US Citizenship and Immigration Services Headquarters Consolidation

Final Environmental Assessment

February 2017

Prepared by:

The US General Services Administration

With Technical Assistance from:

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Environmental Assessment

Responsible Agency:
US General Services Administration
National Capital Region
301 7th Street, SW
Washington, D.C. 20407

US Citizenship and Immigration Services
Headquarters Consolidation

Abstract

The US General Services Administration (GSA), National Capital Region, in cooperation with US Citizenship and Immigration Services (USCIS) has prepared this Environmental Assessment (EA) for the lease consolidation of US Citizenship and Immigration Services offices. Currently, USCIS has six leased locations in Northern Virginia and throughout Washington, DC, resulting in operational inefficiencies. GSA is proposing to acquire space through leasing in order to co-locate USCIS headquarters into one leased location in order to improve functional efficiency. The delineated area for the lease is Northern Virginia (Crystal City/Pentagon City), Southern Prince George's County in Maryland (South of Route 4), and Washington, DC (Downtown, Southwest, Capitol Riverfront Business Improvement District, Southeast, St. Elizabeth's East Campus; Parkside, North of Massachusetts Avenue; and Waterfront); and within 2,640 walkable linear feet (approximately ½-mile) of a Metrorail station. The number of federal employees to be co-located is approximately 3,200. GSA would enter into a lease agreement for up to 575,000 rentable square feet of space.

The EA has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended. Probable environmental impacts and potential mitigation measures have been identified for the action alternative location for the consolidation of the USCIS Headquarters and the No-Action Alternative.

Questions or comments on the EA should be addressed to:

US General Services Administration
National Capital Region
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Table of Contents

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List of Acronyms

ACHP	Advisory Council on Historic Preservation
ACOE	United States Army Corps of Engineers
ACS	American Community Survey
ADT	Average Daily Traffic
AEMS	Advanced Emergency Medical Services
AM	Ante Meridiem
APE	Area of Potential Effect
ASTM	American Society for Testing and Materials
AVO	Average Vehicle Occupancy
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLV	Critical Lane Volume
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act of 1972
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EMS	Emergency Medical Services
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
ESD	Environmental Site Design
FEMA	Federal Emergency Management Agency
FHWS	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FPPA	Farmland Protection Policy Act
GSA	Unites States General Services Administration
gsf	gross square footage

HCM	Highway Capacity Manual
HVAC	Heat, Ventilation, Air Conditioning
ISC	Interagency Security Committee
ITE	Institute of Transportation Engineers
IWG	Interagency Federal Working Group
LEED®	Leadership in Energy and Efficiency
LOS	Level of Service
MARC	Maryland Rail Community Service
MBTA	Migratory Bird Treaty Act
MBSS	Maryland Biological Stream Survey
MDE	Maryland Department of Environment
MDNR	Maryland Department of Natural Resources
MD SHA	Maryland State Highway Administration
MHT	Maryland Historical Trust
M-NCPPC	Maryland-National Capital Park and Planning Commission
mph	miles per hour
MSAT	Mobile Source Air Toxics
MWCOG	Metropolitan Washington Council of Governments
M-X-T	Mixed-use Transportation Oriented
NAAQS	National Ambient Air Quality Standards
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO_x	Nitrogen Oxide
NO_2	Nitrogen Dioxide
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O_3	Ozone
OMB	Office of Management and Budget
Pb	Lead
PEPCO	Potomac Electric Power Company
$PM_{2.5}$	Fine Particulate Matter (particles with a diameter of 2.5 micrometers and smaller)

PM_{10}	Particulate Matter (particles with a diameter of 10 micrometers or less)
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RLP	Request for Lease Proposal
Rsf	rentable square footage
SAV	Submerged Aquatic Vegetation
SF	square footage
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SWPPP	Stormwater Pollution Prevention Plan
TCC	Tree Canopy Cover
TCP1	Tree Conservation Plan Type 1
TCP2	Tree Conservation Plan Type 2
TMP	Transportation Management Plan
USCIS	United States Citizenship and Immigration Services
USDA	United States Department of Agriculture
USFWS	United State Fish and Wildlife Service
USGBC	United States Green Building Council
USGS	United States Geologic Survey
UST	Underground Storage Tank
v/c	Volume to capacity
VOC	Volatile Organic Compound
WMATA	Washington Metropolitan Area Transit Authority
WSSC	Washington Suburban Sanitary Commission
WWPS	Waste Water Pumping Station

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1.0 Introduction

The US General Services Administration (GSA) has prepared this Environmental Assessment (EA) to assess and report potential impacts resulting from the acquisition of space through leasing for the US Citizenship and Immigration Services (USCIS) Headquarters.

The National Environmental Policy Act (NEPA) requires Federal agencies to prepare an EA to determine if an action has the potential to significantly affect the quality of the human environment. GSA has prepared this analysis in cooperation with USCIS to disclose to the public the potential environmental impacts that the lease consolidation of USCIS in Camp Springs, Maryland may have on the human environment, including impacts to natural resources such as air and water quality, social resources such as community services and facilities, and cultural resources such as archaeological resources.

In addition, GSA is integrating the Section 106 consultation process as required by the National Historic Preservation Act (NHPA) with the NEPA process. GSA is using this EA to provide information regarding potential adverse effects to historic resources that may result from the proposed lease consolidation.

COOPERATING AGENCIES

USCIS is acting as a cooperating agency for this EA. Cooperating agencies, as defined by 40 CFR 1501.6 and 1508.5, are Federal agencies other than the lead agency which have jurisdiction by law or special expertise with respect to any environmental impact under the proposed action.

The public is encouraged to review this document to learn more about the proposed USCIS lease consolidation and its potential impacts. The public is also encouraged to provide comments on the EA.

Written comments on the EA may be sent to:

US General Services Administration
National Capital Region
Mr. Paul Gyamfi
Office of Planning and Design Quality
301 7th Street, SW, Room 4004
Washington, D.C. 20407

1.1 What is GSA Proposing?

The GSA, National Capital Region is proposing to acquire space through leasing to co-locate 3,200 USCIS employees into a single location in Camp Springs, Maryland. Currently, USCIS occupies leased space at six different locations (Figure 1):

- 20 Massachusetts Avenue, NW, Washington, DC
- 111 Massachusetts Avenue, NW, Washington, DC
- 131 M Street, NE, Washington, DC
- 1200 First Street, NE, Washington, DC
- 633 Third Street, NW, Washington, DC
- 2121 Crystal Drive, Arlington, VA

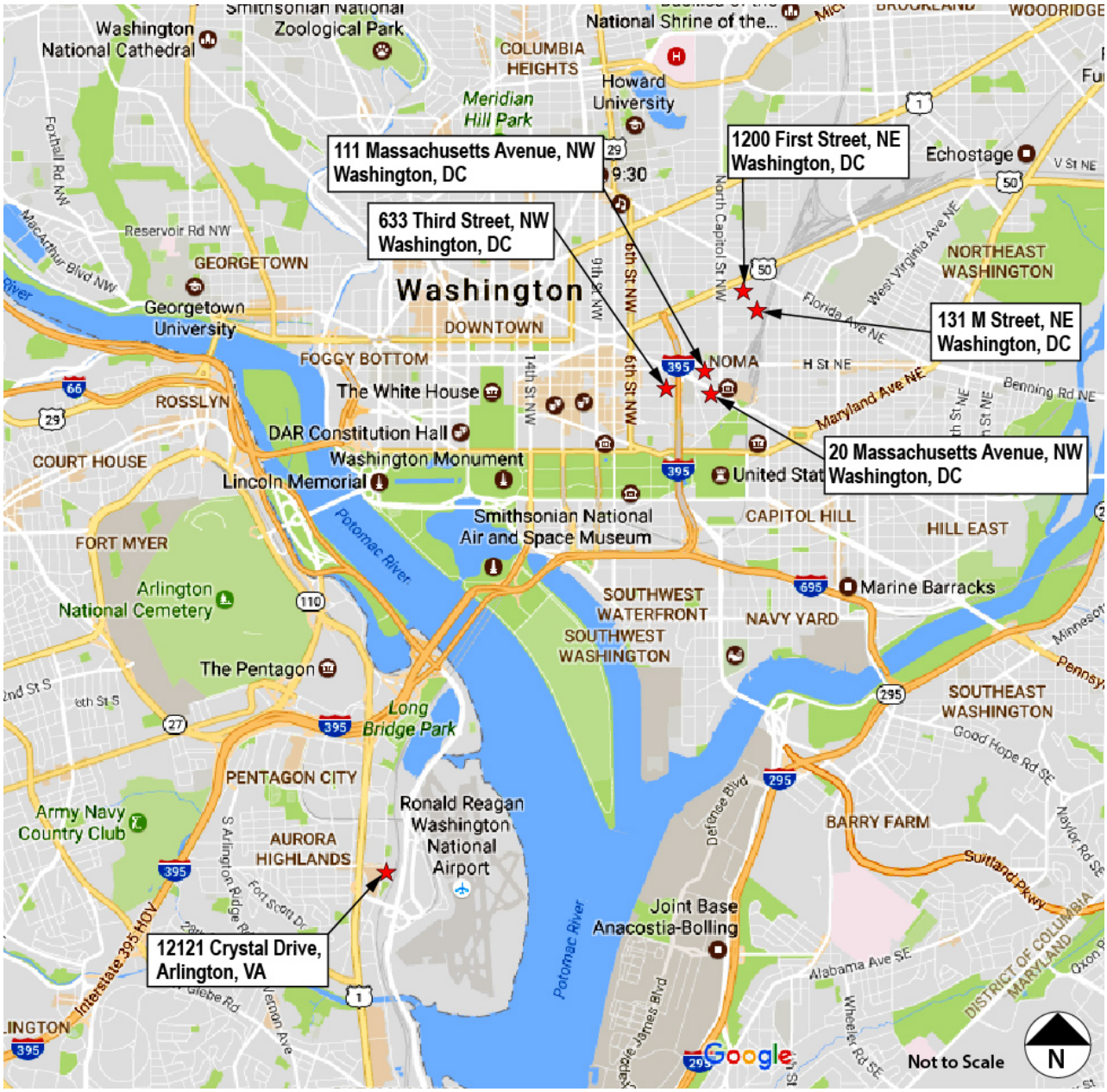

Figure 1. USCIS Existing Locations to be Consolidated

GSA would enter into a lease agreement for approximately 575,000 rentable square feet (rsf) of space. The delineated area for the lease is Northern Virginia (Crystal City/Pentagon City), Southern Prince George's County in Maryland (South of Route 4), and Washington, DC (Downtown, Southwest, Capitol Riverfront Business Improvement District, Southeast, St. Elizabeth's East Campus; Parkside, North of Massachusetts Avenue; and Waterfront); and within 2,640 walkable linear feet (approximately ½-mile) of a Metrorail station. The leased facility must be located in one location of no more than two buildings, and the Federal government must be the sole tenant. Specifically, if there is more than one building, the proposed consolidation must adhere to the following requirements:

- The buildings offered can be no more than 1,320 walkable linear feet apart;
- The space must be contiguous on full and adjacent floors; and
- Each building must follow the most recent Interagency Security Committee's (ISC) Security Standards Level IV.

Other requirements in the Request for Lease Proposals (RLP) include:

- The building(s) must meet the requirements of Leadership in Energy and Environmental Design for New Construction (LEED® NC) Silver level or LEED® – Existing Buildings (EB) Silver level; and must meet the requirements of LEED®- Commercial Interiors (CI) Certified level.
- The building(s) must earn the ENERGY STAR®.
- The building(s) must be within 2,640 walkable linear feet from a Metrorail Station and two or more public or campus bus lines must be located within the immediate vicinity, but not exceeding 2,640 walkable linear feet.
- In addition, approximately 635 square feet (sf) would be reserved for vending facilities in accordance with the Randolph Sheppard Act.

The proposed action is the consolidation of these six locations and a replacement lease of approximately 575,000 rsf of space, a garage with up six stories and approximately 990-1,400 parking spaces, of which eight would be reserved for GSA fleet vehicles.

1.2 What is the Purpose for Consolidating the USCIS?

The purpose of the proposed action is to consolidate the various leased USCIS headquarters offices into one location to improve functional efficiency and effectively support the agency's mission.

1.3 Why Does the USCIS Need to be Consolidated?

Space is needed for USCIS that will efficiently and effectively support the agency's mission. USCIS' current multiple locations have created administrative inefficiencies such as duplication of resources. USCIS seeks to reduce operational redundancies and foster increased efficiency. The proposed co-location would reduce energy consumption, allow support for information technology, provide necessary security measures, and provide collaboration and cohesiveness throughout the USCIS headquarters. In addition, through consolidation of the USCIS headquarters offices into one location, the Federal government would reduce expenses that are associated with having multiple leased locations.

This action is in accordance with Executive Order (EO) 13589 and Office of Management and Budget Memorandum M-12-12 Section 3 which requires agencies to reduce their civilian real estate inventory through consolidation, co-location, or disposal of space from the inventory.

1.4 Relevant Environmental Laws and Regulations

1.4.1 What is NEPA and the NEPA Process?

NEPA is the nation's legislative charter for protection of the environment. NEPA requires Federal agencies to consider environmental impacts of their projects during Federal agency planning and decision-making. NEPA requires Federal agencies to prepare an EA if the significance of the impacts that may result from the proposed action is unknown. GSA's EAs and other NEPA documents are prepared in accordance with the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations (CFR) 1500-1508), GSA Order ADM 1095.1F-Environmental considerations in decision making, and the Public Building Service (PBS) NEPA Desk Guide (October 1999). Public involvement is an important part of the NEPA process. Title 40 CFR Part 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken." By involving citizens, stakeholder groups, and local, state, and Federal agencies, the Federal government can make better informed decisions.

Title 40 Code of CFR Part 1500.1(b) states, "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken."

Through the NEPA process, the public has had and will continue to have opportunities to comment on the lease consolidation of the USCIS Headquarters. "Scoping" is a tool for identifying the issues that should be addressed in the EA and Section 106 processes. Scoping allows the public to help define priorities and express stakeholder and community issues to the agency through written comments. GSA initiated the public involvement processes through the distribution of scoping letters to Federal, State, local agencies, elected officials, and other interested parties. The scoping period for the proposed action was open from November 10, 2016 through November 25, 2016. In addition, two scoping meetings were held. One for USCIS employees was held on November 9, 2016 at the 111 Massachusetts Avenue, NW USCIS location and one for the public on November 10, 2016 at Princeton Elementary School in Camp Springs, Maryland. GSA received 44 comments during the scoping period. The key issues identified during scoping included the following:

NEPA PUBLIC INVOLVEMENT PROCESS

Scoping

November 2016

Publication of Final EA and FONSI

February 2017

- Security
- Environmental Contamination/Remediation
- Air Quality
- Energy Consumption
- Utilities including Broad Creek Pumping Station
- Increased traffic
- Increase/change in commute
- Parking
- New commuter bus routes

- Impacts to Henson Creek

Comments received during the scoping period were taken into consideration during the development of the EA. In addition, one comment was received from the Maryland Department of Natural Resources (MDNR) on November 22, 2016 and one from the US Environmental Protection Agency (EPA) on November 21, 2016. The MDNR requested GSA to consider impacts to Henson Creek and to take into consideration the Forest Conservation Act. The EPA provided information on NEPA for GSA to consider in the development of the EA. Scoping comment letters received can be found in Appendix B.

