

**U.S. General Services Administration  
Federal Bureau of Investigation  
Suburban Headquarters  
Internal Decision Document**

**I. Background and Introduction**

On September 22, 2022, the General Services Administration (GSA) released its Site Selection Plan (“SSP”) for the Federal Bureau of Investigation Suburban Headquarters. Shortly thereafter, as instructed by Congress in the Fiscal Year 2023 Consolidated Appropriations Act (the “FY23 Act”), representatives from GSA and the Federal Bureau of Investigation (FBI) met with the “individuals representing the sites from the State of Maryland and Commonwealth of Virginia” to discuss the SSP. Based on those discussions, and for the reasons discussed further below, GSA is releasing an amended version of the SSP.

**II. Change 1: Criteria #4, Sustainability and Equity**

GSA will incorporate Executive Order 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government* (Feb. 16, 2023), as part of Criteria #4, Promoting Sustainable Siting and Advancing Equity. The main reason for doing so is that the President issued this Executive Order 14091 after GSA finalized and released the original Site Selection Plan. Executive Order 14091 “builds upon [] previous equity-related Executive Orders by extending and strengthening equity-advancing requirements for agencies, and it positions agencies to deliver better outcomes for the American people.” Furthermore, E.O. 14091 instructs agencies to “undertake efforts...to strengthen urban equitable development policies and practices, such as advancing community wealth building projects [and] facilitating equitable flows of private capital, including to underserved communities...” Adding Executive Order 14091 brings the revised Site Selection Plan into closer alignment with the most recent directions and instructions provided by the President.

**III. Change 2: Criteria #5, Cost**

The revised Site Selection Plan adds a new cost element, the “Relative Cost Difference of Expected Construction Start Dates.” This new cost element recognizes that, if GSA were choosing between two sites, and one site could commence construction sooner than another site, the former site could potentially save costs (e.g., project escalation costs). This new cost element thus calculates the relative cost differences, if any, due to an earlier expected construction start date at any of the sites. A later construction start date would push the final completion of the overall project to a later date. The specific costs applied here will consist of two elements: (1) construction escalation; and (2) J. Edgar Hoover Building sustainment/carrying costs.

The “Cost of Off-Site Improvements” was previously included as part of the “Cost to Prepare Site.” The revised Site Selection Plan makes this a separate element for greater transparency, as these costs (if not offset by jurisdictional commitments) could significantly increase the cost associated with selecting a particular site.

Furthermore, instead of separating different costs into separate subcriteria, the revised Site Selection Plan consolidates them together in a single criteria. This ensures that all dollars are treated equally, thus avoiding a situation where, for example, a site with \$50m less in acquisition costs is weighed equally as \$10m of additional site preparation costs. The cost criterion thus now reads as: “Cost to Acquire Site + Cost to Prepare Site + Cost of Off-Site Improvements + Relative Cost Difference of Expected Construction Start Dates.”

#### **IV. Change 3: Criteria #3, Schedule Risk**

Subcriteria 3(b) previously was meant to capture to the earliest time the Government could commence construction activities. That concept is now largely accounted for in the new cost element, “Relative Cost Difference of Expected Construction Start Dates,” discussed above. That cost element rests on the expected construction start date for each site.

GSA believed, however, that there was value in capturing the concept of schedule risk, i.e., the concept that, although GSA may be able to project an expected construction start date for each site, there are risks that may delay that expected construction start date. Including that concept of schedule risk not only was consistent with GSA best practices but also would capture some of the concerns that GSA heard in the consultations. Specifically, some suggested that GSA should account for the costs associated with moving the classified tenant in Criteria 5, because GSA may ultimately bear those relocation costs. Because the classified tenant had expressed to GSA that it already intended to move regardless of the site selection process, including such costs is not consistent with GSA’s typical site selection practices. GSA did agree, however, that the possibility of challenges that the classified tenant might encounter in relocating is a schedule risk to the expected construction start date at that site. The concerns with the classified tenant are just one type of schedule risk, but GSA concluded that those concerns would be captured by creating a new subcriteria accounting for schedule risk.

The revised Site Selection Plan thus revises subcriteria 3(b) as “Schedule Risk.” This subcriteria will allow the panel to consider the potential schedule risks to meeting the expected construction start date at any of the sites. These risks include acquiring the site, relocating tenants, demolition of existing facilities, remediating the soil, and taking other necessary actions. The sooner the site is available for the commencement of construction activities, at the least risk to the Government, the better. The panel would analyze the risks associated with each site and then compare,

contrast, and weigh those risks against one another to evaluate the degree of future schedule risk to the Government.

