic and other activities will not exceed the space and associated infrastructure that has been analyzed in the EISs.

## **Alternatives**

DHS can either continue its current practice of renewing disparate leases or continue to work with GSA and consolidate to the St Elizabeths campus. In accordance with 40 CFR 1502.14(e), DHS’ preferred alternative is to occupy and consolidate to St. Elizabeths. DHS will unify our core headquarters facilities with those of our operating components at the St Elizabeths Campus. As construction allows, and, as current DHS leases expire in the NCR, DHS will move to St Elizabeths.

## **Environmentally Preferable Alternative**

The environmentally preferable alternative is consistent with GSA’s identified environmentally preferable alternative in the GSA ROD. DHS consolidation to the campus includes the

redevelopment and the transportation improvements associated with getting personnel to the campus. Prior to the DHS housing requirements, the St Elizabeths West Campus was in a state of severe neglect and dilapidation. Redevelopment and on-going use and management of the campus is environmentally preferable. That acknowledged, amongst the redevelopment and transportation alternatives, the following table is excerpted from GSA’s ROD and represents DHS’s position that, generally, redevelopment of the campus and consolidation to the campus is environmentally preferable and within the redevelopment alternatives, the environmentally preferable alternative varies by resource.

**Table 1. Environmentally Preferable Alternative by Resource**

<b>Resource Area</b>	<b>Federal Use Parcel</b>	<b>I295 Malcom X Interchange Improvements</b>	<b>MLK Improvements</b>
Natural Resources	Alternative B	Alternative 2 Modified	Alternative 1
Cultural Resources	Alternative A, B or C	Alternative 2 or 2 Modified	Alternative 1 or 2
Socioeconomics	Alternative A, B or C	Alternative 2 Modified	Alternative 1
Air Quality	Alternative A or B	Alternative 2 or 2 Modified	Alternative 1 or 2
Noise	Alternative A, B or C	Alternative 2 or 2 Modified	Alternative 1 or 2
Transportation	Alternative A, B or C	Alternative 2 Modified	Alternative 1
Utilities	Alternative A, B or C	Alternative 2 or 2 Modified	Alternative 1
Environmental Contamination	Alternative A, B or C	Alternative 2	Alternative 1

**Affected Environment and Consequences**

DHS considers environmental factors equally with technical, operational and economic factors. The federal personnel and visitors will be working and carrying out the daily business of DHS in a manner similar to what and how they do today in and around the NCR. This day-to-day business is not expected to have any adverse effect to the planned and executed “as-built” campus itself. DHS will move its personnel to the campus as construction continues to be completed, and, concordant with the expiration of corresponding leases across the organization. This determination and consideration regarding the movement of personnel to and from the campus on a daily basis are thoroughly considered in GSA’s EISs, which DHS has adopted. DHS has also committed to an active role in GSA’s transportation management plan and in the long-term operation of the campus. All of those impacts are expected to be consistent with GSA’s analyses in both EISs [http://www.stelizabethsdevelopment.com/document\\_center.cfm](http://www.stelizabethsdevelopment.com/document_center.cfm).

## Statement of Decision

Based on a review of the alternatives, the environmental impacts analyzed in the EISs, comments from all stakeholder, mitigation, and other factors discovered and analyzed during the NEPA process, it is the decision of the Department of Homeland Security to unify the department by consolidating the St. Elizabeths Campus. This decision is made with the knowledge of all the current conditions of the property and having reviewed the 2008 and 2012 EISs and determined them to remain cogent analyses.

This ROD is hereby approved as of the 15<sup>th</sup> November 2016



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