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, archaeology, engineering, and culture.

1.4.2 What is Section 106 of the National Historic Preservation Act?

The NHPA of 1966, governs Federal agencies in their handling of historic properties. Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation (ACHP) as well as interested consulting parties, a reasonable opportunity to comment. Under the historic preservation review processmandated by Section 106 as outlined in regulations issued by ACHP (36 CFR Part 800), GSA must evaluate the undertaking to determine if it a type of activity that could effect historic properties, which are defined as and district, site, building or object listed in or eligible for listing in the National Register of Historic Places (NRHP).

Section 106 review encourages preservation of historic properties; however, at times, impacts to historic resources cannot be avoided. When the government must impact historic resources, they are required to consult with local, State, and Federal agencies responsible for historic preservation, local citizens, and groups with an interest in historic preservation. The Maryland Historical Trust (MHT) has concurred with GSA's finding of no adverse effect for this project in a letter dated November 28, 2016. Additionally, GSA initiated consultation with the Delaware Nation and the Delaware Tribe of Indians. Please see Appendix C for all Section 106 correspondence. Additional information on GSA's consultation under Section 106 can be found in Chapter 3.

The public will also be allowed to comment on historic preservation issues during the public review period of this EA.

1.4.3 What Other Environmental Laws and Regulations are Relevant to This Project?

As a Federal agency, GSA must comply with all applicable laws and regulations. GSA is incorporating compliance with these laws and regulations into their project planning and NEPA compliance. In compliance with Section 7 of the Endangered Species Act (ESA), GSA has received information from the US Fish and Wildlife Service (USFWS) regarding any known threatened or endangered species or their habitat within the project area. GSA has also received information from MDNR to consider impacts to Henson Creek and to take into consideration the Forest Conservation Act. **Figure 2** provides a list of potentially applicable laws and regulations.

Statutes

Clean Air Act of 1970 as amended (42 U.S.C. § 7401, et seq.)

Clean Water Act of 1977 as amended (33 U.S.C. § 1251, et seq.)

Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 U.S.C. § 9601, et seq.)

Archaeological Resources Protection Act of 1979 (16 U.S.C. §470aa-mm)

Endangered Species Act of 1973 (16 U.S.C. §1531-1544)

Section 5 of the National Capital Planning Act of 1952 (82 P.L. 592; 66 Stat. 781, et seq.); (codified as amended at 40 U.S.C. §8722(b)(1))

Resource Conservation and Recovery Act of 1976 (42 U.S.C. § 6901, et seq.)

National Energy Conservation Policy Act (42 U.S.C. §8231, et seq.)

Energy Independence and Security Act (42 U.S.C. §17001, et seq.)

National Historic Preservation Act of 1966 (16 U.S.C. § 470, et seq.) (89 P.L. 665 (1966)); (referred to herein as "Section 106")

Regulations

Council on Environmental Quality Regulations (40 Code of Federal Regulations Parts 1500-1508)

36 CFR Part 800 – Protection of Historic Properties

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 Archaeology and Historic Preservation (48 Federal Register 44716)

Plans

Southern Green Line Station Area Sector Plan

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 13690 - Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input

Executive Order 13693 – Planning for Federal Sustainability in the Next Decade

Executive Order 13589 – Promoting Efficient Spending

Figure 2: Statutes, Regulations, Plans and Executive Orders

2.0 Alternatives Development

2.1 How did GSA Determine Potential Sites for the USCIS Lease Consolidation and Were Any Dismissed from Further Consideration?

GSA issued Request for Lease Proposal (RLP) Number 2DC0546 in 2015. The request outlined the minimum requirements that the Government was seeking for the proposed consolidation of the USCIS. From this request, five offers were received. After preliminary environmental analysis review, one location, One Town Center, located in Camp Springs, MD, met the requirements and is described below and analyzed in this EA.

This EA considers one site in Prince George's County known as One Town Center (see Figure 3). The One Town Center site is located on Lot 35 within the Capital Gateway subdivision along Capital Gateway Drive within Camp Springs, Maryland. The site is 10.7-acres that currently consists of an open lot with some mature trees.

Figure 3. One Town Center Site Location

2.2 Alternatives Considered

2.2.1 What is the No-Action Alternative and Why is it Considered?

NEPA requires Federal agencies to consider a No-Action Alternative in their impacts analysis. Evaluating the No-Action Alternative provides a baseline for comparing the environmental impacts of the proposed alternatives for the consolidation of the USCIS. Under the No-Action Alternative, the consolidation of the USCIS to one location would not occur. USCIS would remain in their current leased spaces in Washington, DC and Northern Virginia see (Figure 1). No change to their existing leases and current management and maintenance routines would occur. It is assumed that the developer/owner would address necessary repairs as they arise.

Under the No-Action Alternative, because the proposed project site has received approval for development from the Prince George's County Office of Planning, it is assumed that the proposed project site would be developed even if the Federal government were not to issue a lease for this site.

2.2.2 What Action Alternative Has GSA Evaluated in This Document?

The proposed action assessed in this EA is the co-location of six USCIS locations from other leased office buildings in Washington, DC and Northern Virginia to a new location at One Town Center in Camp Springs, Maryland. The proposed action assessed is the lease of approximately 575,000 rsf of office space, which would yield approximately 550,000 sf of useable area and house approximately 3,200 Federal employees. The proposed action also includes a garage with up to 1,400 parking spaces of which eight would be reserved for GSA fleet vehicles. The building's height and massing would be dependent on the layout of the selected site. The building must also follow the most current ISC Security Standards Level IV.

GSA would utilize the LEED® rating system to apply principles of sustainable design and development to this project. LEED® was developed by the US Green Building Council (USGBC). LEED® consists of a set of prerequisites and credits with specific requirements for obtaining points in order to become a LEED® Green Building. LEED® follows consensus-based voluntary standards for sustainable buildings, while still meeting high-performance expectations. The LEED® rating system grades building plans on sustainable site design, energy savings, water efficiency, carbon monoxide (CO) emissions, indoor air quality, and building materials (USGBC, 2016). The rating scale is scored on a point system with four levels of certification, in order of rating: Certified, Silver, Gold and Platinum. Under the action alternative, the consolidated leased building would be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®- CI. This LEED® rating would increase energy conservation and water conservation for both building construction and design. The leased building must also earn the ENERGY STAR® label conferred by the US EPA, which would also provide effective energy efficiency and conservation.

One Town Center (Action Alternative)

The developer has proposed a four-story building consisting of approximately 590,000 gross square feet (GSF). A garage would be provided that would be up to six stories and include approximately 990-1,400 parking spaces for USCIS employees and visitors, of which eight would be reserved for GSA fleet vehicles. See Figure 4 below for a proposed site plan for the One Town Center site. The proposed project site is within

approximately 1,385 walkable linear feet (approximately ¼-mile) from the entrance to the Branch Avenue Metrorail Station, located on the Green Line.

Figure 4: Proposed Site Plan for the Action Alternative

2.3 What Are the Impacts From Each Alternative?

Table 1 presents, for comparison purposes, a concise summary of each alternative's potential impacts by resource topic, including the No-Action Alternative.

Table 1. Comparison of Impacts

	No-Action Alternative	Action Alternative
Environmental Contamination	A minor, direct, long-term, beneficial impact to public health and safety would occur from the removal of petroleum impacted soils as part of the construction process. During the removal of petroleum impacted soils, construction workers could experience a minor, direct, short-term, adverse impact.	
Soils	Soil erosion and sedimentation could occur during construction activities resulting in minor, indirect, short-term, and adverse impacts to soils. A minor, direct and indirect, long-term, beneficial impact would occur from the removal of petroleum impacted soils as part of the construction process. There would be a permanent loss of soil that would result in a minor, direct, long-term, adverse impact.	
Groundwater Hydrology and Quality	Development on the site would result in a net loss of pervious surface resulting in a minor, direct, long-term, adverse impact to groundwater. A minor, direct, long-term, beneficial impact would occur from the removal of petroleum impacted soils.	
Stormwater Resources	Due to the potential for soil to erode during construction, there would be minor, indirect, short-term, adverse impacts. The increase in impervious surface would result in minor, direct, long-term, adverse impacts.	
Vegetation and Wildlife	The clearing of on-site vegetation would result in minor, direct, long-term, adverse impacts.	
Community Services	The development would contribute an increase in the need for Fire and Emergency Medical Services. There would also be the potential for an increase in the number of calls for police response. There would be a minor, indirect, long-term, adverse impact to community facilities and services.	
Safety and Security	While the increase in daytime population may have the potential to impact crime, it is not quantifiable and not likely to be significant. There would be a minor, indirect, long-term, adverse impact to Police, Fire, and Emergency Medical Services from the increase in need for these services.	
Economy and Employment	The addition of construction workers to the area would result in minor, direct, short-term, beneficial impacts to the local and regional economy, employment and taxes and revenue. Once constructed, employee occupancy would result in minor, direct, and indirect, long-term, beneficial impacts.	
Traffic and Transportation	Increased trips to the site would contribute to negligible, direct, long-term, adverse impacts to the local roadway network.	
Air Quality	Increased emissions from construction equipment could occur during construction activities resulting in minor, direct, short-term, and adverse impacts. An increase in traffic to the site could result in a minor to moderate, long-term, direct, adverse increase in emission levels surrounding the project site.	
Utilities	Small temporary disruptions to services at adjacent properties may occur due to construction activities which would result in negligible, indirect, short-term, and adverse impacts to utilities at the project site. An increase in utility demand from the new development would result in minor, direct, and indirect, long-term, adverse impacts.	
Waste Management	Construction waste would be generated during construction activities which would result in negligible, direct, short-term, adverse impacts to waste management at the project site. Occupancy of the new building would generate additional solid waste and recycling streams which would result in minor, direct, long-term, adverse impacts to waste management at the project site.	

2.4 What Mitigation Measures Would Be Implemented Under the Action Alternative?

Floodplains

No mitigation required.

Wetlands and Streams

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

Mitigation includes:

(a) Avoiding the impact altogether by not taking a certain action or parts of an action.
(b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
(c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
(d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
(e) Compensating for the impact by replacing or providing substitute resources or environments.

(40 CFR 1508.20)

Coastal Zone Management

No mitigation required.

Threatened, Endangered and Sensitive Species

No mitigation required.

Aquatic Biota

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

Visual Quality

No mitigation required.

Cultural Resources

No mitigation required.

Climate Change

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

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

Land Use Planning and Zoning

No mitigation required.

Noise

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

Population and Housing

No mitigation required.

Environmental Justice

No mitigation required.

Environmental Contamination

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

Soil

Prior to construction, the developer/owner would remove the petroleum impacted soils from the site separately from other excavated materials. The soils would be characterized and disposed of in accordance with local, state and federal regulations. An ESCP and SWPPP would be developed in accordance with MDE

regulations for construction activities and maintained onsite throughout construction. The ESCP and SWPPP would outline BMPs including but not limited to silt fence, hay bales, and revegetation of exposed sediment, which would be employed throughout construction. These BMPs would reduce the amount of soil loss from erosion during construction.

Groundwater & Hydrology

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

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

Stormwater Management

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

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

Vegetation and Wildlife

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

The developer/owner would minimize impacts to vegetation and wildlife by limiting the area of ground clearing for structural components (e.g., building, parking lot). Open space with no plans for development would not be used for staging or other construction-related clearing unless it is the only feasible option.

Open areas to remain on the site would be re-vegetated and/or landscaped after construction. Site landscaping would consist of native plant species to the extent feasible. If any nests are present on-site, a Migratory Bird Permit would be obtained from the USFWS.

Economy and Employment

No mitigation required.

Community Facilities

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

Safety and Security

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

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

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

Traffic and Transportation

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

Air Quality

The developer/owner would be required to adhere to accepted state and local construction site air quality control measures in the handling of materials and as part of grading activities. The developer/owner would also be required to implement a dust abatement/emissions control plan for construction activities. BMPs to reduce emissions from construction equipment and control fugitive dust include water spraying of access roads and stockpiles, placing dust covers on vehicles that transport dust-emitting materials, and keeping

disturbed areas to a minimum by developing the site in stages, all of which have been shown to be effective in controlling emissions.

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

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

Utilities

The proposed USCIS Headquarters building would be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®-CI which would minimize the adverse impact to utilities. The proposed building would include water-efficient landscaping and fixtures that would reduce potable water usage by 30 percent. Other sustainable design measures would include high-efficiency lighting, modern and efficient heating and cooling equipment, and ENERGY STAR® appliances. A combination ESD and structural methods would be implemented to retain and treat stormwater onsite, which would reduce stormwater discharges to public storm drains to below current levels.

Waste Management

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

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3.0 Affected Environment and Impacts to the Human Environment

3.1 What is the Affected Environment and How Are Impacts Evaluated?

This chapter of the EA describes the existing conditions of the human environment at the proposed project location and the affects the proposed consolidation of the USCIS Headquarters would have on the proposed project location. The Action Alternative and No-Action Alternative described in Chapter 2.0, Alternatives Development would have varying impacts to natural resources, the social and economic environment, historic resources, and infrastructure (the transportation network and utilities).

Impacts can occur from construction as well as operations of the proposed USCIS Headquarters building. Impacts can also occur both directly at the proposed project site as well as off-site (for instance, employees commuting to the new building would affect existing traffic on roads surrounding the proposed project site). Cumulative impacts from the proposed consolidation of the USCIS Headquarters, when added to other past, present, and future projects are further discussed at the end of this chapter.

Impacts include:

Direct impacts, which are caused by the action and occur at the same time and place.

Indirect impacts, are caused by the action and are later in time or further removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Cumulative impacts result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

(40 CFR 1508.7 and 1508.8)

Potential impacts are described in terms of:

- *Intensity* - are the effects negligible, minor, moderate, or major;
- *Type* - are the effects beneficial or adverse;
- *Duration* - are the effects short-term, lasting through construction or less than one year, or long-term, lasting more than one year; and
- *Context* - are the effects site-specific, local, or even regional.

The thresholds for the intensity of impacts are defined as follows:

- *Negligible*, when the impact is localized and not measurable at the lowest level of detection;
- *Minor*, when the impact is localized and slight, but detectable;
- *Moderate*, when the impact is readily apparent and appreciable; or
- *Major*, when the impact is severely adverse, significant, and highly noticeable.

The effects on the human environment were assessed using best available scientific studies, guidance documents, and information. Resources used to analyze the impacts were obtained from federal, state, and local agencies. These include, but are not limited to, the following:

- EPA analyses and reports
- US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Soil Surveys
- Federal Emergency Management Agency (FEMA) Floodplain Maps
- US Army Corps of Engineers (ACOE) wetland manuals
- USFWS threatened and endangered species lists
- Federal Highway Administration (FHWA) traffic guidance
- Environmental Site Assessments (ESAs)

A complete list of references is included at the end of this EA. For resources that required additional analysis, methodologies are summarized later in Chapter 3.