#### **V. Change 4: Criteria #1, FBI Proximity to Mission-Related Locations**

The importance of proximity has remained a key element of the new FBI suburban campus project, as reflected in the longstanding plan to co-locate many separate FBI facilities and leases into the new facility to enhance collaboration. The 2011 GSA “Report of Building Project Survey, Federal Bureau of Investigation Headquarters Consolidation” highlighted the value of proximity, stating, “The preferred location will be within a reasonable distance of the White House, the U.S. Capitol, and Quantico with proximity to both a Metrorail station and the Beltway.” While the current Site Selection Plan includes proximity to Quantico, it does not include proximity to the White House and the U.S. Capitol. Accordingly, the Site Selection Plan is changed to include proximity to the White House and the U.S. Capitol as part of Criteria #1, specifically subcriteria 1(c).

#### **VI. Change 5: Updating Titles**

As reflected in the revised Site Selection Plan, changes have been made to the titles of several criteria and subcriteria.

First, GSA recognizes that the title of Criteria #1, “FBI Mission Requirement,” in the original Site Selection Plan caused unnecessary confusion, as GSA established in 2014 (as part of doing a comprehensive review of sites for the project in the DMV area) that all three sites meet the FBI’s baseline mission needs. Criteria #1 is changed to “FBI Proximity to Mission-Related Locations” to better reflect the intent of the criteria, which is meant to capture the new suburban campus’s geographic proximity to key FBI assets and partners.

Second, subcriteria 1(a) is changed from “Proximity of the Site to the FBI Academy Quantico” to “Proximity of the Site to FBI’s Quantico Facility” to better reflect the intent of Criteria #1. As the FBI further outlined during the consultation process, the campus in Quantico is more than just the FBI Academy; it is also home to, among others, the Laboratory Division and key assets of the Operational Technology Division and the Critical Incident Response Group.

Third, as discussed in above, the Site Selection Plan is updated to add proximity to the White House and the U.S. Capitol as part of subcriteria 1(c). Subcriteria 1(c) is accordingly changed from “The Proximity of the Site to the Headquarters of the U.S. Department of Justice” to “The Proximity of the Site to Downtown Facilities (U.S. Department of Justice, U.S. Capitol, and White House).”

Fourth, as explained above, GSA has added a more nuanced assessment of schedule risk into the subcriteria 3(b). Subcriteria 3(b) is accordingly changed from “Earliest Time the Government could Commence Construction Activities” to “Schedule Risk.”

Fifth, and relatedly, to capture that modified subcriteria, the title of Criteria 3 has been changed from “Site Development Flexibility” to “Site Development Flexibility and Schedule Risk.”

The criteria in the revised Site Selection Plan are as follows:

**Criteria #1: FBI Proximity to Mission-Related Locations (subcriteria are of equal importance)**

- 1.a: The Proximity of the Site to the FBI’s Quantico Facility
- 1.b: The Proximity of the Site to Non-Consolidating Operationally Significant FBI/NCR Real Estate Assets
- 1.c: The Proximity of the Site to Downtown Facilities (U.S. Department of Justice, U.S. Capitol, and White House)

**Criteria #2: Transportation Access (subcriteria are of equal importance)**

- 2.a: The Walking Distance from the Site to a Station on the Metrorail System Operated by the Washington Metropolitan Area Transit Authority
- 2.b: The Walking Distance from the Site to Virginia Railway Express (VRE) or the Maryland Area Regional Commuter (MARC)
- 2.c: Accessibility to Major Bus Line Stop(s)
- 2.d: The Site’s Proximity to the Nearest Commercial Airport

**Criteria #3: Site Development Flexibility and Schedule Risk (subcriteria are of equal importance)**

- 3.a: Site Area and Site Geometry
- 3.b: Schedule Risk

**Criteria #4: Promoting Sustainable Siting and Advancing Equity (subcriteria are of equal importance)**

- 4.a: Advancing racial equity and support for underserved communities through the Federal Government
- 4.b: Promoting sustainable locations for Federal facilities and strengthening the vitality and livability of the communities in which Federal facilities are located

**Criteria #5: Cost (cost elements are added together)**

- Cost to Acquire Site + Cost to Prepare Site + Cost of Off-Site Improvements + Relative Cost Differences of Expected Construction Start Dates

**VII. Change 6: The Weights Allocated to Each Criteria**

In reviewing the weights allocated in the original Site Selection Plan, GSA considered its commitment to meaningfully consider the feedback from each delegation, consistent with the FY23 Act. Further, GSA applied the following overarching framework in considering whether to change the original weighting allocations:

- 1) changes that will result in selecting a site that is best for the FBI and the American people over the long term;
- 2) changes that are grounded in our best practices in site selection, while incorporating new directives on sustainability and equity; and
- 3) changes that support a more fair and transparent process.