3.2 What Resource Issues Have Been Eliminated From Further Analysis?

As with any environmental analysis, there are resource issues that are dismissed from further analysis because the proposed action would cause a negligible or no impact. Negligible impacts are effects that are localized and immeasurable at the lowest level of detection. Therefore, these topics are briefly discussed and then dismissed from further consideration or analysis. These resources are:

- Water Resources
  - Floodplains
  - Wetlands and Streams
- Coastal Zone Management
- Threatened, Endangered, and Sensitive Species
- Aquatic Biota
- Visual Quality
- Cultural Resources
- Climate Change
- Population and House
- Environmental Justice
- Noise

3.2.1 Water Resources

Floodplains

Federal activities within floodplains must comply with Executive Order 11988: Floodplain Management (33 CFR 1977) and Executive Order 13690: Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input. Per these Executive Orders, federal agencies are required to avoid adverse effects associated with the occupancy and modification of floodplains to the extent possible, thereby minimizing flood risk and risks to human safety (FEMA, 2006).

The proposed project site is mapped on FEMA Flood Insurance Rate Map (FIRM) panel 24033C0235E, effective September 16, 2016, and is located outside of the 100-year and 500-year floodplains (See Appendix A). Since the proposed project site is not located within the floodplain, the project is not expected to have a measurable effect on the frequency, elevation, intensity, or duration of floods, nor would it impact floodplain function. Therefore, impacts to floodplains have been dismissed from further analysis within this EA.

Wetland and Streams

The USFWS National Wetlands Inventory mapper shows no wetlands on the proposed project site (USFWS 2016a). This was confirmed during a wetland delineation of the proposed project site in July 2007 (Greenhorne & O'Mara 2007). A stormwater management pond is located immediately east of the site. The proposed project site is within the Henson Creek Watershed, which ultimately flows into Broad Creek on the tidal Potomac River (MDNR, 2016). No impacts to the adjacent stormwater management pond or Henson Creek are anticipated. Indirect impacts to Henson Creek and subsequently Broad Creek would be avoided and minimized as much as possible by implementing BMPs during construction, including but not limited to silt fence, hay bales, and revegetation of exposed sediment. An ESCP and SWPPP would be prepared and submitted to Maryland Department of the Environment (MDE) prior to construction. Additional analysis on stormwater management can be found in Section 3.7. Because of these mitigation measures, impacts to water resources would be negligible, indirect, short-term, and adverse. Therefore, water resources were dismissed from further analysis in this EA.

3.2.2 Coastal Zone

The Federal Coastal Zone Management Act of 1972 (CZMA) encourages states to "preserve, protect, develop, and where possible, restore or enhance the resources of the nation's coastal zone" (16 USC § 1451 *et seq.*). Pursuant to Section 307 of the CZMA, all direct Federal actions, Federal license or permit activities and Federal financial assistance activities inside Maryland's coastal zone that have reasonably foreseeable coastal effects must be consistent with the enforceable policies of Maryland's Coastal Zone Management Program (Coastal Program). The process by which the state decides whether a Federal action meets its enforceable policies is called Federal consistency review. As the lead agency for the Maryland Coastal Program, the MDE is responsible for coordinating the review of Federal consistency determinations for Federal projects in Maryland.

The proposed project site is located in Prince George's County, which is within Maryland's Coastal Zone. Therefore, the proposed project is subject to Federal Consistency Review pursuant to the CZMA and the Maryland Coastal Program. On January 15, 2016, MDE was contacted via email with a request for Coastal Zone Federal Consistency Review. MDE concurred via email on February 14, 2016, that the proposed project was consistent to the maximum extent practicable with the enforceable policies of the Maryland Coastal Program. All related correspondence can be found in Appendix C. The proposed consolidation of the USCIS Headquarters would be developed in accordance with all applicable state and local regulations. Therefore, coastal zone management has been dismissed from further analysis in this EA.

3.2.3 Threatened, Endangered, and Sensitive Species

The Federal Endangered Species Act (ESA) of 1973, administered by the USFWS, protects and recovers imperiled species and the ecosystems upon which they depend. Under the ESA, species may be listed as either endangered or threatened. "Endangered" means a species is in danger of extinction throughout all or a significant portion of its range. "Threatened" means a species is likely to become endangered within the foreseeable future. Under Section 7 of the ESA, Federal agencies are required to consult with USFWS to ensure that their actions do not adversely affect listed species.

In Maryland, the Nongame and Endangered Species Conservation Act (Annotated Code of Maryland 10-2A-01), administered by the MDNR Wildlife and Heritage Service, requires that all State and local agencies conserve and protect state-listed threatened and endangered species.

On behalf of GSA, Stantec consulted the USFWS Information for Planning and Conservation (IPaC) web application on October 25, 2016, pursuant to Section 7 of the ESA. No Federally-listed endangered or threatened species or critical habitats were identified in or near the project area (USFWS 2016b). An environmental review request was sent to the MDNR Wildlife and Heritage Service on November 12, 2015, and an additional scoping request was sent on November 4, 2016. Responses from MDNR, dated December 22, 2015 and November 22, 2016, indicate that no records of state-listed rare, threatened, or endangered species were identified. The initiation letters and responses can be found in Appendix C. Because no known listed or endangered species would be impacted by the proposed action, threatened, endangered, and sensitive species were dismissed from further analysis in this EA.

3.2.4 Aquatic Biota

No streams, wetlands, or floodplains exist on the Camp Springs alternative site. A stormwater management pond is located immediately east of the site. In a letter dated November 22, 2016, MDNR provided the following information about aquatic biota that may be affected by the proposed project. The proposed project is within the Henson Creek Watershed, which ultimately flows into Broad Creek on the tidal Potomac River. According to the Maryland Biological Stream Survey (MBSS), Henson Creek consistently scores "poor" to "fair" for the biological integrity of benthic organisms and "good" for the biological integrity of fish species. A total of 13 fish species were documented at the nearest downstream sample site from the proposed project area in 2007. Henson Creek is a tributary to Broad Creek, which is considered an important spawning and nursery area for largemouth bass. Submerged aquatic vegetation (SAV) in Broad Creek is an important habitat component for largemouth bass and can be negatively impacted by sedimentation and turbidity (MDNR, 2016).

No impacts to the adjacent stormwater management pond to the east are anticipated. Some indirect impacts to surface waters on adjacent properties are possible as a result of construction runoff. These impacts would be temporary and would be avoided and minimized as much as possible by implementing BMPs during construction, including but not limited to silt fence, hay bales, and revegetation of exposed sediment. An ESCP and stormwater management plan would be prepared and submitted to MDE prior to construction. Additional analysis on stormwater management can be found in Section 3.7. Because of these

mitigation measures, no impacts to aquatic biota are anticipated. Therefore, aquatic biota impacts were dismissed from further analysis in this EA.

3.2.5 Visual Quality

The proposed consolidation of the USCIS Headquarters would add a multi-story building to the visual environment. The new building would replace a vegetated area with a new building, thus changing the existing aesthetics. However, the scale, design, and use of the proposed facility would be consistent with the surrounding development and zoning designation of the property. Impacts related to nighttime light spillover to adjacent properties would be mitigated through the use of shielding around light fixtures and landscaping with native trees and vegetation. Overall there would be a negligible, direct, long-term, adverse impact to the visual quality of the surrounding area. Because the impacts to visual quality would be negligible, it has been dismissed from further analysis within this EA.

3.2.6 Cultural Resources and Archaeology

The NHPA of 1966, as amended, is the guiding legislation for the identification and preservation of historic properties. Section 106 of the NHPA requires federal agencies to consider the effects of their actions (undertakings) on historic properties. Per the implementing regulations of Section 106 (36 CFR Sec 800), a historic property is defined as "…any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the Nation Register of Historic Places…"

As the lead agency, GSA has entered into consultation with MHT, the Delaware Nation and the Delaware Tribe of Indians to determine if the proposed project would impact any historic or sacred resources. To begin this process, a preliminary Area of Potential Effects (APE) was developed for the proposed project site. As defined by 36 CFR Sec 800.16(d), the APE represents "the geographic area within which an undertaking map directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." GSA has developed an APE for the proposed project site that considers both direct and indirect effects. The boundaries for direct effects are limited to the area in which the project would cause ground disturbance. The boundaries for indirect effects capture all locations from which the projects may be reasonably visible or where they may result in changes to land use, or public access, traffic patterns.

On November 7, 2016 GSA sent a letter to MHT requesting concurrence for their finding of no adverse effects on the proposed project. MHT concurred with the finding on November 28, 2016. Additionally, the Delaware Nation and the Delaware Tribe of Indians were sent consultation initiation letters on November 7, 2016. To date, no response has been received from either tribe. All consultation items can be found in Appendix B.

Because of the minimal potential for the proposed project to have indirect impacts, the APE for the proposed project site was defined by the property boundaries. GSA has identified no resources within the APE that are eligible for listing in the National Register. In 2011 and again in 2015, MHT and Maryland-National Capital Park and Planning Commission (M-NCPPC) were consulted and provided concurrence that development projects would not adversely affect historic resources or archaeology. Based on these factors, cultural resources and archaeology have been dismissed from further analysis within this EA.

3.2.7 Climate Change

Impacts of the proposed consolidation of the USCIS Headquarters on climate change would be mainly due to emissions of nitrous oxides and carbon dioxide from the burning of fuel in construction vehicles and commuters to the site. Emissions generated from construction vehicles would be minimal and temporary in nature in comparison to other local and regional sources of greenhouse gas emissions. Based on the results of the employee commuter survey, approximately 22 percent more employees would drive to work alone if the USCIS consolidates to the One Town Center site. GSA, in coordination with USCIS, would develop a TMP which would outline TDM strategies that would encourage employees to utilize other commute methods besides driving alone. USCIS would implement the TDM strategies in order to reduce the number of cars traveling to the proposed project site and therefore reduce overall vehicle emissions.

The proposed USCIS Headquarters building would be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®- CI. The leased building must also earn the ENERGY STAR® label conferred by the EPA. Through the integration of design elements such as the use of modern heating and cooling equipment, onsite renewable energy sources, and the maximization of daylight, the demand for electricity would be reduced. This decreased demand would offset the power generation required from coal, oil, and/or gas fired sources, resulting in reduced emissions in the region.

Through the minimization measures proposed to reduce the number of daily commuters to the site and the use of energy efficient building standards, the proposed consolidation of the USCIS Headquarters would have a negligible impact on climate change. Therefore, climate change has been dismissed from further analysis within this EA.

3.2.8 Land Use Planning and Zoning

The proposed project site is located on an approximately 10.7-acre parcel of undeveloped land. According to historical records, the site was used for agricultural purposes until World War II. At that time, the property was used as part of a quarry operation and continued to be used as such until the mid-1990s (Stantec, 2015). Currently, approximately half of the parcel is wooded and the other half is heavily vegetated with grasses, shrubs, and small trees.

The proposed project site is zoned M-X-T (Mixed-use, Transportation oriented) and is within a D-D-O (Development District Overlay) Zone (PGAtlas 2016). The M-X-T zoning designation provides for a variety of residential, commercial, and employment uses with at least two of the three uses to be developed on any M-X-T property (M-NCPPC 2016). The proposed project site is surrounded to the north by new residential apartment buildings and the Branch Avenue Metro Station (Green Line) is located to the immediate west. The Washington Metropolitan Area Transit Authority (WMATA) Branch Avenue Rail Yard surrounds the east-northeast sides of the property and the south-southeast sides of the property are located next to wooded land that border single family homes. A zoning map for the property can be found in Appendix A.

The developer/owner of the parcel received approval from the Prince George's County Planning Board for the proposed detailed site plan in 2015. In its decision, the Planning Board concluded that the proposed project was consistent with the current zoning designation and the approved General Plan, Master Plans, and Sector Plans for the area. Although the land use on the site would change from open land to mixed-use

development, it is consistent with surrounding land uses and the overall planning documents for the area. There would be no impacts to zoning as the zoning designation for the property would not change. Therefore, land use planning and zoning has been dismissed from further analysis in this EA.

3.2.9 Noise

The proposed project site is in close proximity to existing sources of ambient noise, including Andrews Airforce Base, the Branch Avenue Rail Yard, the Branch Avenue Metro Station, Suitland Parkway, I-495, and sources associated with residential and commercial uses such as traffic; heat, ventilation, air conditioning (HVAC) units; and pedestrians. The long-term operation of the proposed USCIS Headquarters building would generate minimal additional noise similar to the current sources, such as traffic and HVAC units. A noise pollution control plan would be prepared and implemented to project adjacent public areas from excessive noise impacts during construction. Additionally, noise-reducing building materials including soundproofing windows and insulation would be used to protect USCIS employees from exterior noise pollution sources. Because adverse noise impacts would be negligible, except for temporary construction noise, noise was dismissed from further analysis.

3.2.10 Population and Housing

GSA currently leases six facilities in Northern Virginia and Washington, DC for USCIS operations. The total number of employees to be co-located and visitors to the proposed USCIS Headquarters building would represent an increase in daytime population to the Camp Springs area. No permanent residential populations are planned or currently exist on the proposed project site. The proposed project site and most of its surrounding properties are designated for mixed-use development. Multiple mixed-use apartment and condominium complexes have recently been constructed or are planned for the area directly across from the proposed project site. Additionally, an established residential neighborhood exists just south of the site. The proposed consolidation of the USCIS Headquarters would not require the relocation of any USCIS employees. Over time, some USCIS employees may elect to move closer to the new USCIS Headquarters building. However, based on the results of the employee commuter survey only about three percent of current USCIS employees plan to relocate closer to the proposed project site if the consolidation of the USCIS Headquarters is implemented. Any impacts to population and housing would be negligible and handled by available housing in the area. No housing is currently available on the proposed project site, and the housing that is available in the vicinity of the project would not be adversely affected by the proposed action. Therefore, population and housing was dismissed from further analysis within this EA.

3.2.11 Environmental Justice

Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was issued on February 11, 1994 by President Clinton. This order directs Federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority or low-income populations.

A low-income individual is defined as any individual receiving a total family income below the applicable poverty threshold, as derived from the Office of Management and Budget's (OMB) Statistical Policy Directive 14. Information regarding poverty status of individuals is available from the US Census Bureau at the census

tract level. A low-income population is defined as any census tract with a higher percentage of low-income individuals than the county population as a whole. A minority individual is defined as any individual that is nonwhite or identifies as Hispanic or Latino. A minority population is defined as any census block with a higher percent minority than the county population as a whole.

The proposed project site is located within Census Tract 8019.05, Block Group 2. For the purposes of this analysis, the study area consists of the 12 census blocks that are adjacent to the project site. Only seven of these blocks are populated. Low-income and minority populations were identified through the review of US Census Data from the 2010 Decennial Census and American Community Survey (ACS) 5-Year Estimates for 2014 (US Census Bureau 2016).

Table 2 below provides the percent of minority individuals and the percent of individuals living below the poverty level of the State of Maryland, Prince George's County, Census Tract 8019.05, and the populated blocks within the study area.

Table 2. Percentages of Low-Income and Minority Populations

	Minority Population (%)	Individuals Living Below Poverty Level (%)
Maryland	45.3	10.0
Prince George's County	**85.1**	**9.7**
Census Tract 8019.05	91.3	1.8
Block 2000	86.6	
Block 2001	90.0	
Block 2004	83.7	
Block 2015	83.3	
Block 2019	92.7	
Block 2033	100.0	
Block 2037	81.8	

Source: US Census Bureau, 2010 Census.

The total percentage of nonwhite residents in Prince George's County is 85.1 percent. All populated blocks within the study area had a minority population of at least 82 percent. A total of four blocks within the study area had a higher minority population than the County as a whole. These blocks include Block 2000 with 86.6 percent minority, Block 2001 with 90 percent minority, Block 2019 with 92.7 percent minority, and Block 2033 with 100 percent minority. Therefore, these four blocks are considered to contain minority populations (US Census Bureau 2010).

Poverty information is not available at the census block level, so the presence of low-income populations was determined at the census tract level. The total percentage of low-income residents in the County is 9.7 percent. The median household income between 2009 and 2014 in Prince George's County was estimated at $73,856, which is lower than the state median of $74,149. The median household income of Census Tract

8019.05 is much higher at $91,766. Census Tract 8019.05 has a poverty rate of 1.8 percent. Therefore, Census Tract 8019.05 is not considered a low-income population. (US Census Bureau 2014).

Minority populations are present in the immediate vicinity of the project area; however, the proposed consolidation of the USCIS Headquarters would not disproportionately affect these groups. Any impacts experienced by minority populations would be similar to those experienced by the overall population, therefore, environmental justice was dismissed from further analysis in this EA.

3.3 What Resource Issues Have Been Included For Further Analysis?

As with any environmental analysis, there are resource issues that are analyzed in further detail to compare the environmental consequences of the No-Action and the Action Alternative. The No-Action Alternative and the proposed Action Alternative described in Chapter 2 would have varying impacts to natural resources, the social and economic environment, cultural resources, and infrastructure. The resources analyzed in detail in this EA are:

- Environmental Contamination
- Soils
- Groundwater and Hydrology
- Stormwater Resources
- Vegetation and Wildlife
- Economy and Employment
- Community Facilities and Services
- Safety and Security
- Traffic and Transportation
- Air Quality
- Utilities
- Waste Management

3.4 Environmental Contamination

3.4.1 Are There Any Hazardous Materials or Contaminated Soils or Groundwater at the Proposed Project Site?

A Phase I ESA was performed for the proposed project site in November 2015 to determine the potential for contamination to exist onsite. The Phase I ESA identified petroleum impacted soils related to a former Underground Storage Tank (UST) on the southeast portion of the proposed project site. The petroleum impacted soils were first identified during a previous Phase I ESA performed in 1999. A Phase II ESA was conducted at the time to determine the extent of the contamination. As a result of the findings, MDE determined that the impacted soils did not constitute a risk to public health or the environment and stated that the soil may be left undisturbed and in place. MDE noted that if the petroleum impacted soils would be disturbed by grading activities during future development, MDE should be notified for confirmation sampling and proper removal. The investigation was officially closed by MDE in 2004 (Stantec 2015).

The detailed reports and findings of the Phase II ESA could not be obtained from MDE or the property owner. Therefore, the exact location and depth of the petroleum impacted soils is not known. The 2015 Phase I ESA recommends a limited soil vapor survey to determine the location of impacted soils (Stantec 2015).

3.4.2 Would Hazardous Materials, Contaminated Soils or Groundwater be Disturbed and Would Public Health and Safety be Affected?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts from environmental contamination at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. A minor, direct, long-term, beneficial impact to public health and safety would occur from the removal of petroleum impacted soils as part of the construction process. During the removal of petroleum impacted soils, construction workers could experience a minor, direct, short-term, adverse impact.

One Town Center (Action Alternative)

Prior to construction, the developer/owner would remove the petroleum impacted soils from the site separately from other excavated materials. The soils would be characterized and disposed of in accordance with local, state and federal regulations. The petroleum impacted soils would be removed from the site prior to the construction and occupancy of the new USCIS Headquarters building. With the removal of the petroleum impacted soils, a minor, direct, long-term, beneficial impact to public health and safety would occur. During the removal of petroleum impacted soils, construction workers could experience a minor, direct, short-term, adverse impact from exposure to contaminated soils.

3.4.3 What Measures Would Be Taken to Protect Human Health and the Environment?

Prior to construction of the new USCIS Headquarters building, petroleum impacted soils would be removed from the site separately from other excavated materials, characterized, and disposed of in accordance with local, state and federal regulations. Contaminated soils would be taken to a landfill or facility permitted to accept petroleum impacted soils. Site workers would be required to follow safety protocols and the site safety plan when handling potentially contaminated soils to reduce the potential for exposure.

3.5 Soils

3.5.1 What Are the Soil Conditions at the Proposed Project Site?

The soils of the project site are classified as 96.1 percent Udorthents, reclaimed gravel pits, 0 to 5 percent slopes, and 0.4 percent Udorthents-Urban land complex, 0 to 5 percent slopes (NRCS 2016). Both soils are commonly found in urban areas and are indicative of the former use of the site as a quarry operation. The site is mostly flat with a 30 percent incline on the western side of the property that slopes down to Capital Gateway Drive. The site is vegetated by woodland and grassland areas. The soils of the project site are not classified as hydric, prime, unique, or statewide important farmland; therefore, the site is not subject to the requirements of the Farmland Protection Policy Act (FPPA). A soils map for the project proposed project site can be found in Appendix A.

Soil Types

Udorthents - This complex consists of moderately well drained to excessively drained soils that have been disturbed by cuffing or filling, and areas that are covered by buildings and pavement. The areas are mostly larger than 5 acres.
Urban land - An area where more than 75 percent of the surface is covered by asphalt, concrete, buildings, or other structures.

A Phase I ESA performed in 1999 identified petroleum impacted soils on the southeast portion of the proposed project site. At the time, MDE determined that the impacted soil did not constitute a risk to human health or the environment and stated that the soil may be left undisturbed and in place. MDE noted that if the petroleum impacted soils would be disturbed by grading activities during future development, MDE should be notified for confirmation sampling and proper removal. An updated Phase I ESA was performed in November 2015. The exact location and depth of petroleum impacted soils was not able to be determined at that time (Stantec 2016).

3.5.2 How Would Soils be Affected by the Proposed Project?

No- Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to existing soils at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Soil erosion and sedimentation could occur during construction activities. This could result in minor, indirect, short-term, and adverse impacts to soils. A minor, direct and indirect, long-term, beneficial impact to soils would occur from the removal of petroleum impacted soils as part of the construction process.

One Town Center (Action Alternative)

Prior to construction, the developer/owner would remove the petroleum impacted soils from the site separately from other excavated materials. The soils would be characterized and disposed of in accordance

with local, state and federal regulations. A minor, direct and indirect, long-term, beneficial impact to soils would occur from the removal of the petroleum impacted soils.

Under the proposed consolidation of the USCIS Headquarters, the proposed project site would be cleared and excavated for construction of a new building. Exposed soils may erode during construction which could cause sediments to enter storm drains and eventually streams. To avoid and minimize the impacts of soil erosion and sedimentation, an ESCP would be developed, approved by MDE, and followed during construction. The impact from soil erosion and sedimentation would be expected to be minor, indirect, short-term, and adverse. Long-term, there would be a permanent loss of soil that would result in a minor, direct, adverse impact.

3.5.3 What Measures Would be Taken to Ensure that Erosion and Sedimentation are Controlled?

Under the proposed consolidation of the USCIS Headquarters, the developer/owner would be responsible for developing and implementing an ESCP for approval by MDE and local jurisdictions. The plan would aim to reduce and control sediments entering storm drains and streams during construction. The developer/owner would be required to follow the ESCP during grading and other ground disturbing activities to ensure soil stability is maintained. BMPs would be used to control and minimize sediment movements, including but not limited to silt fences and/or hay bales around the perimeter of the site and revegetation of soils that would be exposed longer than 14 days. Information about the ESCP is also found in Section 3.7: Stormwater Resources.

3.6 Groundwater Hydrology and Quality

3.6.1 What Groundwater Features are Location Within the Project Area?

The proposed project site is located within the North Atlantic Coastal Plain physiographic province. The North Atlantic Coastal Plain Province borders the Atlantic Ocean and includes portions of New York, New Jersey, Delaware, Maryland, Virginia, and North Carolina. It is generally comprised of flat to seaward-sloping lowland underlain by semi-consolidated and unconsolidated sediments of silt, clay, and sand with minor amounts of lignite, gravel, and limestone. The Northern Atlantic Coastal Plain aquifer system is generally fed by surface water infiltration and consists of shallow groundwater which generally follows the topography of the area (USGS, 1997). A United States Geologic Survey (USGS) quadrangle map for the proposed project location can be found in Appendix A.

3.6.2 How would Groundwater be Affected by the Proposed Project?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to groundwater at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Although at least 10-percent of the site would remain open space, development on the site would result in a net loss of impervious surface resulting in a minor, direct, long-term, adverse impact to groundwater. A minor, direct, long-term, beneficial impact to groundwater would occur from the removal of petroleum impacted soils.

One Town Center (Action Alternative)

The proposed project site is currently undeveloped with no impermeable surface area. The proposed activity would result in a net increase in impervious surface area, though at least 10-percent of the site is required to remain open space. The impervious area would reduce rainwater infiltration and groundwater recharge rates. Therefore, there would be a minor, direct, long-term, adverse impact to groundwater.

A Phase I ESA identified petroleum impacted soils on the southeast portion of the proposed project site. Prior to construction of the new USCIS Headquarters building, petroleum impacted soils would be removed from the site separately from other excavated materials, characterized, and disposed of in accordance with local, state and federal regulations. The removal of the contaminated soils would prevent contamination from migrating to groundwater and result in a minor, direct, long-term, beneficial impact to groundwater.

Groundwater would not be used for either potable or industrial purposes at the proposed USCIS Headquarters building. Water utilities would be provided to the building by Washington Suburban Sanitation Commission (WSSC). There would be no impact to groundwater from the operations of the proposed consolidation of the USCIS Headquarters.

3.6.3 What Measures would be Taken to Protect Groundwater?

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

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

3.7 Stormwater Resources

3.7.1 What Regulations are Applicable to The Proposed Project?

Section 438 of the Energy Independence and Security Act of 2007 (EISA) "requires the sponsor of any development or redevelopment project involving a Federal facility with a footprint that exceeds 5,000 square feet to use site planning, design, construction, and maintenance strategies for the property to maintain or restore its predevelopment hydrology with regard to temperature, rate, volume, and duration of flow". EO 13693 also requires Federal agencies to improve water use efficiency and stormwater management by reducing water consumption for landscaping and installing green infrastructure features to help with stormwater management.

At the State level, the Stormwater Management Act of 2007 requires the use of ESD and low-impact development (LID) practices for all new development and redevelopment projects. The Act requires new development projects to capture and treat a minimum of one inch of rainfall onsite using ESD practices such as bioretention, green roofing, and natural site planning. ESD practices must be used to the maximum extent practicable for rainfall in excess of one inch. Structural BMPs are only permitted when management of the full target rainfall event through ESD practices is not practicable.

For stormwater management during construction activities, COMAR 26.17.01: Water Management and 26.17.02: Stormwater Management require construction activities that disturb more than 5,000 sf (0.11 acre) of land area and/or more than 100 cubic yards of earth to prepare a Sedimentation and Erosion Control Plan and a SWPPP consistent with the 2000 Maryland Stormwater Design Manual, Volumes I and II (revised 2009).

The most recent Maryland Stormwater Management and Erosion and Sediment Control Guidelines for State and Federal Projects provides the minimum erosion and sediment control and stormwater management requirements for Federal projects (MDE 2015). The MDE Sediment and Stormwater Plan Review Division is responsible for the review and approval of erosion and sediment control and stormwater plans for Federal projects. Additionally, the Prince George's County Department of Public Works and Transportation also has approval authority of stormwater management concept plans for Federal projects located in Prince George's County.

3.7.2 How Has Stormwater Management at the Proposed Project Site Been Provided?

The proposed project site is currently undeveloped and consists entirely of pervious surface. No permanent stormwater management BMPs exist onsite. A stormwater management pond, owned and maintained by WMATA, is located immediately west of the proposed project site. The proposed project site currently drains into this pond directly or through an existing storm drain system.

3.7.3 How Would the Proposed Project Affect Stormwater?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No construction or alteration of the existing facilities would occur. There would be no impact to stormwater management at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site. Due to the potential for soil to erode during construction, there would be minor, indirect, short-term, adverse impacts to stormwater management at the project site. Due to the increase in impervious surface area and the minimization measures included in the approved 2015 Concept Plan, the No-Action Alternative would result in minor, direct, long-term, adverse impacts to stormwater management at the project site.

One Town Center (Action Alternative)

The proposed project would result in a total increase of 7.31 acres (68 percent) of impervious surface area at the proposed project site. However, a combination of ESD and structural methods to retain and treat stormwater onsite are presented in the 2015 Concept Plan. Due to the urban nature of the proposed project site, there is limited space for ESD features, and it is not feasible to provide stormwater volume retention for 100 percent of stormwater runoff entirely through ESD. However, the proposed ESD measures would provide enough storage to reduce peak discharges to below existing conditions up to the 10-year storm event. The remaining water quality volume not provided through ESD would be directed to an underground stormwater management facility. The only discharges to the existing WMATA stormwater management pond would be as a result of a 100-year storm event. With these measures in place, the proposed consolidation of the USCIS Headquarters would exceed the stormwater retention and treatment requirements of the EISA, EO 13693, the State of Maryland, and Prince George's County. The Prince George's County Department of Public Works and Transportation approved the 2015 Concept Plan on December 16, 2015. Due to the increase in impervious surface area and the proposed minimization measures included in the approved plan, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct, long-term, adverse impact to stormwater management at the proposed project site.

No direct impacts to Henson Creek are anticipated. Some indirect impacts to Henson Creek and other surface waters on adjacent properties are possible due to construction runoff. These impacts would be temporary and would be avoided and minimized as much as possible by implementing BMPs during construction, including but not limited to silt fence, curb inlet protection, hay bales, and revegetation of exposed sediment. An ESCP and SWPPP would be prepared in accordance with the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control and the 2015 Guidelines for State and Federal Projects and submitted to MDE prior to construction. These plans would include a description of necessary control measures to minimize erosion and off-site sedimentation during construction. Therefore, construction of the proposed project is expected to have a minor, indirect, short-term, adverse impact to stormwater management at the proposed project site.

3.7.4 What Types of Stormwater Quantity and Quality Control Measures Would Be Implemented Under the Proposed Project?

As presented in the 2015 Concept Plan, the majority of water quality volume retention would be provided ESD consisting of 31 approved micro-bioretention facilities, including a combination of graded micro-bioretention ponds, planter boxes, and Filterra units. The fire lane along the southeast edge of the parking garage would be constructed with pervious pavement or reinforced turf. The remaining water quality volume not provided through the ESD measures described above would be directed to an underground stormwater management facility located underneath the fire lane along the southeast edge of the proposed parking garage. Stormwater overflow from a 100-year storm event would be directed to the adjacent WMATA stormwater pond to the east. The pond is expected to have sufficient capacity to accommodate this extra discharge.