The revised Site Selection Plan reallocates the weights assigned to each criteria as follows:

Criteria	Proposed Percentage	Change from Current
FBI Proximity to Mission-Related Locations	25%	-10%
Transportation Access	20%	-5%
Site Development Flexibility and Schedule Risk	15%	unchanged
Promoting Sustainable Siting and Advancing Equity	20%	+5%
Cost	20%	+10%

These percentages maximize the value to the taxpayer and also match GSA’s determination that all three sites meet FBI’s baseline mission needs. Further, this weighting allocation reflects some of the concerns GSA heard in the consultations about the relative importance of each criteria, concerns that GSA regarded as legitimate. The revised weighting allocation maintains FBI’s interest in geographic proximity as the most highly weighted criteria, but the variation between the weighting is significantly reduced. Prior to the changes, for instance, proximity was 3.5 times greater than cost. Upon further reflection and based on input provided from interested stakeholders, GSA was unconvinced that any one criteria should be so significantly more important than any of the other criteria and believes that this weighting, with less variation, promotes a more fair process, in line with the agency’s principles.

Regarding the allocation to the equity and sustainability criteria, President Biden issued Executive Order 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government* (Feb. 16, 2023), after GSA finalized and released the original Site Selection Plan. In short, in increasing the percentage allocation to this criteria, GSA afforded considerable weight to the instructions issued to the entire Executive Branch, as explained further above.

Regarding the weight allocated to cost, GSA carefully considered feedback received during the consultation process, and ultimately agreed (as explained more fully above) that the agency should consider the relative cost differences that may exist at each site, based on when construction can be expected to commence. Furthermore, as briefly discussed above, the original criteria in the Site Selection Plan weighted proximity 3.5 times greater than cost. In reviewing the weights allocated to the other criteria and recognizing the addition of a new element, GSA reflected upon its duty to always look after the best interests of the American taxpayer from a financial perspective and recognized that the original Site Selection Plan weighted cost too low when compared to the importance of the other criteria. For example, the anticipated cost of off-site improvements, if not offset by jurisdictional commitments, ranged from \$300-\$400 million. That is a significant potential cost associated with individual sites that requires a more commensurate weighting for cost relative to the other criteria. As such, the weight allocated to cost in the revised Site Selection Plan is afforded equal weight with three other criteria, and only slightly below the number one weighted criteria.

GSA recognizes that changes to weighting from the initial submission are likely to lead to questions. It bears mention that weighting each criteria prior to the convening and evaluation of the site selection panel is not a typical practice of GSA. Moreover, in an ordinary site selection, the panel would assess weighting for criteria with the benefit of knowing how each criteria had been evaluated for the sites in question (e.g., thus allowing the panel to potentially accord little weight to criteria that provided only marginal differences between sites). Additionally, GSA also recognized that this site selection process is unique, in that the agency is being asked to select among three sites that were already down-selected in a previous Request for Expressions of Interest (REOI). That REOI ensured that any short-listed site met the minimum requirements of the FBI, in terms of proximity to the Beltway, the ability to accommodate the full program of the FBI, and the ability to meet, among other needs, Level V Interagency Security Committee Requirements. Given all that, it was challenging to decide on an appropriate weight for each criteria – in particular, ensuring that weighting reflected the general importance of a particular criteria to the FBI and public and not based on whether that criteria would, in the ultimate evaluation of the three sites in question here, be a meaningful differentiator. However, GSA believed, and still believes, that assigned weighting serves the public's interest by promoting transparency in a process and decision of such consequence to each community under

consideration. The weighting thus reflects, as explained above, GSA's best judgment regarding the general importance of the criteria to the FBI and the public.

### **VIII. Change 7: Scoring Methodology**

The Site Selection Plan is updated to reflect two changes to the scoring methodology.

First, GSA will use the same methodology for all of the evaluation criteria instead of having a separate scoring methodology for Criteria #4, Promoting Sustainable Siting and Advancing Equity. This brings alignment to all of the evaluation criteria and provides additional clarity to the process. It is also more consistent with the agency's typical site selection practices.

Second, the revised Site Selection Plan simplifies the scoring methodology. The sites are still relatively ranked with at least one site assigned Blue, but the methodology now explicitly recognizes that ties are allowed where differences are marginal. That change mitigates the potential for marginal differences to have outsized impact in the overall evaluation. The simplified methodology also eliminates the scoring method where if two sites are allocated a Blue rating (first place), then the third site must be allocated a Yellow (third place). Making this change affords the site selection panel with greater flexibility and is also more consistent with the agency's typical site selection practices.