An ESCP and SWPPP would be prepared in accordance with the 2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control and the 2015 Guidelines for State and Federal Projects and submitted to MDE prior to construction. These plans would include a description of necessary control measures to minimize erosion and off-site sedimentation during construction, including but not limited to silt fence, curb inlet protection, hay bales, and revegetation of exposed sediment.

3.8 Vegetation and Wildlife

3.8.1 What Laws and Regulations are Applicable to the Conservation of Vegetation and Wildlife?

The Migratory Bird Treaty Act (MBTA) prohibits the unauthorized or unintentional take of individual birds, nests, feathers, or eggs of protected species. Any potential impacts to birds, nests, feathers, or eggs requires an Incidental Take permit from the USFWS.

The Forest Conservation Act (COMAR Nat. Res. Art. 5-1601-5-16122) requires that any project with an area exceeding 40,000 square feet that is applying for a grading or sediment control permit in the State of Maryland must have an approved Forest Conservation Plan and Forest Stand Delineation (FSD). Projects to take place on private land must be submitted to the local planning and zoning authority for review. In this case, the local planning and zoning authority is the Prince George's County Environmental Planning Section of M-NCPPC. M-NCPPC evaluates the impacts of land use plans and development proposals on woodlands and wildlife habitats in Prince George's County (County Code Subtitle 25-117, Division 2). This proposed project is subject to the 1989 Woodland Conservation and Tree Preservation Ordinance because it has been previously approved under a Tree Conservation Plan Type 1 (TCP1) under the woodland conservation requirements that were applicable at that time. A site-specific Tree Conservation Plan Type 2 (TCP2) is also required as part of the detailed site plan application. According to the Prince George's County Environmental Technical Manual, a TCP2 must provide more detail than a TCP1, including final proposed grading, actual structure locations, utilities, easements, stormwater management facilities, and a final limit of disturbance, and must present final decisions for woodland conservation and tree protection techniques.

The proposed project site is subject to the requirements of the 2010 Prince George's County Landscape Manual (Landscape Manual) and the Prince George's County Tree Canopy Coverage Ordinance (TCC

Ordinance). The Landscape Manual requires shade and ornamental trees along street frontage, a landscaped buffer between incompatible uses, and native species. The TCC ordinance requires project sites that are zoned M-X-T to provide tree canopy coverage on at least 10 percent of the site. For the proposed project, this amounts to approximately 1.07 acres.

An FSD and Natural Resources Inventory (NRI) were prepared for the proposed project site in March 2011. M-NCPPC Prince George's Planning Department approved the FSD and NRI the same month. The proposed project site is included in a TCP1 for a larger 100-acre development known as Town Center at Camp Springs, which was approved by M-NCPPC on June 28, 2001. A site-specific TCP2 for the 10.7-acre proposed project site was approved in January 2016.

3.8.2 What Types of Vegetation and Wildlife Are Located On or Near the Proposed Site?

The proposed project site is adjacent to undeveloped forested land and medium density residential areas to the east. The proposed project site was previously a gravel pit/quarry until the 1960s; the forested areas on this site became established after the site was graded. Vegetation on this site is considered post-development regeneration, meaning that the forest is young and was established after the site was graded for development.

An FSD was conducted at the proposed project site in March 2011. The FSD Report and NRI Plan, prepared by J. Cook Consultants, are included in Appendix A. Approximately 5.12 acres (46 percent) of the 10.7-acre site consists of forested areas. Two distinct forest stands were identified onsite. Stand F-1, as shown on the NRI, is a mid-successional, 3.02-acre stand dominated by Virginia pine (*Pinus virginiana*). The understory consists primarily of pine, and scattered holly (*Ilex opaca*), oak (*Quercus* spp.), and red cedar (*Juniperus virginiana*). The most common herbaceous and woody plants observed in the forested areas were honeysuckle (*Lonicera* spp.), greenbriar (*Smilax* spp.), multiflora rose (*Rosa multiflora*), and ferns. Non-native invasive species, including Japanese and bush honeysuckle and multiflora rose, make up approximately 20 percent of the ground cover in F-1. The FSD indicates that due to the lack of diversity of tree species and the susceptibility of Virginia pine to wind damage, the stand is in moderate condition with low priority for restoration or preservation (J. Cook Consultants, 2011).

Stand F-2, consisting of two acres as shown on the NRI, is dominated by sweetgum (*Liquidambar styraciflua*) and red maple (*Acer* spp.) trees averaging between six and twelve inches diameter at breast height. The understory consists primarily of sweetgum and red maple. The most common herbaceous and woody plants observed in the forested areas were honeysuckle, greenbriar, multiflora rose, and ferns. Non-native invasive species, including Japanese and bush honeysuckle and multiflora rose, make up approximately 80 percent of the ground cover in F-2. The FSD indicates that this stand is in moderate condition with low priority for restoration or preservation (J. Cook Consultants, 2011).

The non-forested areas consist of cultivated grasses, field weeds such as sedges and fennel, and scattered young trees averaging two to six inches diameter at breast height. A maintained area consisting of mowed fescue is present along Capital Gateway Road. No specimen trees were identified onsite (J. Cook Consultants, 2011). The site is not within a Woodland Conservation Area as designated by the County Planning Department (PGAtlas, 2016).

Stantec consulted the USFWS IPaC web application on October 25, 2016. A total of 25 species of migratory birds protected under the MBTA were identified that could potentially be affected by the proposed project (USFWS, 2016b). According to correspondence with MDNR and the USFWS, no Federally- or state-listed threatened or endangered species or critical habitat have been identified onsite (USFWS 2016) (MDNR 2016). The forested and open areas of the project site may provide habitat for common wildlife species, such as white-tailed deer (*Odocoileus virginianus*), grey squirrel (*Sciurus carolinensis*), common raccoon (*Procyon lotor*), eastern cottontail (*Sylvilagus* spp.), vultures (*Cathartes aura* and *Coragyps atratus*), gray and red foxes, finches, snakes, skinks, and other small mammals and songbirds.

3.8.3 How would Vegetation and Wildlife Be Affected by the Proposed Project?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No construction improvements to these buildings would occur. There would be no impact to vegetation or wildlife at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan, TCPs, and the 1989 Woodland Conservation Ordinance. All vegetation onsite would be permanently cleared during construction, and wildlife would be displaced to adjacent habitat. Site landscaping would be provided in accordance with the Landscape Manual and the TCC Ordinance. The No-Action Alternative would result in minor, direct, long-term, adverse impacts to vegetation and wildlife at the project site.

One Town Center (Action Alternative)

The proposed project would require 100 percent removal of the existing vegetation at the proposed project site, including 5.12 acres of forest. All woodland conservation requirements pursuant to the 1989 Woodland Conservation Ordinance have been met on other parcels within the larger Town Center at Camp Springs development, as shown on the approved TCP1. A site-specific TCP2 was approved in January 2016. The TCP2 is in conformance with the approved TCP1. Per the requirements of the Landscape Manual, the proposed project would include a total of 129 shade trees and 86 ornamental or evergreen trees. A minimum of 50 percent of shade and ornamental trees and 30 percent of evergreen trees would consist of native species. The remaining landscaping would consist of native plant species to the extent feasible. The proposed project would provide tree canopy cover over 1.4 acres of the site, which exceeds the 1.07-acre (10 percent) requirement of the TCC Ordinance. Due to the relatively low quality of forest present onsite and demonstrated conformance with County plans and ordinances, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct, long-term, adverse impact to vegetation at the proposed project site.

The project site is adjacent to an extensive forested area consisting of similar habitat types. Construction activities would result in 100 percent vegetation removal and additional noise and lighting impacts at the proposed project site, which may temporarily displace or deter wildlife and migratory birds in the surrounding area. However, given the existing sources of noise and lighting in the area from the Branch Avenue Railyard, construction noise impacts would be negligible. Wildlife and migratory birds would be

expected to return to the adjacent areas following construction. Wildlife and migratory bird species that occur on the project site would be permanently displaced to adjacent habitat. Due to the availability of abundant adjacent habitat, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct, long-term, adverse impact to wildlife at the proposed site.

The area of the site that is not used for the proposed USCIS Headquarters building would be landscaped with grass and trees following construction activities. Therefore, construction of the proposed project is expected to have a minor, direct, short-term, adverse impact to vegetation at the proposed project site.

3.8.4 What Efforts would be Made to Protect Vegetation and Wildlife?

Due to the relatively low quality of the forest stands onsite, the wind hazards associated with Virginia pines, and the lack of protected species occurrences onsite, no special protections of the onsite forested areas are warranted. The site is in conformance with the TCP1, approved by M-NCPPC in 2001. The TCP1 includes a commitment to preserve 10 percent of the woodland of the overall Town Center at Camp Springs site. This preservation requirement has been met on other parcels within the development. Additionally, the developer/owner would plant a minimum of 129 shade trees and 86 ornamental trees in accordance with the Landscape Manual. Tree canopy cover would be provided on 1.4 acres of the site, which exceeds the 1.07-acre (10 percent) requirement of the TCC Ordinance. Trees and other landscaping would consist of native plant species to the extent feasible, at a minimum of 50 percent for shade and ornamental trees and 30 percent for evergreens. A TCP2 was approved in January 2016.

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

3.9 Economy and Employment

3.9.1 What is the Economic Make-up of the Community Surrounding the Proposed Site?

A total of 15,300 businesses in Prince George's County employ 218,000 workers. Several Federal facilities are located within the County, such as Joint Base Andrews Naval Air Facility, the National Aeronautics and Space Administration's (NASA) Goddard Space Flight Center, the US Food and Drug Administration (FDA), the National Oceanic and Atmospheric Administration (NOAA), the Internal Revenue Service (IRS), the US Census Bureau, and the USDA Agricultural Research Center in Beltsville. Federal agencies employ approximately 8.6 percent of the county's civilian workforce. Other major employer types include higher education, telecommunications, medical services, and grocery stores (MD Department of Commerce 2016).

Table 3 below provides a summary of employment by occupation in Maryland, Prince George's County, and Census Tract 8019.05 where the proposed project is located. This summary is based on the most recent employment data available from the American Community Survey (ACS) 2014 5-Year Estimates.

Table 3. Employment by Occupation

Occupation	State of Maryland (%)	Prince George's County (%)	Census Tract 8019.05 (%)
Management, Business, Science, and Arts	44.5	37.4	41.1
Service	17	20.5	13.6
Sales and Office	22.9	24	31.5
Natural Resources, Construction, and Maintenance	7.9	9.7	5.9
Production, Transportation, and Material Moving	7.8	8.4	7.9

Source: US Census Bureau, 2010-2014 American Community Survey 5-Year Estimates

Table 4 below provides total unemployment rates for Maryland and Prince George's County, compared to the national average, based on data from the Bureau of Labor Statistics (BLS). As of September 2016, Prince George's County had an unemployment rate of 4.1 percent, which is lower than the national average of 4.8 percent and the Maryland rate of 4.2 percent. Unemployment in Prince George's County has been on the decline since 2014 (US BLS, 2016).

Table 4. Unemployment Rates 2014-2016

Year	United States	Maryland	Prince George's County
2016	4.8	4.2	4.1
2015	4.9	5	5.2
2014	5.7	5.5	5.9

Source: US Bureau of Labor Statistics

The median household income between 2009 and 2014 in Prince George's County was estimated at $73,856, which is lower than the state median of $74,149. The median household income of Census Tract 8019.05 is much higher at $91,766 (US Census Bureau 2014).

3.9.2 What Impact Would the Proposed Project Have on the Local and Regional Economy?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. There would be no impact to the local and regional economy at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Construction activities could result in minor,

direct, short-term, beneficial impacts to the local and regional economy. Once constructed, the development would be filled by another business and would result in minor, direct and indirect, long-term, beneficial impacts to the local and regional economy at the proposed project site.

One Town Center (Action Alternative)

The relocation of 3,200 Federal workers from the existing USCIS locations would result in a slight decrease in employees frequenting local businesses in those areas. However, all of the existing USCIS locations are in established commercial zones near the offices of other government agencies, private businesses, and organizations. Given the high number of other established office workers in these areas, the relocation of USCIS employees out of these areas is expected to have a negligible impact. The vacated office spaces would likely be back-filled by other government agencies, private businesses, or organizations. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a negligible, indirect, short-term, adverse impact on the local economy at the existing locations.

The relocation of 3,200 Federal employees to the proposed project site would likely increase patronage of existing area businesses. The presence of a large Federal employer at the project site would potentially stimulate economic activity and attract new retail services, restaurants, and businesses, which is consistent with the County's goals for redevelopment in the project area and the County as a whole. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct and indirect, long-term, beneficial impact to the local and regional economy at the proposed site.

During construction activities, the developer/owner would hire construction contractors and firms for the project, resulting in a temporary increase in regional economic activity. Onsite construction workers would likely patronize local businesses and restaurants. Therefore, construction of the proposed project is expected to have a minor, direct, short-term, beneficial impact to the local and regional economy at the proposed site.

3.9.3 How Would the Proposed Project Affect Employment in the Area?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No new employees would be hired, and no employees would be terminated. There would be no impact to employment at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Construction activities would create temporary jobs for construction workers and would result in minor, direct, short-term, beneficial impacts to employment. Once constructed, the development would be filled by another business and would result in minor, direct and indirect, long-term, beneficial impacts to employment at the proposed project site.

One Town Center (Action Alternative)

The proposed consolidation of the USCIS Headquarters would not directly impact employment at the existing locations. No USCIS employees would be hired or terminated. The vacation of the existing USCIS locations throughout Washington, D.C. and Northern Virginia would provide available office space for other

government agencies, private businesses, or organizations to expand or establish, possibly resulting in additional hires by these entities. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a minor, indirect, long-term, beneficial impact to employment at the existing locations.

The proposed consolidation of the USCIS Headquarters would relocate 3,200 USCIS employees to the proposed location in Camp Springs, Maryland. The proposed action would not directly impact employment at the proposed site, as USCIS would not hire additional employees. The proposed project would not require any USCIS employees to move residence to Prince George's County, and therefore would not directly affect the employment rate of County residents. However, overtime approximately three percent of USCIS employees could elect to move closer to the One Town Center site. This would result in a negligible, direct, long-term, beneficial impact.

The relocation of 3,200 employees to the site would result in increased patronage of area businesses. Secondary jobs would be created indirectly due to increased economic activity and the attraction of new retail services, restaurants, and businesses. Secondary jobs related to the increased economic activity stimulated by the proposed action may also lead to additional retail and business employment opportunities through a multiplier effect. Construction activities would create temporary jobs for construction workers. Overall, the proposed consolidation of the USCIS Headquarters would result in a minor, indirect, short and long-term, beneficial impact to employment.

3.9.4 How Would the Proposed Project Affect Taxes and Revenue?

The State of Maryland imposes an 8.25 percent tax rate on businesses' taxable income and a 6 percent sales and use tax on tangible goods. Prince George's County does not impose a corporate income tax or a sales and use tax (Maryland Department of Commerce 2016). Real estate taxes in the project area are assessed by several taxing authorities, including the State of Maryland, Prince George's County, M-NCPPC, and the Washington Suburban Transit Commission (WSTC) (PG County 2015). The tax rate varies by tax class; the proposed project site is in Tax Class 8, for a total rate of $1.486 per $100 of assessed value (MDAT 2016).

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. The lessors of these sites would continue to pay real estate and/or corporate taxes to the District and Arlington County. There would be a negligible, direct, short-term, adverse impact to taxes and revenue at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. During construction, there would be a temporary increase in spending by construction workers at local businesses which would result negligible, indirect, short-term, beneficial impacts to taxes and revenue. Once implemented, the No-Action Alternative would result in minor, indirect, long-term, beneficial impacts to taxes and revenue at the project site.

One Town Center (Action Alternative)

The relocation of 3,200 Federal workers from the existing USCIS locations would result in a slight decrease in employees frequenting local businesses in those areas, potentially causing a slight decrease in sales tax

revenues in these areas. However, all of the existing USCIS locations are in established commercial zones near the offices of other government agencies, private businesses, and organizations. Given the high number of other established office workers in these areas, the relocation of USCIS employees out of these areas is expected to have a negligible impact. The vacated office spaces would likely be back-filled quickly by other government agencies, private businesses, or organizations, whose employees would likely frequent local businesses. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a negligible, indirect, short-term, adverse impact on taxes and revenue at the existing locations.

The proposed action is the acquisition of space through leasing. GSA would lease space from a private developer/owner and the proposed site would remain under private ownership. Therefore, Prince George's County and the State of Maryland would see an increase in tax revenue from the proposed action because the developer/owner would be required to pay local and State property taxes. The relocation of 3,200 Federal employees to the proposed project site would likely increase spending at existing area businesses, resulting in increased sales tax revenue for Prince George's County and the State of Maryland. The presence of a large Federal employer at the project site is likely to attract new retail services, restaurants, and businesses, which would increase corporate, sales, and income tax revenues. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct and indirect, long-term, beneficial impact to taxes and revenue at the proposed site.

Construction activities would create temporary jobs for construction workers who would likely be residing and paying income taxes within the State, resulting in a slight temporary increase in income taxes from construction wages. There would be a temporary increase in spending by construction workers at local businesses, increasing sales tax revenues for the County and State. Therefore, construction of the proposed project is expected to have a negligible, indirect, short-term, beneficial impact to taxes and revenue at the project site.

3.9.5 What Measures Would Be Taken to Reduce the Impact on the Local and Regional Economy?

The impacts to the local and regional economy are expected to be beneficial. The increased economic activity that would be stimulated by the proposed action is consistent with the County's goals and plans for economic development. Therefore, no mitigation measures are necessary.

3.10 Community Facilities and Services

3.10.1 What Community Facilities and Services are Located Near the Proposed Project Site?

Fire and Emergency Medical Services (EMS)

The proposed project site is served by the Prince George's County Fire/EMS Department. Fire Companies that could respond to emergencies at the proposed project site include 829, 827, 825, 823, 826 and 832 (Personal Communication, Valencis, 2016). Prince George's County's Advanced Emergency Medical Services (AEMS) consists of 12 paramedic units that serve the entirety of Prince George's County (PG County AEMS 2016). In order to accommodate the planned development in the area, the Prince George's County Fire/EMS

Department is planning to add an additional ambulance and ten employees to Station 829 in fiscal year 2018 (Personal Communication, Woods, 2016).

Police

The proposed project site is served by Police District 4, Sector K, Police Beat K4. The nearest police station to the proposed project site is the District 4 Station in Oxon Hill, located at 5135 Indian Head Highway, approximately seven miles driving distance to the west of the project site (PG County Police Department 2016).

Healthcare

The closest civilian hospital is the MedStar Southern Maryland Hospital Center at 7503 Surratts Road, Clinton, Maryland, approximately seven miles driving distance from the site. Other hospitals in the area include the Prince George's Hospital Center in Hyattsville, Maryland, and the Fort Washington Medical Center in Fort Washington, MD (PGAtlas 2016).

Schools

The proposed project site is within the Princeton Elementary, Thurgood Marshall Middle, and Dr. Henry A. Wise, Jr. High School attendance areas. A total of three public schools were identified within one mile of the project area, including Skyline Elementary located approximately 0.6 miles due east, Princeton Elementary located approximately 0.8 miles to the southeast across the Capital Beltway, and the Andrew Jackson Academy for preK-8 located approximately one mile due north across Suitland Parkway. Private schools within one mile of the project site include St. Philip the Apostle School located approximately 0.4 miles to the southwest, and From the Heart Christian School and New Chapel Christian Academy, which are both located over one half-mile to the south on the other side of the Capital Beltway (PGAtlas 2016).

Libraries

No public libraries were identified within one mile of the proposed project site. The closest public library is the Spauldings Library, located at 5811 Old Silver Hill Road approximately 1.8 miles north of the proposed project site (PGAtlas 2016).

Parks/Recreation

The Michael J. Polley Neighborhood Park, located approximately one half-mile due west of the project area, includes two public tennis courts and a playground. The Henson Creek Stream Valley Park, managed by M-NCPPC, is located approximately 0.75 miles northwest and west of the project area. The M-NCPPC Suitland Bog Conservation Area is located approximately 0.75 miles north-northeast of the project site across Suitland Parkway. Several parks and athletic facilities are located over one half-mile south of the project area on the other side of the Capital Beltway. These parks include the Manchester Estates Neighborhood Park; the Auth Village Neighborhood Park, which includes a playground and soccer, tennis, basketball, and softball facilities; and the Andrews Manor neighborhood playground (PGAtlas 2016).

Places of Worship

A total of ten churches were identified within one mile of the proposed project site. The closest churches to the site include the St. Phillips Church, located at 5416 Henderson Way approximately 0.4 mile to the southwest, and the Church of Jesus Christ of Latter Day Saints, located at 5300 Auth Road approximately 0.5 miles to the southwest. Suitland Road Baptist Church is located 0.9 miles northeast of the project site. Five of the identified religious institutions are located over one-half mile to the south across the Capital Beltway, including the Nativity Episcopal Church, Church of the Great Commission, From the Heart Ministries, New Chapel Baptist Church, and the Kirkland Memorial Second Church. Two churches are located over one half-mile to the north across Suitland Parkway, including Expectation Bible Baptist Church and Ascension Baptist Church (PGAtlas 2016).

3.10.2 How would the proposed project impact community facilities and services?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and northern Virginia. There would be no changes to the demand for community facilities services at the existing facilities and therefore there would be no impact to community facilities and services under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Some temporary impacts related to construction noise may affect places of worship, businesses, and public facilities near the project site which would result in negligible, direct, short-term, adverse impacts. This development would increase the need for Fire and Emergency Medical Services. There would also be the potential for an increase in the number of calls for police response. Overall, the No-Action Alternative is expected to have a minor, indirect, long-term, adverse impact to community facilities and services at the proposed project site.

One Town Center (Action Alternative)

The proposed consolidation of the USCIS Headquarters would increase the need for Fire and Emergency Medical Services. Because the Prince George's County Fire/EMS Department would increase the number of employees and add an additional ambulance, the proposed project is not expected to affect the ability of Fire or EMS rescue workers to provide service to the rest of their service area.

Overall, because there would be an increase in the daytime population to the area surrounding the proposed USCIS Headquarters building, there would be the potential for an increase in the number of calls for police response. This could create a potential need for additional deployment of officers to District 4. However, it is not known at this time if this type of development would require additional officers to be hired thereby changing the capacity of the police force.

The proposed project would not remove or affect any existing school, park, recreational facility, or religious facility, nor would it result in a substantial change to community population that would adversely affect library or church capacity. Because a small percentage of USCIS employees would relocate to the area, the proposed consolidation of the USCIS Headquarters is not expected to affect the ability of the local

community facilities to provide service to the surrounding residents. There may be a slight increase in use of community parks and recreation facilities, but the existing facilities and services are expected to be able to accommodate the additional patronage and would not be adversely affected. Overall, the proposed consolidation of the USCIS Headquarters is expected to have a minor, indirect, long-term, adverse impact to community facilities and services at the proposed project site.

Some temporary impacts related to construction noise may affect places of worship, businesses, and public facilities near the project site. These impacts would be short-term and would only occur during normal business hours in accordance with the Prince George's County noise regulations. A noise pollution control plan would be prepared and implemented to protect adjacent public areas from excessive noise impacts during construction. Therefore, construction of the proposed project is expected to have a negligible, direct, short-term, adverse impact to community facilities and services at the proposed project site.

3.10.3 What measures would be implemented to reduce adverse impacts to community services and facilities?

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

3.11 Safety and Security

3.11.1 What Safety and Security Measures are Currently Provided?

Existing security measures for visitors to USCIS facilities include, but are not limited to: metal detectors, computer tomography for bags and other personal items, valid picture identification, and employee escorts. When visitors enter the building they are required to pass through a metal detector and their personal items are scanned to check for restricted items. All visitors must present a valid photo ID and a USCIS employee must escort the visitor within the building. Security guards are posted at various entrances to the buildings to ensure compliance with security measures.

The proposed project site is served by Police District 4, Sector K, Police Beat K4 (See Figure for map). The District Four Station is located approximately 7 miles away at 5135 Indian Head Highway, Oxon Hill, MD 20745. The proposed project site is served by the Prince George's County Fire/EMS Department. Fire Companies that could respond to emergencies at the proposed project site include 829, 827, 825, 823, 826 and 832 (Personal Communication, Valencis, 2016). The DC Metro Police force responds to incident that occur on DC Metro property.

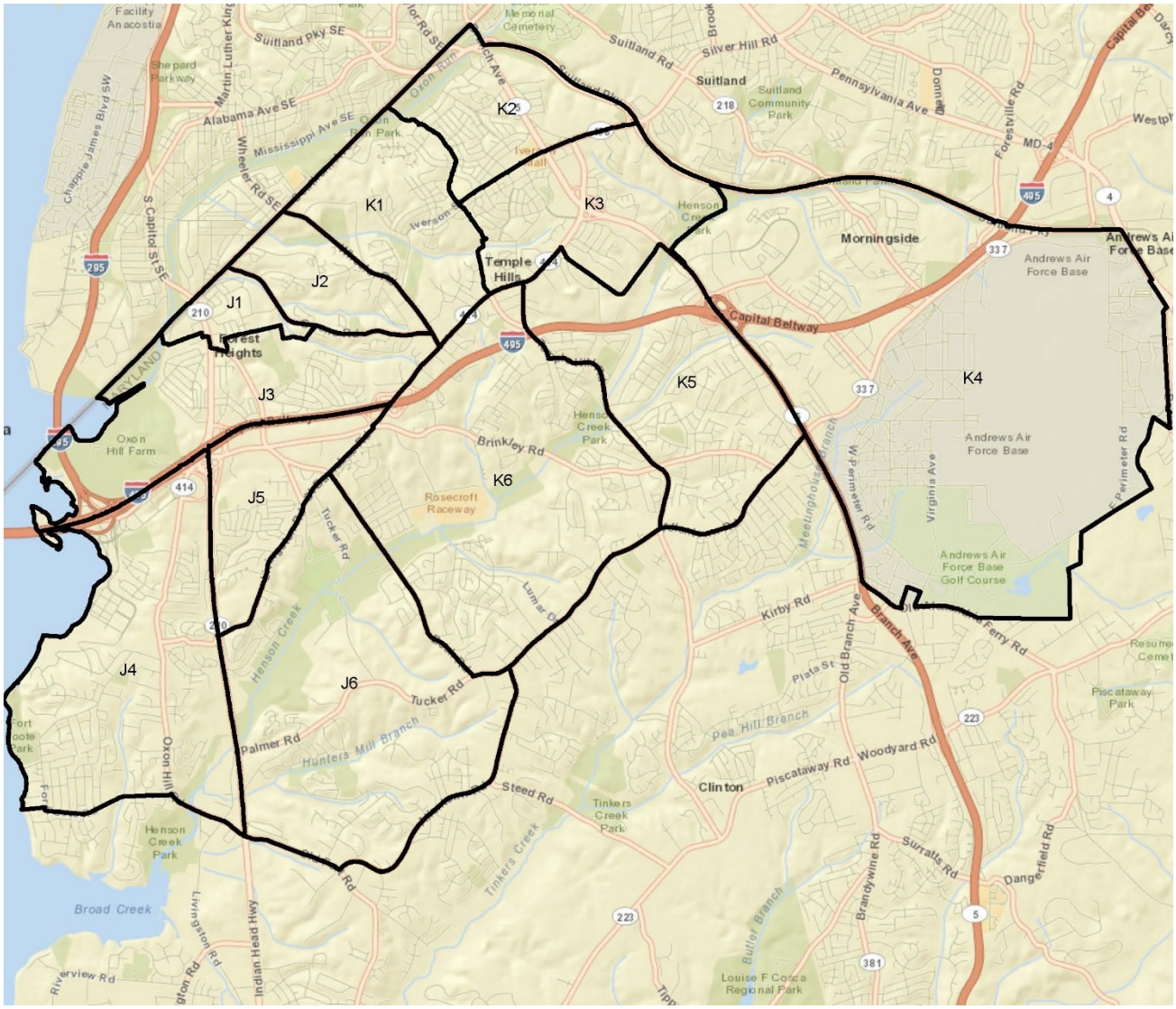

Figure 5: Prince George's County Police Department District 4 Beat Map

3.11.2 Are There Any Current Safety and Security Issues Surrounding the Proposed Project Site?

In 2014, crimes in Prince George's County accounted for approximately 17 percent of crime in Maryland (State of MD 2014). Of those crimes occurring in Prince George's County, approximately 18 percent occurred within District Four and approximately 1.3 percent occurred in Beat K4 (where the proposed project site is located). In 2014, District Four experienced a total of 5,670 crimes; of those, only 398 or 7 percent occurred within Beat K4. Selected crime statistics from Beat K4, District 4, Prince George's County, and Maryland are listed below in Table 5.

Table 5. District, County, and State Crime Statistics by Category (2014)

Crime	Number of incidents in Police Beat K4	Number of incidents in District 4	Total Number of incidents in Prince George's County	Total Number of incidents in Maryland
Homicide	0	12	56	363
Rape	8	33	206	1,144
Robbery	21	361	1,846	9,651
Assault	25	420	2,020	15,215
Burglary	58	960	4,767	28,175
Larceny/Theft	226	2,986	17,498	109,218
Motor Vehicle Theft	60	898	4,278	13,146
Total	**398**	**5,670**	**30,671**	**176,912**

Source: (PG County, 2014) (State of MD, 2014)

3.11.3 Will the Public be Allowed to Access the proposed USCIS Headquarters Building?

USCIS receives approximately 12,500 to 25,000 visitors per year. The public would have controlled access to the USCIS Headquarters building via vehicular and pedestrian security checkpoints. When entering the property by motor vehicle, visitors would approach a guarded gate entrance. The guard would allow visitors into the visitor parking area in the parking garage where visitors would then proceed to the building entrance. Most visitors are expected to access the site using public transportation in which case they would enter the building at a designated entrance. Once inside the building, visitors would be subjected to security screenings similar to those employed at current USCIS locations. Supply deliveries to the building would be directed to another guarded gate entrance and be granted access to the loading dock following a credentials check.

3.11.4 What Security Measures Would be Implemented at the New USCIS Headquarters Building?

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

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

The site design for the proposed USCIS Headquarters building would comply with the Interagency Security Committee Level IV standards for leased space. These standards ensure that the employees and information within the building are protected to an appropriate extent based on the number of employees, square footage of the building, information stored onsite, and the type of government agency. The implementation

of the described security measures would have a minor, long-term, direct, beneficial impact on the security of USCIS employees and visitors.

3.11.5 Will Police, Fire and EMS Stations that Serve the Property be Affected by the Proposed Consolidation of the USCIS Headquarters?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to Police, Fire and EMS Stations at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. This development would contribute a slight increase in the need for Fire and Emergency Medical Services. There would also be the potential for an increase in the number of calls for police response.

One Town Center (Action Alternative)

The proposed consolidation of the USCIS Headquarters could result in a slight increase in the need for Fire and Emergency Medical Services. Because the Prince George's County Fire/EMS Department would increase the number of employees and add an additional ambulance, the proposed project is not expected to affect the ability of Fire or EMS rescue workers to provide service to the rest of their service area. The proposed USCIS Headquarters building would be designed in accordance with national fire protection standards and would be subject to building code compliance inspections prior to and during occupancy of the building.

Overall, because there would be an increase in the commuter population to the area surrounding the proposed project site, there could be the potential for an increase in the number of calls for police response. This could create a potential need for additional deployment of officers to District 4. An increase in passengers taking the Metro to the Branch Avenue station could also create a potential increase in the demand for Metro Police response. However, it is not known at this time if this type of development would require additional officers to be hired thereby changing the capacity of the force.

3.11.6 What Impact would the Proposed Project have on Crime in the Area?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to crime at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. While the increase in daytime population may have the potential to impact crime, it is not quantifiable and not likely to be significant.

One Town Center (Action Alternative)

The safety and security measures to be implemented at the proposed USCIS Headquarters building would reduce the likelihood of a USCIS employee becoming a victim of a crime in the area of the proposed project site. All visitors would be subject to the security screening measures described above. The parking area and sidewalks surrounding the building would be well lit and equipped with 24-hour video surveillance to deter potential criminals during nighttime hours. To ensure employee safety after normal business hours, USCIS would employ additional security measures to help employees reach the Branch Avenue Metro Station or nearby bus stops.

3.12 Traffic and Transportation

3.12.1 What Makes Up the Local Roadway Network?

Regional access to the proposed project location is provided from the Capital Beltway (I-495/I-95) and MD 5 (Branch Avenue). Local access is provided by Auth Road, Auth Way, and Capital Gateway Drive.

- The Capital Beltway (Interstate 495/95) is an eight-lane divided freeway with a posted speed limit of 55 miles per hour, and annually carries approximately 343,000 average daily vehicles (AADT) according to 2015 MD SHA traffic data. A full-movement, grade-separated interchange is provided at MD 5 (Branch Avenue).

- MD 5 (Branch Avenue) is a six-lane north-south divided arterial highway. Turn lanes are provided at major intersections and traffic signals are provided at the MD 5 & Auth Way and MD 5 & Auth Road intersections. The posted speed limit is 45 miles per hour.

- Auth Way is a four-lane east-west undivided roadway with a posted speed limit of 30 miles per hour. It provides access to area businesses and the Branch Avenue Metrorail station. East of the Branch Avenue station, Auth Way becomes Capital Gateway Drive, which provides access to the One Town Center site.

- Auth Road is a two- to four-lane undivided roadway that provides access from the Capital Beltway, Allentown Road, Andrews Air Force Base, adjacent business, and the Branch Avenue Metrorail station. The speed limit on Auth Road is 30 miles per hour. A roundabout is provided at the Auth Road/Old Soper Road & Capital Gateway Drive intersection.

- Capital Gateway Drive is a four-lane divided roadway providing access to adjacent properties, Camp Springs Town Center, and the Branch Avenue Metrorail station. The posted speed limit is 30 miles per hour. Access to the proposed USCIS Headquarters building would be provided via two driveways connecting to the south side of Capital Gateway Drive.

3.12.2 How were Impacts to the Local Roadway Network Assessed?

The M-NCPPC requires that a capacity analysis for unsignalized intersections be performed based on the Highway Capacity Manual (HCM). Capacity analysis, a procedure used to estimate the traffic-carrying ability of roadway facilities over a range of defined operating conditions, was performed using Synchro 9, which is based on the methodology of the HCM to establish average volume to capacity (v/c) ratios, delays, and level

of service (LOS) for each intersection. Roadway geometry, signal timing, and traffic data were entered into the model.

In addition, the National Cooperative Highway Research Program publication, Roundabouts: An Informational Guide, Second Edition, has recommended that satisfactory operations for roundabouts occur between 85 and 90 percent of capacity. Where the analysis indicates a volume-to-capacity (v/c) ratio greater than 0.850 for the intersection, geometric improvements or trip reduction measures should be considered that would reduce the v/c ratio to an acceptable level. The SIDRA Intersection 6.0 software was used for the roundabout analysis.

3.12.3 How Would the Local Roadway Network be Affected by the Proposed Consolidation of the USCIS Headquarters?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to the local roadway network at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. The development would be expected to add additional roadway trips to the area roadway network although all intersections would continue to operate acceptably according to M-NCPPC standards. The No-Action Alternative would result in negligible, direct, long-term, adverse impacts to the local roadway network.

One Town Center (Action Alternative)

The proposed consolidation of the USCIS Headquarters, which would result in the co-location of approximately 3,200 USCIS employees, would add an additional 615 AM peak hour and 485 PM peak hour vehicle trips to the study area roadway network. This additional traffic would further degrade traffic operations at some intersections, although all the study intersections would continue to operate acceptably according to M-NCPPC standards, including the two new site driveways. It should be noted that improvements currently underway on MD 5 were designed to accommodate trips generated by the Town Center at Camp Springs development, including an office use on the proposed project site. Based on the results of the capacity analysis and the improvements currently underway on MD 5, negligible, direct, long-term, adverse impacts would occur.

3.12.4 What Public Transportation Facilities and Services are Available in the Vicinity of the Proposed Project Site?

The site has adequate access to transit via the Branch Avenue Metrorail station (Green Line), which is approximately 1,000 feet to the west. This station provides bicycle facilities as well as direct connections to Metrobus and Prince George's County THE BUS. However, it does not provide direct connections to VRE or MARC. VRE riders would have to transfer at the L'Enfant Plaza Metrorail station and MARC riders would need to transfer at the Gallery Place Metrorail station for the Red Line to Union Station.

3.12.5 How Would Pedestrians and Bicyclists Access the Proposed Project Site?

One Town Center lies within 1,000 feet walking distance to the Branch Avenue Metrorail station. Pedestrians would access the site via one crossing on Capital Gateway Drive at the intersection of Capital Gateway Drive & Metro Park-and-Ride. Although a new driveway would be constructed at this intersection, the intersection would remain unsignalized. The travel path on-site would meet ADA requirements of slopes of less than two (2) percent.

According to the PG Atlas website, M-NCPPC's GIS tool for Prince George's County, Auth Way and Capital Gateway Drive have planned sidepaths, bike routes, and shared use roads. The map also shows planned bike lanes along Branch Avenue and planned sidepaths on Auth Road. In addition, there are 10 bicycle parking spaces and 24 bicycle lockers located at the Branch Avenue Metrorail station. Additional bike racks would be provided in the proposed garage for USCIS employee use.

3.12.6 What Measures Would be Taken to Reduce Impacts to the Transportation Network?

Due to the number of employees expected to co-locate to the proposed USCIS headquarters, a TMP would be required. The TMP would outline TDM strategies that would encourage employees to utilize other commute modes besides driving alone, assigns a commuter coordinator, and discusses methods to evaluate the performance of the TDM plan. At the time that this EA was prepared, the TMP was currently in development in coordination with the National Capital Planning Commission (NCPC), GSA, and USCIS.

Potential strategies include, but are not limited to, the following:

- Designate a TDM coordinator to organize and promote the TDM plan and the use of alternative transportation modes.
- Hold annual commuter fairs with representatives of various transportation providers to explain transportation services available to employees.
- Provide real-time transit and alternative mode information using electronic message boards in the building lobby.
- Provide assistance with the formation of carpools and vanpools.
- Provide/promote a Guaranteed Ride Home service for carpool, vanpool, and transit users.
- Provide a shuttle service to connect the site to nearby mass-transit options.
- Establish minimum daily parking fees based on market rates for parking within the area of the site.
- Provide transit subsidies to employees.
- Develop compressed day off and telework programs.
- Provide priority parking for electric vehicles with charging stations.
- Provide priority parking for registered carpools and vanpools.
- Accommodate carsharing onsite at highly-visible priority locations.
- Provide bicycle parking and shower accommodations within the building.
- Provide ample pedestrian and bicycle connections to the surrounding retail, residences, and transit options.

3.13 Air Quality

3.13.1 Are There Any Air Quality Issues in the Washington Metropolitan Region?

Under the authority of the Clean Air Act (CAA) (USC. Title 42, Chapter 85, 1970, as amended in 1990), the US EPA has developed National Ambient Air Quality Standards (NAAQS) for certain air pollutants (criteria pollutants) deemed harmful to public health and the environment. These criteria pollutants include: nitrogen dioxide (NO_2), sulfur dioxide (SO_2), carbon monoxide (CO), ozone (O_3), particulate matter ($PM_{2.5}$/PM_{10}), and lead (Pb). The EPA designates areas where ambient concentrations are below the NAAQS as being in "attainment" and designates areas where a criteria pollutant level exceeds the NAAQS as being in "nonattainment."

Each state (or regional government) is required by EPA to develop a State Implementation Plan (SIP) that identifies the NAAQS attainment status for each pollutant and accounts for planned projects within the region that have potential to increase pollutant emissions.

Prince George's County is within the Washington Metropolitan Statistical Area (MSA) for air quality analysis. The Washington Metropolitan Region is designated as a non-attainment area for ground-level O_3 under the 8-hour standard (EPA, 2016). The 8-hour standard is defined as the 3-year average of the fourth highest daily maximum 8-hour average ozone concentration. The Metropolitan Washington Council of Governments (MWCOG) prepared a SIP to reduce O_3 in the region. The SIP to meet O_3 attainment standards was adopted in May 2007.

The CAA identified 188 air toxics also known as hazardous air pollutants. The EPA has assessed this expansive list of toxics and identified a group of 21 as mobile source air toxics (MSATs), which are set forth in an EPA final rule, Control of Emissions of Hazardous Air Pollutants from Mobile Sources (66 FR 17235). The EPA also extracted a subset of this list of 21 that it now labels as the six priority MSATs. These are benzene, formaldehyde, acetaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, and 1, 3-butadiene. These MSATs are considered the priority transportation toxics.

3.13.2 Will The Proposed Project Impact Air Quality in the Area?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No change to their existing leases and current management and maintenance routines would occur. There would be no new impacts to air quality at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Increased emissions from construction equipment could occur during construction activities. This could result in minor, direct, short-term and adverse impacts to air quality. An increase in traffic to the site could result in a minor to moderate, long-term, direct, adverse increase in emission levels surrounding the project site.

One Town Center (Action Alternative)

Federal actions including the lease construction of new office facilities such as the proposed consolidation of the USCIS Headquarters must be in conformity with the provisions of the CAA. General conformity requirements are applied to certain Federal actions within air quality nonattainment and maintenance areas.

Air quality may be temporarily impacted by construction activities at the proposed project site. Fugitive dust would be generated during construction resulting from site grading, wind erosion, and vehicular activities. Emissions from construction equipment, including earth moving equipment and paving equipment would generate particulate matter, Volatile Organic Compounds (VOCs), and Nitrogen Oxide (NO_x), which are the precursors to ozone. Construction activities for this site would extend for approximately one and a half years. The impact would be minor to moderate, direct, short-term, and adverse.

Based on the results of the employee commuter survey, approximately 22 percent more employees would drive to work alone if the USCIS Headquarters is consolidated to the One Town Center site. According to the traffic study, this would add an additional 615 AM peak hour and 485 PM peak hour vehicle trips to the study area roadway network. The increase in traffic is relatively low compared to the overall traffic volume in the area of the proposed project site. The traffic impacts of the site have been accounted for in the overall development plan for the Town Center at Camps Springs which was approved by Prince George's County in 2001. Improvements to Branch Avenue are currently underway to reduce the additional delay and idling times that would be caused by the proposed action. These measures would lessen the impact to air quality by reducing overall vehicle emissions. GSA, in coordination with USCIS, would develop a TMP which would outline TDM strategies that would encourage employees to utilize other commute methods besides driving alone. Because of the relatively low increase in overall vehicle emissions anticipated, there would be a minor, direct, long-term, adverse impact to air quality.

EPA has developed a "Hot Spot Analysis" for determining if a project would have adverse impacts on levels of $PM_{2.5}$. This analysis is not required for the proposed consolidation of the USCIS Headquarters because the project does not meet EPA's criteria (40 CFR 93.123(b)(1) as amended), and, in accordance with FHWA guidance, "40 CFR 93.123(b)(1)(i) should be interpreted as applying only to projects that would involve a significant increase in the number of diesel transit busses and diesel trucks on the facility." The proposed consolidation of the USCIS Headquarters would not result in an appreciable increase in diesel vehicles.

Under this alternative, a LEED®-Silver rated building is proposed, which is consistent with the voluntary measures package presented in the SIP. Therefore, heating and cooling equipment for the building would be modern, efficient units and it is not anticipated that the equipment would generate emissions above de minimis thresholds. Projects with emission levels below de minimis thresholds are considered to be in conformity with the CAA. If the proposed development would produce more emissions of VOCs or NO_x than 25 tons per year, the developer/owner would be required to undergo a New Source Review through MDE. In this case, the developer/owner would be required to offset emissions at a ratio of 1.15 to 1.00. By following

these requirements, the project would be in compliance with the MWCOG SIP and therefore in compliance with the CAA.

3.13.3 What Would be Done to Protect Air Quality During Construction?

Air quality impacts for the proposed project site could be considered significant during construction, even on a temporary basis, if MDE regulations and BMP control measures are not implemented. These short-term impacts would be minimized by adhering to accepted state and local construction site air quality control measures in the handling of materials and as part of grading activities. The developer/owner would also be required to implement a dust abatement/emissions control plan for construction activities. Measures to reduce emissions from construction equipment and control fugitive dust include water spraying of access roads and stockpiles, placing dust covers on vehicles that transport dust-emitting materials, and keeping disturbed areas to a minimum by developing the site in stages, all of which have been shown to be effective in controlling emissions.

3.13.4 What Permanent Measures Would be Taken to Reduce Long-Term Impacts to Air Quality?

The proposed USCIS Headquarters building would be required to achieve a LEED® Silver Rating and the tenant space to be provided must meet the requirements of LEED®-CI. Through the use of green building materials such as low-emitting materials in adhesives and sealants, paints and coatings, flooring systems, composite wood, and agrifiber products, indoor air quality would be maximized. Through the integration of design elements such as the use of modern heating and cooling equipment, onsite renewable energy sources, and the maximization of daylight, the demand for electricity would be reduced. This decreased demand would offset the power generation required from coal, oil, and/or gas fired sources, resulting in reduced emissions in the region.

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

3.14 Utilities

3.14.1 Who Provides Utility Service to the Proposed Site?

Water and sewer utilities are provided to the proposed project site by the Washington Suburban and Sanitary Commission (WSSC). Electrical service is provided by PEPCO, and natural gas service is provided by Washington Gas (PGAtlas, 2016).

The proposed project site is within the Broad Creek sewer basin. WSSC is currently constructing modifications to the Broad Creek Waste Water Pumping Station (WWPS), a new force main/gravity sewer/pressure sewer between the WWPS and the Piscataway Waste Water Treatment Plant (WWTP), and new storage and headworks at the Piscataway WWTP, collectively known as the Broad Creek WWPS Augmentation Project. This project would increase the overall capacity of the sewer system to the maximum possible extent and reduce and/or eliminate the occurrence of sanitary sewer overflows at the Broad Creek WWPS during rain events. The new sewer line and modifications to the Piscataway WWTP are expected to

be completed in May 2017. The modification of the Broad Creek WWPS would begin in January 2017 and is expected to be completed in 2020 (WSSC 2016a).

3.14.2 How Would Utilities Be Impacted by the Proposed Project?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No changes to existing utility services would occur. There would be no impact to utilities at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Small temporary disruptions to services at adjacent properties may occur due to construction activities which would result in negligible, indirect, short-term, and adverse impacts to utilities at the project site. An increase in utility demand from the new development would result in minor, direct and indirect, long-term, adverse impacts to utilities.

One Town Center (Action Alternative)

Since the proposed consolidation of the USCIS Headquarters involves new construction, the proposed project would result in an increased demand for water, sewer, gas, and electrical service at the proposed project site. Water consumption would be a result of sanitary uses, human consumption, and landscaping. Electricity consumption would be a result of lighting systems, and mechanical and electrical devices. Stormwater would discharge into public storm drains as it currently does, although ESD methods would likely reduce stormwater discharges to below current levels. Natural gas may be required for heating purposes. The utilities systems required to serve the proposed project site would not over burden existing systems.

The Broad Creek WWPS Augmentation Project team at WSSC was contacted via email on November 29, 2016, to determine the ability of the modified sewer system to accommodate the proposed consolidation of the USCIS Headquarters. WSSC confirmed that the Broad Creek WPSS Augmentation Project was designed to accommodate future development, including the Town Center at Camp Springs (WSSC, personal communication, 2016b). The proposed project would not affect the ability of WSSC to provide wastewater services to its customers. Due to the increased utility demand for the proposed project site and the goal of LEED® Silver certification, the proposed consolidation of the USCIS Headquarters is expected to have a minor, direct, long-term, adverse impact to utilities at the proposed project site.

Small temporary disruptions to services at adjacent properties may occur due to construction activities. Any disruptions would be advertised to affected areas and care would be taken to minimize these disruptions. Therefore, construction of the proposed project is expected to have a negligible, indirect, short-term, and adverse impacts to utilities at the project site.

3.14.3 What Conservation Measures Would Be Incorporated into the Development of the Proposed Site to Mitigate Impacts to Utilities and Increase Energy Efficiency?

In accordance with EO 13693: Planning for Federal Sustainability in the Next Decade and the EISA, the proposed consolidation of the USCIS Headquarters would be required to:

- Reduce energy consumption per square foot by 2.5 percent annually through 2025, relative to 2015 baseline;
- Improve and monitor the energy optimization, efficiency, and performance of new and existing data centers;
- Ensure that 25 percent of the total amount of building electric and thermal energy should come from clean energy sources by 2025;
- Reduce potable water consumption intensity by 2 percent annually through 2025, relative to 2007 baseline;
- Reduce industrial, landscaping, and agricultural water consumption by 2 percent annually through 2025, relative to 2010 baseline;
- Monitor and collect water balance data to improve water conservation and management;
- Install appropriate green infrastructure features on Federal property; and
- Reduce greenhouse gas emissions from agency-owned vehicles by 30 percent by the end of 2025, relative to 2014 baseline.

Energy conservation measures used to meet LEED® Silver requirements are similar to the requirements of sustainability outlined in EO 13693; therefore, Federal facilities that are LEED® Silver Certified are in compliance with the EO.

By achieving LEED® Silver certification, the proposed building would minimize the adverse impact to utilities. The proposed building would include water-efficient landscaping and fixtures that would reduce potable water usage by 30 percent. Other sustainable design measures would include high-efficiency lighting, modern and efficient heating and cooling equipment, and ENERGY STAR® appliances. A combination of ESD and structural methods would be implemented to retain and treat stormwater onsite, which would reduce stormwater discharges to public storm drains to below current levels. These water and energy conservation strategies would effectively reduce the overall adverse impact to water, sewer, electric, and gas usage and the increased burden on utility providers.

3.15 Waste Management

3.15.1 How Would Waste Be Managed at the Proposed Site?

In accordance with County Code Subtitle 21 and the Comprehensive Ten-Year Solid Waste Management Plan for FY 2012-2022 (Ten-Year Plan), municipal solid waste generated in Prince George's County is sent to the Brown Station Road Sanitary Landfill. Recyclable materials are taken to the County's Materials Recycling Facility in Capitol Heights, Maryland, where they are sorted and either crushed or baled. The County uses a single-stream recycling system. All construction and demolition waste generated in the County must be taken to one of two privately-owned landfills. The developer/owner would be responsible for collecting solid waste and arranging for recycling collection services, but are permitted to use County disposal facilities

provided that they are in compliance with the County's waste regulations (PG County Comprehensive Ten-Year Solid Waste Management Plan for FY 2012-2022, 2012).

Solid waste and recyclable materials generated at the proposed site would be handled in accordance with County Code and the Ten-Year Plan. Solid waste would consist of non-hazardous, paper or food based waste that is not recycled or composted. Solid waste would be placed into designated waste receptacles in office and common use areas. Recycled materials would be collected similarly, and would not need to be separated due to the County's single-stream recycling system. On a regular basis the waste receptacles would be emptied and the waste would be collected in dumpsters. The waste would be collected from the dumpsters on a weekly basis by a contracted solid waste and recycling collections service. The waste service would be responsible for removing waste from the site and disposing of it at a licensed County disposal facility or the County Materials Recycling Facility. The developer/owner would be required to divert at least 50 percent of recyclable or compostable material from the municipal solid waste to the maximum extent practical and in accordance with EO 13693, Prince George's County Code, and the Ten-Year Plan.

Furthermore, to meet the objectives of EISA and EO 13693, the developer/owner would reduce construction waste by diverting at least 50 percent of non-hazardous construction materials and debris and recycling or reusing materials whenever possible. All recycled material would be shipped from the proposed project site to end users by a contractor. The developer/owner would be responsible for the disposal of non-recyclable construction waste at one of the two County-approved private landfills.

3.15.2 How would the proposed project affect waste management?

No-Action Alternative

Under the No-Action Alternative, USCIS would remain in their current leased space in Washington, DC and Northern Virginia. No changes to the amount of solid waste or recyclables or current waste management strategies would occur. There would be no impact to waste management at the existing facilities under the No-Action Alternative.

Under the No-Action Alternative, it is assumed the One Town Center site would be developed by the developer/owner according to its approved detailed site plan. Construction waste would be generated during construction activities which would result in negligible, direct, short-term, adverse impacts to waste management at the project site. The proposed building would be leased by another agency, private business, or organization. The tenant would generate additional solid waste and recycling streams which would result in minor, direct, long-term, adverse impacts to waste management at the project site.

One Town Center (Action Alternative)

The proposed project would generate additional solid waste, recycling, and construction waste streams. The additional waste is not expected to overload any of the existing County disposal facilities. The amount of waste generated by the USCIS Headquarters Consolidation would be negligible in relation to the overall waste streams already generated in Prince George's County. The new facility would operate in a sustainable and waste-efficient manner in compliance with the EISA and EO 13693, which would reduce the impact to waste management. Therefore, the proposed consolidation of the USCIS Headquarters is expected to have a negligible, direct, long-term, adverse impact to waste management at the proposed project site.

Construction waste would be generated during construction activities. The developer/owner would be required to comply with the construction recycling and reuse requirements of the EISA or EO 13693, as well as Prince George's County Code and the Ten-Year Plan for disposal of construction waste. The developer/owner would be responsible for the disposal of non-recyclable construction waste at one of the two County-approved private landfills. These landfills are expected to be able to accommodate the additional waste streams. The amount of construction waste generated would be negligible in relation to the overall construction waste already generated in Prince George's County. Therefore, construction of the proposed project is expected to have a negligible, direct, short-term, adverse impacts to waste management at the project site.

3.15.3 What measures would be implemented to reduce waste generated at the proposed site?

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

3.16 What are Cumulative Effects and Why Are They Discussed?

CEQ regulations require federal agencies to assess the cumulative effects of federal projects during the decision making process. Cumulative effects are defined as:

> "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions" (40 CFR 1508.7).

In other words, would the proposed federal project add to or interact with the environmental impacts of past, present, or future projects, regardless of the agency or group implementing those actions? This section of the EA provides a description of the cumulative impacts that the proposed action, combined with other projects in the area, may have on the human environment. To help the reader gain a better understanding of cumulative effects, the text box provides further explanation.

Cumulative Effects: An Example

There is evidence that the majority of environmental effects may result not from the direct effects of a single action, but from the combination of individually minor effects of multiple actions over time. A hypothetical example of the type of cumulative effects that could result from GSA projects is as follows:

> A change in the character of a neighborhood resulting from federal office construction when added to local development.

In other words, a residential neighborhood may become increasingly more commercial as federal office and other local developments (office or mixed use retail) are constructed.

3.16.1 What Past, Present, and Future Projects Could Add to or Interact With the Impacts of the Proposed Project?

Past and Present Actions

The proposed project site is located in the suburbs of Washington, DC, in Prince George's County, Maryland. Following settlement of the region by English settlers, this site was farmed for over 300 years. Development of the land spread out from Washington, DC. with the earliest suburbs being located near the railroad and streetcars that provided access to the city. This development accelerated following World War II and during the 1950s and 1960s with the expansion of the Federal government. After World War II, the proposed project site was used as part of a quarry operation and the agricultural areas within the vicinity were developed as residential tracts. During this time the Capital Beltway (Interstate-495) was also built. Quarry operations continued until approximately the 1980's when the site was left vacant. By the early 2000's the Branch Avenue metro station was built adjacent to the site and new commercial and residential development occurred. The site has remained vacant until present day.

Today, the proposed project site is part of a larger development known as The Town Center at Camp Springs.

Future Actions

Information on approved future developments was obtained from Prince George's County and the M-NCPPC. Table 6 provides a list of planned developments in the vicinity of the alternative site.

Table 6. Planned Development in the Vicinity of One Town Center

Land Use	Size	Unit
Strayer University Building		
Educational Building	38,000	Square Feet
Metroplace at Town Center		
Residential	397	Units
Town Center at Camp Springs		
Residential	423	Units
Restaurant Row		
Retail	60,000	Square Feet
Carmel Midtown Square Apartments (part of Alta at Camp Springs Phase I)		
Residential	504	Units
Retail	50,398	Square Feet
Office	67,665	Square Feet
Liberty View		

Land Use	Size	Unit
Aspire Apollo (part of Camp Springs Phase II)	208	Rooms
Tribeca at Camp Springs		
Residential	282	Units
Retail	21,878	Square Feet

3.16.2 What Are the Cumulative Effects?

Past, present and future development has affected and would continue to affect the natural, cultural, and social environment at One Town Center site and surrounding areas. Current and future development continues to result in a loss of vegetation, putting pressure on natural habitats and adversely affecting wildlife. In addition, development increases impervious surfaces, which in turn would increase stormwater runoff. Additional development continues to put pressure on community services and increases demand for utilities, particularly electrical and water supplies. With an increase in development there also comes an increase in roadway congestion and the LOS on our roadways becomes problematic. Congestion and worsening LOSs contribute to poor air quality. The traffic analysis conducted for this EA accounts for future development and thus represents cumulative impacts for traffic (See Section 3.12). Finally, future development projects may present views of a more densely developed environment and could affect historic and archaeological resources.

Beneficial cumulative impacts associated with past, current, and future development include increased job opportunities, improved housing, and an increase in the regional and state tax base.

3.17 Are There Any Adverse Environmental Effects Which Cannot be Avoided Associated with the Proposed Project?

Environmental impacts for the proposed consolidation of the USCIS Headquarters have been described in detail in the previous sections of this chapter. In general, there would be unavoidable adverse effects due to the type of development project that is proposed. There would be a loss of land to building space which would include some vegetative areas. While some space would remain open, some areas would be paved, thereby not allowing vegetative growth. The paved areas also represent a loss of permeable land surface. This would reduce the rates of groundwater recharge and increase runoff from storm events. There would be permanent changes to the views surrounding the site due to the construction of a new building. There would also be an increase in traffic densities in the areas surrounding the proposed project location due to commuting employees.

3.18 What Relationships Exist Between the Local Short-Term Uses of the Proposed Project and Maintenance and Enhancement of Long-Term Productivity?

The long-term benefits of the proposed consolidation of the USCIS Headquarters would occur at the expense of short-term impacts within the vicinity of the proposed site location. These short-term effects would occur during the period of construction and would include localized noise and air pollution. However, these impacts are temporary and proper controls would be utilized to prevent these impacts from having lasting effects on the human environment.

Short-term gains to the local economy would occur as local companies and workers are hired and local businesses provide services and supplies during construction. However, upon completion of the project, the gains to the local economy would evolve into a long-term benefit as USCIS employees move into the facility and provide consistent business to the surrounding merchants. Short-term losses to the local economies may occur at the current USCIS locations when they are vacated for the consolidation. These office buildings are expected to be reused by other employers or developer/owners and therefore the loss would be recouped.

Furthermore, upon completion of the proposed consolidation of the USCIS Headquarters there would be a long-term increase in efficiency of USCIS operations. Coordination among various components and the agency would become more efficient because they would be in one centralized location. The proposed consolidation of the USCIS Headquarters would require the commitment of land for construction on the proposed project site. The total commitment would include a permanent loss of vegetation currently present onsite.

3.19 Are There Any Irreversible and Irretrievable Commitments of Resources Associated with the Proposed Project?

A commitment of fuel, including natural gas and energy would be required to construct the proposed building. Other resource commitments during the construction period would include construction materials and labor. Once the consolidation of the USCIS Headquarters is in place, there would be a commitment of utilities, fuel and power. All of these resources relating to the construction and maintenance of the proposed consolidation of the USCIS Headquarters and its infrastructure are considered irretrievably committed.

While there would be the above commitment of resources, through conservation and sustainability practices some of these resources, such as water supply, may be retrieved. In addition, the proposed consolidation of the USCIS Headquarters would require a lower expenditure of funds, energy, and fuel then presently committed under the existing leased facilities in Washington, DC and Northern Virginia. The proposed consolidation of the USCIS Headquarters would reduce some of these expenditures by co-locating USCIS employees into one building instead of spreading them across six separate buildings in Washington, DC and Northern Virginia.

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Appendix A – Scoping Letters and Comments

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Appendix B – Section 106 Consultation

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Appendix C –Agency Coordination

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Appendix D – Traffic Technical Report

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